

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**In Re: RENEWABLE ENERGY GROWTH :
PROGRAM FOR YEAR 2024, THE :
NARRAGANSETT ELECTRIC CO. d/b/a :
RHODE ISLAND ENERGY & RI :
DISTRIBUTED GENERATION BOARD : DOCKET 23-44-REG**

**DIVISION OF PUBLIC UTILITIES AND CARRIERS’
FIRST SET OF DATA REQUESTS DIRECTED TO OER AND SEA**

**(Issued January 4, 2024)
Response Submitted January 26, 2024**

DIV 1-1. Referencing SEA Table 11 and SEA Table 12 on page 70 of the testimony, please provide a more detailed description of the calculations or an unlocked Excel file that produces:

- a. The Capacity-Weighted BCR per MW Allocated Capacity (All MW) of 1.34 for the 2024-2026 period in Table 11 and
- b. The Annual Capacity-Weighted BCR per MW Allocated (All MW) of 1.13, 1.13 and 1.14 for 2024, 2025 and 2026 respectively in Table 12.

Please see the Excel workbook provided with this filing labeled “Detailed BCA Results_23-44-REG_DPUC First Data Request.” Please note, however, that the above values have changed due to minor corrections explained in responses to 1-2 through 1-4.

DIV 1-2. Referencing testimony page 73, lines 4 through 9:

- a. What are the specific values that are referenced in the question “Has this Commission previously approved adder values based in part on these specific values?”
- b. Under which category in Schedule 11 are the benefits that were applied in Docket 5202 (“an identical input to that assumed in its analysis in Docket 5202”) included? Were these benefits also included in any way in the baseline BCA for each class?
- c. Please provide a more detailed description of what these benefits consist of and how the values of such benefits were developed.

The specific value is SEA’s input for the ecological value of open space preservation, which is \$653/acre/year. In computing the total dollar value benefits for any given year, SEA assumes a capacity density of 3.8 acre/MW_{DC}. This input was applied to the category labeled “Ecosystem Services/ Value of Open Space.” These values were applied exclusively to the projects eligible for

a remediation incentive payment adder (although, as corrected in SEA’s response to question 1-3, these values were erroneously listed under the non-adder BCA for resource classes in Schedule 11).

The categories of benefit quantified as ecosystem service benefits consistent with R.I.G.L. § 39-26.6-22 include the non-carbon value of ecosystem services associated with water supply, water quality, flood and storm damage mitigation, wildlife habitat and air pollution removal provided by conserved open space. These adopted values were based on *The Economic Value of Protected Open Space in Southeastern Pennsylvania* Report prepared for the Delaware Valley Regional Planning Commission.¹ The inputs, and their applicability to open space in Rhode Island, are discussed starting on page 12 of *KD Schedule 1 – 2020 Program Year Carport Solar Pilot Program Evaluation Report*, as filed to accompany the Report and Recommendations for the 2021 REG Program Year in Docket 5088.²

DIV 1-3. Referencing SEA Schedule 11

- a. In tab “Megawatt Allocation Plan”, row 13, please confirm the values for Large Solar I. Based on the benefit values per MW for benefits such as Avoided Energy, Energy Dripe, Avoided Capacity, it seems that Large Solar I would have identical values per MW to Large Solar 1 CRDG, Large Solar II, Large Solar III and Large Solar IV. Referencing rows 31 through 35 and 48 through 52, it appears that all of the Large Solar classes should have equivalent benefits per MW for many of these categories. Can you please confirm this and provide corrected values for Row 13 if this incorrect?
- b. In tab “Incentive Rate Adders”:
 - i. In Column U, please explain why the value of the economic development adder for the partial capping scenario is greater than the value of the economic development adder for full capping.
 - ii. In Column R, why are there no benefits assumed for brownfields or landfills associated with “Ecosystem Services/ Value of Open Space”?

SEA can confirm that the values in row 13 of the “Megawatt Allocation Plan” tab should be identical to Large Solar I CRDG. Regarding the “Incentive Rate Adders” tab, SEA can confirm that the labeling of rows with regard to the treatment of costs for landfill capping was erroneously flipped. As such, it is correct that the economic development value for project receiving an adder including the cost of capping a landfill is greater than the economic development value for projects receiving an adder not including the cost of capping a landfill.

¹ Available here: <https://www.dvrpc.org/products/11033a/>

² Available here: https://ripuc.ri.gov/eventsactions/docket/5088%20RE%20Growth%202021%20-%20NGrid%20&%20DGBBoard/KD%20Schedule%201%20-%20REDACTED%202020_REG_Carport_Pilot_Evaluation_Report.pdf

Lastly, SEA can confirm that the “Ecosystem Services/ Value of Open Space” benefits were erroneously excluded for adder-eligible projects, and were erroneously included for projects not eligible for an adder. SEA has corrected the aforementioned transcription errors and is providing a corrected Schedule 11 with this information request response.

These corrections result in a 0.03 reduction in the final recommended MW allocation plans’ BCR over the three-year program period under consideration. Updated BCRs are provided in the Excel workbook provided with this filing labeled “Detailed BCA Results_23-44-REG_DPUC First Data Request.”

DIV 1-4. Referencing testimony page 73, SEA Table 14, please confirm that the BCAs presented represent the full BCA for projects receiving the adder and do not reflect the incremental costs of the adder compared to the incremental benefits of the adder. Please provide the details for the BCA results in Table 14 in a format similar to those presented in SEA Table 13 (i.e. SEA Schedule 11 provides information on the total NV of benefits per MW but does not provide information on the costs).

This is correct. The BCAs presented represent the full BCA for projects receiving the adder.

A breakout of the benefits and costs associated with adder-eligible projects is provided in the Excel workbook provided with this response labeled “Detailed BCA Results_23-44-REG_DPUC First Data Request.”