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February 23, 2024

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: 2024 Renewable Energy Growth Program Tariff and Rule Changes
Docket No. 23-44-REG – Reply Testimony**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) enclosed for filing with the Public Utilities Commission is the joint reply testimony of Dr. Carrie Gill, Ms. Erica Russell Salk and Mr. Kenneth Campbell in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 23-44-REG Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Leticia Pimentel

Leticia Pimentel

February 23, 2024

Date

Docket No. 23-44-REG – Renewable Energy Growth Program for Year 2024
The Narragansett Electric Company & RI Distributed Generation Board
Service List updated 1/17/2024

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JOINT REPLY TESTIMONY

OF

CARRIE GILL

ERICA RUSSELL SALK

AND

KENNETH CAMPBELL

February 23, 2024

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1 **Section I. Introduction**

2 **Carrie Gill**

3 **Q. Dr. Gill, please state your name and business address.**

4 A. My name is Carrie Gill. My business address is 280 Melrose Street, Providence, Rhode
5 Island, 02907.

6

7 **Erica Russell Salk**

8 **Q. Ms. Russell Salk, please state your name and business address.**

9 A. My name is Erica Russell Salk. My business address is 280 Melrose Street, Providence,
10 Rhode Island, 02907.

11

12 **Kenneth Campbell**

13 **Q. Mr. Campbell, please state your full name and business address.**

14 A. My name is Kenneth M. Campbell. My business address is 827 Hausman Road,
15 Allentown, PA 18104.

16

17 **Q. Have you previously submitted testimony in this proceeding?**

18 A. Yes. On November 15, 2023, we filed joint pre-file testimony on behalf of The
19 Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the
20 “Company”) in support of the Company’s proposed changes to: (1) RIPUC No. 2151-J,

1 Renewable Energy Growth Program for Residential Customers (“Residential Tariff”); (2)
2 RIPUC No. 2152-J, Renewable Energy Growth Program for Non-Residential Customers
3 (“Non-Residential Tariff”) (jointly, “Tariffs”); (3) Solicitation and Enrollment Process
4 Rules for Small-Scale Solar Projects (“Small-Scale Solar Rules”); and (4) Solicitation
5 and Enrollment Process Rules for Solar (Greater Than 25kW), Wind, Hydro and
6 Anaerobic Digester Projects (“Solar (Greater Than 25kW), Wind, Hydro and Anaerobic
7 Digester Rules”) (jointly, “Rules”). On January 29, 2024, the Company filed additional
8 proposed revisions to its Tariffs and Rules.

9
10 **Q. Did you have an opportunity to review the December 20, 2023, joint filing of the**
11 **Rhode Island Distributed Generation Board (“DG Board”) and the Office of Energy**
12 **Resource (“OER”) and the accompanying pre-filed testimony of Mr. Jim Kennerly**
13 **and Mr. Tobin Armstrong?**

14 A. Yes, we had an opportunity to carefully review the DG Board and OER’s December 20,
15 2023 joint filing and accompanying pre-filed testimony, and proposals made to the Rhode
16 Island Public Utilities Commission (“PUC” or “Commission”) relating to the Renewable
17 Energy Growth Program.

18

1 **Q. Do you wish to respond to or make any observations concerning the December 20,**
2 **2023 DG Board and OER filing?**

3 A. Yes. On behalf of the Company, and through this testimony, we wish to reply and react to
4 the following four items: (1) the appropriate funding for landfill capping; (2) the
5 proposed incentive-payment adders; (3) small-scale solar installation costs; and (4)
6 interconnection costs.

7

8 **Section II. Response to DG Board and OER December 20, 2023 Filing**

9 **A. Funding for Landfill Capping**

10 **Q. Please summarize your understanding of the DG Board and OER’s proposal**
11 **concerning the incentive-payment adder and landfill capping.**

12 A. The DG Board and OER “proposes the adoption of incentive-payment adders for
13 brownfield, Superfund, and landfill sites” (SEA testimony Bates page 51 lines 18-20),
14 where “a full adder was calculated that was designed to cover incremental costs
15 associated with both the capping of a landfill and the installation and maintenance of a
16 solar project on a capped landfill” and “a reduced adder was calculated that was designed
17 to cover incremental costs associated with only the installation and maintenance of a

1 solar project on a capped landfill, but not the costs associated with the capping of a
2 landfill” (SEA Testimony Bates page 52 lines 6-10).

3
4 **Q. Does the Company support the use of any Rhode Island customer funds to pay for**
5 **capping landfills?**

6 A. No, the Company does not support the use of Rhode Island customer funds to pay for
7 capping landfills. SEA characterizes the Company’s position in its testimony as follows:

8 “Rhode Island Energy suggested that, in cases in which an existing
9 party is responsible for the funding of landfill capping, the reduced
10 adder be applied such that such costs are not shifted to ratepayers
11 via the incentive-payment adder. If, however, a municipality can
12 attest that there is no party responsible for funding such capping
13 and that sufficient funds for such remediation activities do not
14 currently exist, it would be appropriate to apply the full adder to
15 fund the capping of the landfill and enable the development of the
16 site” (SEA testimony Bates 52, Lines 13-18).

17
18 Respectfully, the Company does not interpret § 39-26.6-22 as directing cost recovery for
19 capping landfills from electric customers, nor does the Company consider such cost
20 recovery mechanism appropriate or prudent. The Company does not expect any instances
21 in which a landfill does not have a party responsible for covering the costs of capping and
22 remediation (see SEA’s response to PUC 1-6). The Company interprets § 39-26.6-22 to
23 provide leeway for an incentive adder for projects on preferred sites that require
24 remediation only for the incremental project costs, such as those provided in SEA’s

1 response to PUC 1-5, and not the incremental costs of remediating the land or capping the
2 landfill.

3
4 **B. Proposed Incentive-Payment Adders**

5 **Q. Is Rhode Island Energy proposing the incentive-payment adders included in the DG**
6 **Board's filing?**

7 A. No, the Company is not proposing the incentive-payment adders included in the DG
8 Board's filing.

9
10 **Q. Please clarify the Company's role regarding the development, recommendation, and**
11 **administration of incentive-payment adders.**

12 A. The Company considers its role with respect to incentive-payment adders to be similar to
13 its role with respect to ceiling prices. Specifically, Rhode Island Energy's role is to
14 determine how to administer the Renewable Energy Growth program with the inclusion
15 of incentive-payment adders. This role is a practical one that concerns the process by
16 which the Company will include the incentive-payment adder in the open enrollment
17 process and in subsequent performance-based incentive payments to selected projects. On
18 behalf of customers, the Company has also weighed in on the development of the
19 incentive-payment adders with the objective of developing an appropriate incentive level
20 in compliance with state statute, as seen in SEA Schedule 8 pages 15-16 and 20-21.

21

1 **C. Small-Scale Solar Installation Costs**

2 **Q. Does the DG Board or OER propose collecting data from Rhode Island Energy**
3 **regarding the installed costs for Small-Scale Solar projects?**

4 A. Yes. Please refer to pages 32 and 33, lines 24 through 1 of the DG Board and OER direct
5 testimony “Recommendations for the 2024-2026 Renewable Energy Growth Program
6 Years.”

7
8 **Q. Does the Company currently track installation costs for Small-Scale Solar projects?**

9 A. No, the Company does not currently track installation costs for Small-Scale Solar
10 Projects. The costs are incurred on the customer’s side of the interconnection for
11 equipment they (or a third party) own. The source of the data regarding the installation
12 costs would be the solar installer and/or customer.

13
14 **Q. Is the Company able to obtain and provide this information in the future?**

15 A. The Company can work with the DG Board and OER to determine the most efficient way
16 for SEA to obtain this information. The Company suggests working with the DG Board
17 and OER to evaluate the Company’s role as an intermediary of this data given that the
18 Company is not involved in the installed costs, of which may be proprietary and/or
19 competitive in nature in the market to each solar installer. Additionally, the Company
20 would not be able to speak to the details of the data or address any questions that may

1 arise from SEA after evaluation of the data, thus, still requiring involvement from the
2 solar installer.

3
4 **D. Interconnection Costs**

5 **Q. Does the DG Board or OER state that cost sharing between developers and**
6 **ratepayers is not currently authorized in Rhode Island?**

7 A. Yes. Please refer to pages 21 and 22, lines 11 through 4 of the DG Board and OER direct
8 testimony “Recommendations for the 2024-2026 Renewable Energy Growth Program
9 Years”.

10
11 **Q. Does the Company agree with this statement?**

12 A. No. The Company would like to clarify the record regarding authorization of cost sharing
13 between developers and ratepayers.

14
15 Rhode Island General Laws § 39-26.3-4.1 provides that:

16 “(b) If the public utilities commission determines that a specific
17 system modification benefiting other customers has been
18 accelerated due to an interconnection request, it may order the
19 interconnecting customer to fund the modification subject to
20 repayment of the depreciated value of the modification as of the
21 time the modification would have been necessary as determined by
22 the public utilities commission. Any system modifications
23 benefiting other customers shall be included in rates as determined
24 by the public utilities commission.”
25

1 Therefore, cost sharing between developers and ratepayers may be authorized in Rhode
2 Island. The Company has filed two Petitions with the Commission in PUC Dockets 23-
3 37-EL and 23-38-EL, seeking approval for acceleration and subsequent reimbursement to
4 developers.

5
6 **Q. Does the DG Board or OER analysis of interconnection cost include data from states
7 other than Rhode Island?**

8 A. Yes. Please refer to pages 21 through 22, lines 3 through 31, as well as pages 39 through
9 41, lines 1 to 11, of the DG Board and OER direct testimony “Recommendations for the
10 2024-2026 Renewable Energy Growth Program Years”, in addition to SEA’s responses to
11 PUC 1-16, 1-17, and 1-18.

12
13 **Q. Does the Company agree that utilizing interconnection cost data from states other
14 than Rhode Island to assess future trends is reasonable?**

15 A. No. The Company suggests using Rhode Island specific interconnection cost data to
16 assess trends in interconnection costs for future years. Utilizing data from states other
17 than Rhode Island does not consider the differences in the electric distribution system
18 topology, engineering design standards, geographical differences in labor wages, how
19 pricing and procurement varies between Companies, and how regulatory constructs vary
20 between states.

21

1 **Section III. Conclusion**

2 **Q. Does this conclude your testimony?**

3 **A. Yes, it does.**