



March 28, 2024

Via Electronic Mail

Luly Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 23-44-REG Rhode Island Renewable Energy Growth Program for 2024

Dear Commissioners,

Climate Jobs Rhode Island is a coalition of more than 30 Rhode Island labor organizations, environmental groups, and community-based organizations committed to working together toward an equitable transition to a net zero economy.

We write to submit comments on Docket No. No. 23-44-REG in support of changes to the Renewable Energy Growth Program. Specifically, we write to support the OER/DG Board filing for the 2024-2026 Renewable Energy Growth program, which reflect changes made by the General Assembly during the 2023 legislative session.

We recognize and appreciate that the following factors need to be considered within the design of Rhode Island's energy programs:

- Energy and emissions requirements of the 2021 Act on Climate
- Ratepayer costs
- Safety and reliability
- Economic development

After reviewing the filings within this docket, we understand that some parties did not previously include an accurate reflection of the economic development benefits and costs within their BCA. Therefore, we urge the Commission to review and consider the updated benefit-cost analysis provided by SEA on March 15th, which examines a wholesale and more accurate representation of direct and indirect economic

development benefits and costs of the Distributed Generation Board's filing for the 2024-2026 Renewable Energy Growth program.

We strongly urge the commission and the parties to evaluate this docket within the context of the desires of the General Assembly through passage of the 2023 amendments to the Renewable Energy Growth program, which is now the intended policy of the state. The Distributed Generation Board's and OER's filing is consistent with the MW allocation plan.

Any investment in energy must factor in economic development. As a public service, it is also the policy of the state that energy investments and programs need to serve the public interest, which extends beyond basic consumer costs. Failing to factor direct and indirect economic development in decisions about our energy systems is counter to how the state makes decisions in other public service sectors, like healthcare, education, fire, and public safety.

Moreover, the DG Board's filing is consistent with the emissions requirements outlined in our emissions requirements in the 2021 Act on Climate which sets required mandates with consequences should we not reach set goals - another stated policy goal of the state on behalf of the public interest.

Thank you for the opportunity to provide comments. Please don't hesitate to reach us with any questions.

Sincerely,



Michael Roles
Executive Director
Climate Jobs Rhode Island