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March 18, 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 – Motion to Extend the 2023 Program Year Small-Scale
Solar Classes Performance-Based Incentive Through April 30, 2024**

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 Company’s Motion to Extend the 2023 Program Year Small-Scale Solar Classes Performance-Based Incentive through April 30, 2024.

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.



Elaina M. Weir

March 18, 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 3/4/2024**

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

_____))
_____))
In Re: Rhode Island Renewable Energy)
Growth Program for 2024)
_____)

Docket No. 23-44-REG

MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY TO EXTEND THE 2023 PROGRAM YEAR SMALL-SCALE SOLAR CLASSES PERFORMANCE-BASED INCENTIVE THROUGH APRIL 30, 2024

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby requests that the Public Utilities Commission (“PUC” or “Commission”) extend the existing standard performance-based incentive per kWh (“PBI”) approved in PUC Docket 22-39-REG for the Small-Scale Solar classes¹ of the Renewable Energy Growth Program from March 31, 2024 to April 30, 2024.² The reasons for the extension request are set forth herein.

I. BACKGROUND

The Rhode Island General Assembly enacted the Renewable Energy Growth Program (“Program”) in 2014 to facilitate and promote grid-connected generation of renewable energy in the state.³ For each program year, the Distribution Generation Board (“DG Board”) proposes and the Commission sets: (1) the classes of renewable energy projects that can participate in the Program; (2) the target amount of capacity that the Company may enroll in each class; and (3) the standard PBI or ceiling prices, as applicable, that the projects may seek from what is generally

¹ The Small-Scale Solar classes are Small-Scale Solar I (>0 to 15 kW DC) and Small-Scale Solar II (>15 to 25 kW DC).
² Please see Attachment A for the relevant PBIs.
³ R.I. Gen. Laws § 39-26.6-1.

known as a “feed-in tariff.”⁴ The “program year” is defined by Rhode Island law as “a year beginning April 1 and ending March 31.”⁵ With one exception, the Program classes for the Program are enrolled through a competitive bid process that occurs three times during the program year. The exception is the Small-Scale Solar classes, which are enrolled on a continuous open enrollment through a first come, first serve basis until the target amount of capacity that the Company may enroll in each class for the given program year is met.

II. 2024 PROGRAM YEAR

On November 15, 2023, and in compliance with § 39-26.6-10, the Company filed with the Commission its proposed changes to the Program Tariffs⁶ and Rules⁷ for the 2024 Program Year. On December 20, 2023, consistent with Rhode Island law which was recently amended to allow (but not require) three-year ceiling price proposals,⁸ the DG Board filed Recommendations for the 2024-2026 Renewable Energy Growth Program Years recommending classes, ceiling prices, and capacity targets (“DG Board Report”).⁹ In light of the DG Board Report, the Company made additional proposed revisions to the Tariffs and Rules to better align with the DG Board’s proposal, which the Company filed on January 29, 2024.

The hearing to consider the DG Board Report and the Company proposed changes to the Tariffs and Rules was rescheduled from February 6, 2024, at the request of the DG Board, to the next available date for the Commission of April 9, 2024. The Company was contacted by

⁴ PUC Order No. 24660, Docket 22-39-REG.

⁵ R.I. Gen. Laws § 39-26.6-3.

⁶ “Tariffs” herein refer to RIPUC No. 2151-J, Renewable Energy Growth Program for Residential Customers and RIPUC No. 2152-J, Renewable Energy Growth Program for Non-Residential Customers.

⁷ “Rules” herein refer to the Solicitation and Enrollment Process Rules for Small-Scale Solar Projects and Solicitation and Enrollment Process Rules for Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Projects

⁸ R.I. Gen. Laws § 39-26.6-3(2).

⁹ The annual MW target(s) and enrollment MW targets shall be recommended by the board no less frequently than every three (3) years, subject to commission approval. R.I. Gen Laws § 39-26.6-12.

Commission counsel ahead of this change and the Company did not object to the new date. However, since the 2023 Program Year and corresponding PBI levels run through March 31, 2024, and the 2024 Program Year and corresponding PBI levels will not be approved by the Commission until after the April 9, 2024 hearing, there will be a gap of approximately one month where the 2023 Program Year PBI levels have expired and the 2024 Program Year PBI levels have not yet been set. As such, the Company now seeks relief and approval of the Commission to extend the 2023 Program Year PBI levels for the Small-Scale Solar classes to allow for the continued enrollment throughout the program year.

The Company contacted several installers who have historically been active in enrolling Small-Scale Solar projects to inquire regarding a possible preference on how the Company should treat April 2024 applications. The Company received feedback from only one installer indicating a preference that any April 2024 application be deferred until May 2024 when the new 2024 Program Year PBIs for the Small-Scale Solar classes are set. However, the Company is concerned that in some instances a one-month deferral may be prejudicial to a project as some applicants may be under stringent construction deadlines or may have other reasons for needing to enroll in April 2024. Additionally, a one-month deferral may also send the wrong signal to the state's renewable energy market.

To avoid any disruption to the Program and to the continued enrollment of the Small-Scale Solar classes, the Company seeks Commission approval to:

1. Continue receiving applications for Small-Scale Solar classes in April 2024;
2. Communicate clearly with Small-Scale Solar class applicants who submit in April 2024 that the 2024 Program Year PBIs have not yet been set by the Commission but are expected to be set in May 2024 and that the 2023 Program Year PBIs have been extended to April

30, 2024 for interested projects;

3. Allow applicants two business days to reply/indicate if they prefer that the Company defer the April 2024 application until May 2024 when the new 2024 Program Year PBIs for Small-Scale Solar classes are set;
4. Proceed with processing the April 2024 applications subject to the 2023 Program Year PBIs shown in **Attachment A**, through April 30, 2024, if the Company does not receive a written response from the applicant in the two business days following the April 2024 application submission requesting deferral to May 2024.

The Company believes the proposed steps strike a balance between several interests, including giving applicants the option of how they wish to proceed with their specific Small-Scale Solar project while also not interrupting Program enrollment, creating a project backlog or sending a negative signal to the renewable energy market. The Company welcomes further direction and guidance from the Commission on how to proceed with administering the Renewable Energy Growth Program in light of the changes to the procedural schedule for the 2024 Program Year.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission extend the 2023 Program Year PBIs for the Small-Scale Solar classes from March 31, 2024 to April 30, 2024.

Respectfully submitted,

**The Narragansett Electric Company
d/b/a Rhode Island Energy**

By its attorneys,



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March 18, 2024

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2024, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 23-44-REG.



Elaina Weir

Ninth Tariff Supplement to RIPUC No. 2151-J
Sheet 1

The Narragansett Electric Company
Renewable Energy Growth Program for Residential Customers
Tariff Supplement

Program Year: April 1, 2023 through March 31, 2024

Performance-Based Incentives and associated Performance-Based Incentive Payment shall remain in effect during the term of service noted below in accordance with R.I. Gen. Laws § 39-26.6-20.

Term of Service represents the period of time during which the Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual Project, and the Term of Service for a particular Project will commence upon the first month of operation.

Renewable Energy Class	System Size	Ceiling Price/Standard Performance-Based Incentive (per kWh)	Term of Service
Small-Scale Solar I	>0 to 15 kW DC	27.75¢	15 years
Small-Scale Solar II	>15 to 25 kW DC	26.15¢	20 years

*Note: Shared Solar Facilities will apply for the same capacity as, and receive the same ceiling price as, Small Scale Standard DG Projects.

**Note: All ceiling prices are assumed to include all eligible federal incentives.