

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

IN RE: 2024-2026 RENEWABLE ENERGY GROWTH – :  
 CLASSES, CEILING PRICES, AND CAPACITY :  
 TARGETS AND 2024-2026 RENEWABLE ENERGY : DOCKET NO. 23-44-REG  
 GROWTH PROGRAM – TARIFFS AND SOLICITATION :  
 AND ENROLLMENT PROCESS RULES :

PUBLIC UTILITIES COMMISSION’S FOURTH SET OF DATA REQUESTS  
 DIRECTED TO OFFICE OF ENERGY RESOURCES (OER) AND/OR DISTRIBUTED  
 GENERATION BOARD (DG BOARD)  
 (Issued March 29, 2024)  
 (Due April 8, 2024)

4-1. Referencing response to PUC 2-13, what were the sources of the IRRs used in the CREST model?

**The assumed Target After-Tax Equity IRR for the proxy project for each renewable energy class is a weighted average of the assumed shares of sponsor and tax equity, multiplied by anticipated sponsor and tax equity return requirements. These values are based on a variety of estimates from both public and non-public sources. Many publicly available datapoints (such as the relative share of sponsor vs. tax equity in the capital stack) come from Norton Rose Fulbright’s Cost of Capital webinar at the beginning of each year. Information regarding the relative return requirements of sponsor and tax equity come from discussions with market participants, as well as publicly available information from Norton Rose Fulbright’s Project Finance Newswire.**

4-2. Referencing SEA Schedule 6 – Public-Facing CREST Model, 2024 Program Year Inputs tab, please reconcile the target after-tax equity IRR used for Large Solar I in cell =G664 with the 10.3% referenced in response to PUC 2-13.

**The 10.3% referenced in 2-13 should read 10.03%, rather than 10.3%.**

4-3. Please provide a table showing the proposed 2024 Program Year IRRs and last 5 years of input IRRs for each class. (Years in columns with classes in rows).

**The below table provides the levered Target After-Tax Equity IRRs by renewable energy class by Renewable Energy Class and Program Year (PY).**

Renewable Energy Class	2019 PY	2020 PY	2021 PY	2022 PY	2023 PY	Recommended 2024-2026 PY
Small Solar I	5.3%	5.0%	5.2%	7.0%	7.0%	7.0%
Small Solar II	9.7%	9.7%	13.0%	12.5%	12.5%	12.5%
Medium Solar	9.4%	9.5%	10.5%	10.4%	10.4%	10.5%

Commercial Solar I/CRDG	9.4%	9.5%	10.3%	10.1%	10.3%	10.3%
Commercial Solar II/CRDG	N/A	N/A	10.3%	10.1%	10.3%	10.3%
Large Solar I/CRDG	9.4%	9.5%	10.0%	9.9%	10.0%	10.0%
Large Solar II	N/A	N/A	N/A	N/A	N/A	10.0%
Large Solar III	N/A	N/A	N/A	N/A	N/A	10.0%
Large Solar IV	N/A	N/A	N/A	N/A	N/A	10.0%
Wind/CRDG	9.4%	9.8%	9.9%	11.0%	10.1%	10.1%
Small Scale Hydroelectric	9.4%	9.6%	12.5%	11.5%	10.1%	10.1%
Anaerobic Digestion	9.4%	9.6%	9.7%	10.8%	10.1%	10.1%

4-4. Is the amount of DG across AESC 2024 counterfactuals identical?

**Yes, all AESC 2024 counterfactuals utilize the same DG deployment assumptions.**

4-5. On slide 9 of the March 15, 2024 SEA presentation, bullet three states, “Unlike AESC 2021, AESC 2024 includes Counterfactual #5 (All-In DERs), which not only assumes further deployment of energy efficiency, demand response, and further electrification of transportation and buildings, but also assumes further deployment of distributed generation.”

a. What was the assumption for Distributed Generation levels in AESC 2021 for Rhode Island, including net metering and Renewable Energy Growth Program?

**For the REG program, AESC 2021 assumed approximately 485 MW of REG deployment incremental to 2021 through 2030. For the Virtual Net Metering program, AESC 2021 assumed approximately 250 MW of deployment incremental to 2021 through 2030. The AESC 2021 did not model incremental behind-the-meter Net Metering deployment to 2021.**

b. What was the assumption for Distributed Generation levels in AESC 2024 for Rhode Island, including net metering and Renewable Energy Growth Program?

**For the REG program, AESC 2024 assumes 1,485 MW of REG deployment incremental to 2023 through 2037. For the Net Metering program, AESC 2024 assumes 270 MW of deployment incremental to 2023 through 2033. For the Virtual Net Metering program, AESC 2024 assumes 376 MW of deployment incremental to 2023 through 2033.**

c. Does the AESC 2024 include the capacity expansions of the Renewable Energy Growth Program as allowed in R.I Gen. Laws § 39-26.6-12(c) or the capacity expansion proposed in this filing or neither?

**Yes, the AESC 2024 includes the capacity expansions of the REG program as allowed in R.I Gen. Laws § 39-26.6-12(c). In the 2024-2026 REG program years period specifically, AESC 2024 assumes a program capacity based on the**

**final proposed MW allocation plan filed with the PUC (less some assumed attrition).**

- 4-6. Please provide the Draft Allocation Plan(s) that was/were provided to stakeholders for comment on or about September 19, 2023, and any other plans as a pdf.

**Please see the files attached titled “2024-2026 REG Program Drafted Megawatt Allocation Plan – UPDATED.pdf” and “SEA REG CP and MW AP Development Update- DG Board Recommended 2024-2026 Program Plan.pdf”**

**Please note that the only stakeholder comments that were submitted on the drafted megawatt allocation plan during the period requested was Rhode Island Energy. Those comments are attached with this data request.**

- 4-7. Referencing PUC 2-10, please provide a copy of any presentations made to the DG Board at the September 20, 2023, or October 23, 2023, meetings. Please do not provide links.

**Please see the files attached titled “1st OE presentation 9-20.pdf”, “2nd OE ppt 10-23.pdf”, and “Tariff Revisions ppt 10-23.pdf”**

- 4-8. Regarding the BCA provided for Large Solar 1, please provide an electronic copy of the workbook SEA used to run the AESC 2024 model. (Commission Clerk will provide a link for submission at OER’s Attorney’s request).

**Please see the file named “23-44-REG\_Large Solar I\_PUC\_4-8\_BCA Calc.xlsx” filed with this response.**



**TO: Rhode Island Office of Energy Resources (OER) and the Distributed Generation Board (DG Board)**

**FROM: Rhode Island Energy**

**DATE: October 3, 2023**

**SUBJ: Response to Request for Comments on Renewable Energy Growth PY24-26 MW Allocation Plan**

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Rhode Island Energy respectfully submits the following comments and recommendations on the draft MW Allocation Plan for Renewable Energy Growth Program Years 2024-2026. Our objectives in submitting comments are twofold: (1) promote affordability through healthy competition for each class, resulting in more competitive bids and driving toward advancing the most cost-effective renewables for customers, and (2) class allocations should be grounded in historical participation trends.

**Regarding Commercial Solar II:** We note that the allocation might be a bit ambitious relative to past participation which may result in lack of competition. If the allocation were smaller but demand high, we note the possibility of reallocating from other classes to Commercial Social II for third-open enrollment if needed.

**Regarding Large Solar I:** We note that allocation may be too low in light of past participation. Given the affordability of the draft ceiling price, we recommend increasing the allocation for Large Solar I.

**Regarding CRDG:** We note that the number of projects awarded per class per year may be as low as one project. While this is good for creating a competitive bid process, it doesn't signal any room for anticipated growth in future years. We call this out just to give it attention, but don't offer any recommendations.

**Regarding Large Solar II-IV:** We suggest increasing the 2024 MW allocation to greater than zero to allow for some participation. There are 18 projects in the interconnection queue in either study or application stage that may be able to bid into the 2024 open enrollment.

**Regarding Small Hydro and Anaerobic Digestion:** We recommend separate MW allocations for each class rather than a combined MW allocation. In the event there is more project capacity bid than capacity available, RIE would most likely have to award the anaerobic digestion project(s) over the hydropower project(s), given the significant differences between the Small Hydro and Anaerobic Digestion ceiling prices.

**Regarding Anaerobic Digestion:** RIE recommends developing an adder for Anaerobic Digestors on landfills, as well as asks OER to consider if it is possible and advisable to increase the anaerobic digester eligible system size range.

Thank you for consideration of these comments!



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# Preview and Discussion of Potential PY24 Tariff and Rule Revisions

DG Board Meeting 10-23-2023

# Potential Conceptual Revisions



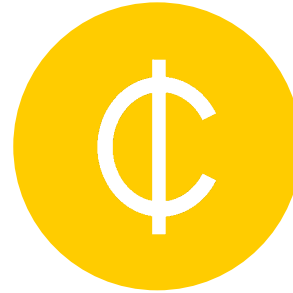
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General revisions and reorganization



Additions for detail, clarity, transparency



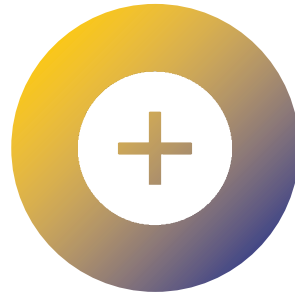
Update ceiling prices and MW allocations



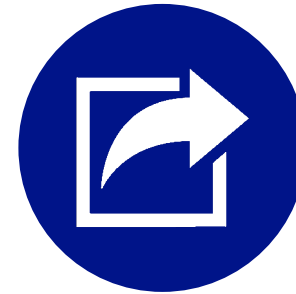
Align with statutory amendments



Medium solar extra extensions allowed with deposit



How to add panels to an existing solar system



Sharing inspection reports



Rules for terminations, extensions, inspections

- Substantive
- Updating
- Clarifying

# General Revisions and Reorganization

## Objectives:

- Revise to reflect PPL/Rhode Island Energy brand, look and feel
- Improve clarity and usefulness

## Types of revisions:

- Correcting typos and grammar
- Reorganizing, formatting, numbering for navigability
- Revising for readability



# Additions for Detail, Clarity, Transparency

## Objectives:

- Revise to reflect PPL/Rhode Island Energy brand, look and feel
- Improve clarity and usefulness

## Types of revisions:

- Shared solar?
- Project segmentation?
  - Consideration of campus developments?



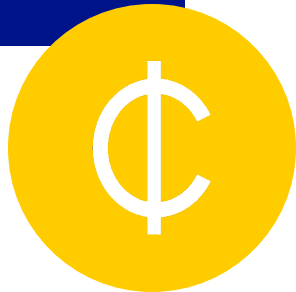
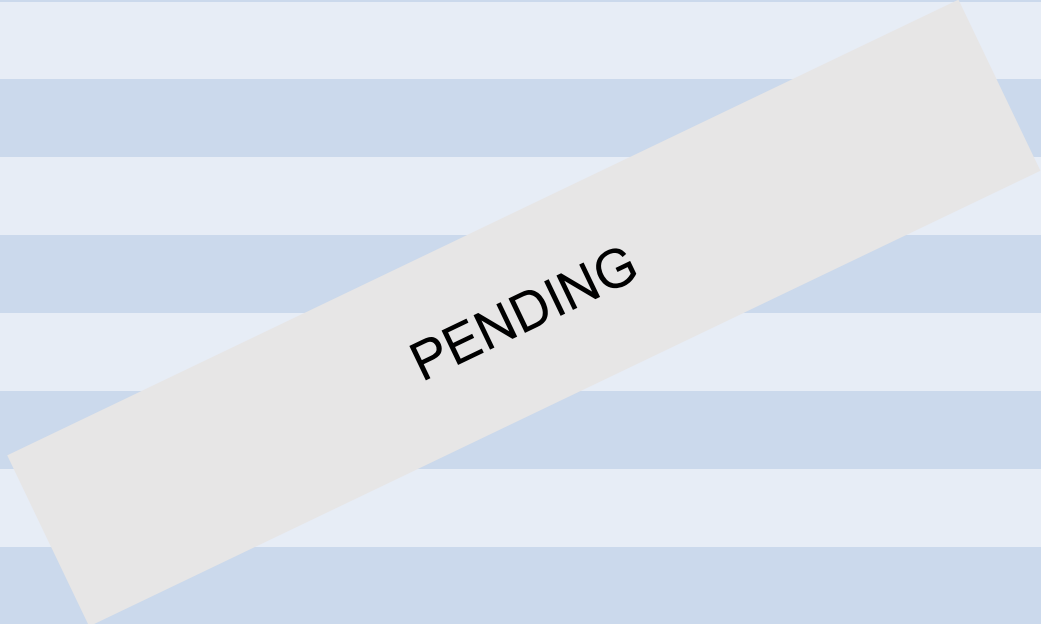


# Updated Class Allocations (MW DC)



> Pending allocation approved by XX-XX-2023 vote

Class	Class Size	2024	2025	2026
Medium Solar	>25 to 250 kW DC			
Commercial Solar I	>250-500 kW DC			
Commercial Solar II	>500-1,000 kW DC			
Commercial Solar – CRDG	>250-500 kW DC			
Commercial Solar – CRDG	>500-1,000 kW DC			
Large Solar I	>1,000-5,000 kW DC			
Large Solar – CRDG	1,000 - <5,000 kW DC			
Large Solar II	5,000 - <10,000 kW DC			
Large Solar III	10,000 - <15,000 kW DC			
Large Solar IV	15,0000 - <39,000 kW DC			



# Updated Class Allocations (MW DC)

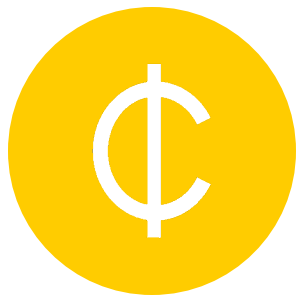


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> Pending allocation approved by XX-XX-2023 vote

Class	Class Size	2024	2025	2026
Small Solar I	0 to 15 kW DC			
Small Solar II	>15 to 25 kW DC			
Wind	>0-5,000 kW DC			
Wind – CRDG	>0-5,000 kW DC			
Anaerobic Digestion	>0-5,000 kW DC			
Hydroelectric	>0-5,000 kW DC			

**PENDING**



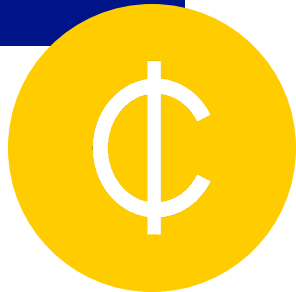
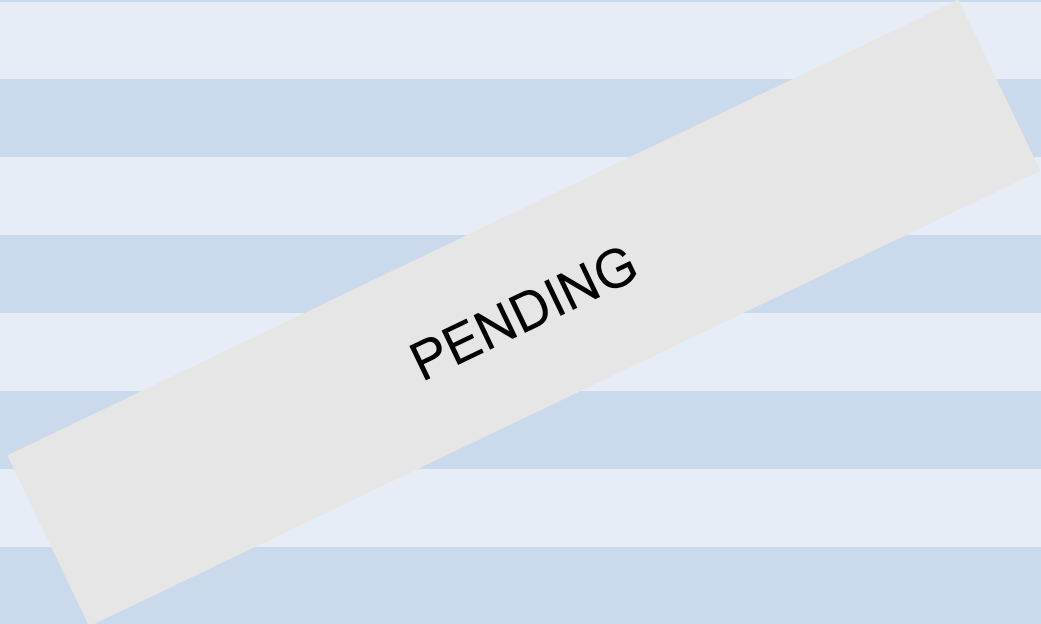
# Updated Ceiling Prices (cents/kWh)

> Pending ceiling prices approved by XX-XX-2023 vote



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Class	Class Size	2024	2025	2026
Medium Solar	>25 to 250 kW DC			
Commercial Solar I	>250-500 kW DC			
Commercial Solar II	>500-1,000 kW DC			
Commercial Solar – CRDG	>250-500 kW DC			
Commercial Solar – CRDG	>500-1,000 kW DC			
Large Solar I	>1,000-5,000 kW DC			
Large Solar – CRDG	1,000 - <5,000 kW DC			
Large Solar II	5,000 - <10,000 kW DC			
Large Solar III	10,000 - <15,000 kW DC			
Large Solar IV	15,0000 - <39,000 kW DC			



# Updated Ceiling Prices (cents/kWh)



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> Pending ceiling prices approved by XX-XX-2023 vote

Class	Class Size	2024	2025	2026
Small Solar I	0 to 15 kW DC			
Small Solar II	>15 to 25 kW DC			
Wind	>0-5,000 kW DC			
Wind – CRDG	>0-5,000 kW DC			
Anaerobic Digestion	>0-5,000 kW DC			
Hydroelectric	>0-5,000 kW DC			

**PENDING**



# Align with Statutory Amendments

## Objectives:

- Comply with amendments to Renewable Energy Growth statute as signed into law in 2023

## Types of revisions:

- Allow for ceiling prices to be adopted for up to three years
- Stipulate rules and processes for projects located in core forests and preferred sites
- Add large solar II-IV classes, associated deposits (including change in deposit cap)
- Adder for preferred sites that require remediation



# Medium Solar: Additional Extensions given Deposit

## Objectives:

- Respond to market need for additional time to implement projects

## Types of revisions:

- Allow for up to two 6-month extension periods for Medium Solar projects (for a total allowable implementation period of 36 months)
- If an extension is requested for a Medium Solar project, then there will be a required Performance Guarantee Deposit (no deposit required for 24-month implementation period)



# How to Add Panels to an Existing Solar System

## Objectives:

- Provide clarity to customers and developers
- Prepare for electrification

## Types of revisions:

- Describe process and rules for adding panels; determining PBI for added panels
- Note: will work with OER and DG Board on communications/outreach plan



# Sharing Inspection Reports

## Objectives:

- Improve quality through additional feedback loops

## Types of revisions:

- Allow for inspection reports to be given to customers and municipal inspectors





# Rules for Terminations, Extensions, and Inspections

## Objectives:

- Provide clarity to customers and developers

## Types of revisions:

- Detail data collection and process for termination?
- Detail data collection process for understanding conditions causing delays?
- Add clarity about the requirement for inspections, when they occur, consequences of refusal?



# Next Steps



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**11/15/2023**

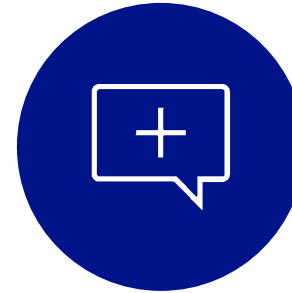
File revised tariffs and rules with the Public Utilities Commission



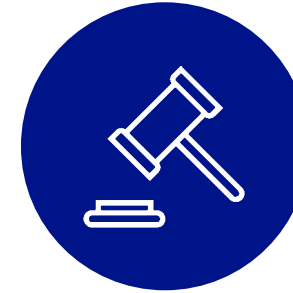
Parties may intervene in the PUC's docketed proceeding; discovery period



Public hearing at the Public Utilities Commission



Public comments accepted; see docket for more information



Commission ruling



**4/1/2024**

New tariffs and rules in effect for 2024 REG Program Year



# Contact



**Rhode Island Energy**<sup>TM</sup>  
a PPL company

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Head of Electric Regulatory Strategy

External Affairs

Rhode Island Energy

[cagill@rienergy.com](mailto:cagill@rienergy.com)

401-895-9282

Dear Rhode Island Renewable Energy Stakeholders,

On behalf of the Rhode Island Office of Energy Resources (OER) and Distributed Generation Board (DG Board), thank you for engaging in the stakeholder process surrounding the development of the Renewable Energy Growth program and prices Program Years 2024 and thereafter.

Pursuant to authorization provided to it by the recently-enacted [Chapter 300 and 301 – An Act Relative to Public Utilities and Carriers – Net Metering \[webserver.rilin.state.ri.us\]](#), on November 14, 2023, OER recommended, and the DG Board voted unanimously to adopt OER’s recommendation to provide the Rhode Island Public Utilities Commission (PUC) with the following elements of a three-year program plan. If approved by the PUC, the plan would elapse from April 1, 2024 to March 31, 2027.

The main elements of this recommended program plan are described in detail below.

**Recommended Renewable Energy Classes and Ceiling Prices**

For projects less than or equal to five megawatts (5 MW) of nameplate direct current (DC) capacity, the Board voted to recommend the Solar and Non-Solar Renewable Energy Classes and Ceiling Prices for the 2024, 2025 and 2026 Program Years (PYs) in the table below. The percentage change in these recommended prices for the 2024-2026 PY from the 2023 PY approved values is also shown.

Technology	Tariff Term	Size Range kW <sub>DC</sub> (Modeled Size kW <sub>DC</sub> )	2023 CP (Approved)	Proposed 2024 CP	Proposed 2025 CP	Proposed 2026 CP	% Change (2023→2024 PY)	% Change (2023→2025 PY)	% Change (2023→2026 PY)
Small Solar I	15	0-15 (5.8)	27.75	36.45	34.65	33.95	31%	25%	22%
Small Solar II	20	>15-25 (25)	26.15	33.15	31.95	31.35	27%	22%	20%
Medium Solar	20	>25-250 (250)	25.65	34.35	33.45	33.25	34%	30%	30%
Commercial I	20	>250-500 (500)	22.05	29.35	28.55	28.35	33%	29%	29%
Commercial I CRDG	20	>250-500 (500)	25.15	32.25	31.45	31.25	28%	25%	24%
Commercial II	20	>500-1,000 (1,000)	19.05	24.45	23.75	23.55	28%	25%	24%
Commercial II CRDG	20	>500-1,000 (1,000)	21.91	27.35	26.65	26.35	25%	22%	20%
Large Solar I	20	>1,000-4,999 (4,999)	14.35	18.65	18.05	17.85	30%	26%	24%
Large Solar I - CRDG	20	>1,000-4,999 (4,999)	16.50	21.35	20.75	20.52	30%	26%	24%
Wind	20	<=5,000 (3,000)	19.15	20.25	19.85	19.85	6%	4%	4%
Wind – CRDG	20	<=5,000 (3,000)	21.15	22.05	21.65	21.75	4%	2%	3%
Hydroelectric	20	<=5,000 (500)	31.95	34.15	33.35	33.45	7%	4%	5%
Anaerobic Digestion (AD)	20	<=5,000 (750)	19.05	19.25	18.95	19.05	1%	-2%	1%

In addition, and pursuant to authorization provided to the Board by Chapter 300 and 301, the Board recommended ceiling prices in three new Solar renewable energy classes for project larger than 5 MW<sub>DC</sub>. The recommended prices for these renewable energy classes (the size ranges for which are proscribed by Chapter 300 and 301) are shown in the table below.

Technology	Tariff Term (Years)	Size Range kW <sub>DC</sub> (Modeled Size kW <sub>DC</sub> )	Proposed 2024 CP	Proposed 2025 CP	Proposed 2026 CP
Large Solar II	20	5,000-<10,000 (9,999)	18.05	17.45	17.25
Large Solar III	20	10,000-<15,000 (14,999)	18.45	17.85	17.75
Large Solar IV	20	15,000-<39,000 (20,000)	18.15	17.55	17.45

Please note that there are no percentage change values because these are REG program size categories that have never been authorized by statute or recommended before. Please also note that projects in the Large Solar IV category must be sited on a “preferred site”, as defined in Chapter 300 and 301.

**Ceiling Price Adjustment Mechanism**

As noted above, Chapter 300 and 301 permit OER and the DG Board to propose Ceiling Prices and capacity allocations of up to three program years in duration. It is our understanding that this provision for a multi-year plan was ultimately adopted in order to provide market participants with a more significant degree of certainty regarding future prices and capacity allocations. During the stakeholder process, some stakeholders noted their concern that that unprecedented market volatility affecting renewable energy projects of all sizes and use cases could pose both upside and downside risks for a static set of Ceiling Prices (namely, that prices that do not account for some degree of changes in costs run the risk of potentially over- and under-compensating eligible projects). To balance these concerns regarding the impact of volatility on the costs that are critical to determining appropriate Ceiling Price values, OER recommended (and the Board unanimously adopted) a recommended Price Adjustment Mechanism based on the following interest rate and capital cost thresholds:

- If, for any renewable energy class during the term of the three-year program plan, the interest rates on term debt input values deviate more than 50 basis points (bps) above or below the value utilized in calculating the recommended Ceiling Prices, OER and the Board will recommend to the PUC an adjustment in the prices to account for this specific change in forecasted input value for the forthcoming year only. The basis for measuring the change in the interest rate on term debt input for any given class will be a comparison of the input value and the sum of the following:
  - The average value of 10-year and/or 20-year U.S. Treasury yields over the third quarter of the calendar year prior to the start of the subsequent Program Year, weighted and averaged to approximate the assumed debt term for the modeled project size; **PLUS**
  - A 325 bps risk premium.
  
- If, for any renewable energy class during the term of the three-year program plan, the total project development cost input value deviates more than 10 percent above or below the value utilized in calculating the recommended Ceiling Prices, OER and the Board will recommend to the PUC an adjustment in the prices to account for this specific change in forecasted input value for the forthcoming program year only. The basis for measuring the change in the upfront capital/installed cost input value will be a comparison of the input value and a broad averaging of the 50<sup>th</sup> and 75<sup>th</sup> percentiles of:

- Observed regional and Rhode Island-specific total project development cost values collected between January 1 of the calendar year prior to the calendar year prior to the program year in question and October 1 of the calendar year prior to the program year in question from state databases; and
- Revealed regional and Rhode Island-specific total project development cost values from a mix of accepted REG program bids and other values from available private databases (such as EnergySage).
- If, for any renewable energy class during the term of the three-year program plan, a change in state or federal law or regulations results in a direct, material and mandatory impact on the rate of return for eligible projects relative to what was calculated as part of the recommended Ceiling Prices, OER and the Board will recommend to the PUC an adjustment in the prices for the subsequent program year to account for such a direct, material and mandatory impact. While any change would apply to only the forthcoming program year, OER and the Board would reserve the right to propose such a change at any time prior to the start of said program year.

During the calendar year prior to the program year in question, SEA will conduct the analysis to establish whether the above thresholds have been met. SEA, on behalf of OER and the DG Board, will report the findings to stakeholders, without regard to whether any specific threshold was met.

#### **Incentive-Rate Adder Values**

In recognition of the siting restrictions imposed by the recently-enacted Chapters 300 and 301 with regard to core forested parcels of land, the recently-enacted law also requires either of the DG Board, OER or Rhode Island Energy to recommend to the Public Utilities Commission incentive-rate adders for Solar projects on parcels that “require remediation”. In accordance with these new statutory provisions, and in addition to the recommended Renewable Energy Classes and Ceiling Prices, the DG Board voted to recommend, as also recommended by OER and in line with guidance provided by the Rhode Island Department of Environmental Management (DEM), to adopt incentive-rate adders for projects sited on un-remediated brownfield and/or Superfund sites, as well as projects on un-capped landfill parcels only. For landfill projects, the recommended adder values would vary based on whether the municipality hosting the landfill can attest to its lack of existing funding to cap the landfill. Further detail regarding the process for qualifying for said adders will be included in Rhode Island Energy’s proposed revised Renewable Energy Growth program tariff and solicitation rules, which we will share with stakeholders upon its filing at the PUC. The recommended incentive-rate adder values are shown in the table below.

***Incentive-Rate Adders (Final Recommended 2024-2026 PY Values)***

<b><i>Renewable Energy Class</i></b>	<b><i>Uncapped Landfill Parcels on a DEM List</i></b>		<b><i>Un-Remediated Brownfield or Superfund Parcels on a DEM List</i></b>
	<b><i>Projects in Municipalities Unable to Attest to Lack of Remediation Funds</i></b>	<b><i>Projects in Municipalities Able to Attest to Lack of Remediation Funds</i></b>	
Non-Large Solar (<1 MW)	<b>4.30</b>	<b>8.00</b>	<b>3.60</b>
Large Solar I (1 MW-<5 MW)	<b>4.30</b>	<b>8.00</b>	<b>3.60</b>
Large Solar II (5-<10 MW)	<b>3.60</b>	<b>7.80</b>	<b>2.90</b>
Large Solar III (10-<15 MW)	<b>3.40</b>	<b>7.50</b>	<b>2.80</b>
Large Solar IV (15-<39 MW)	<b>3.30</b>	<b>7.40</b>	<b>2.70</b>

Please note that the recommended adder value by project size, if approved, would be available to all eligible projects during each of the 2024, 2025 and 2026 program years.

**Megawatt Allocation Plan**

As permitted by Chapter 300 and 301, the Board may recommend a plan of up to 300 MW of solicited capacity annually, with a minimum capacity set aside of 30 MW for projects less than or equal to 1 MW. Furthermore, the law also eliminated requirements that unused capacity be carried forward to subsequent program years. In line with these new provisions, the Board approved the following three-year Megawatt Allocation Plan.

<i>Renewable Energy Class</i>	<i>Size Bin (DC)</i>	<i>Recommended Program Year Allocation (MW<sub>DC</sub>)</i>		
		<i>2024</i>	<i>2025</i>	<i>2026</i>
Small Solar	<=25 kW	9	10	12
Medium Solar	>25-250 kW	5	7	9
Commercial Solar I	>250-500 kW	7.5	9.5	11.5
Commercial Solar I CRDG	>250-500 kW	0.5	0.5	0.5
Commercial Solar II	>500 kW-1 MW	10.5	11.5	12.5
Commercial Solar II CRDG	>500 kW-1 MW	1	1	1
Large Solar I	1-<5 MW	15	20	25
Large Solar I CRDG	1-<5 MW	5	5	5
Large Solar II	5-9.99 MW	35	35	35
Large Solar III	10-14.99 MW	15	30	30
Large Solar IV	15-38.99 MW	0	0	40
Wind	<=5 MW	3	3	3
Wind CRDG				
Small Scale Hydro	<=5 MW	1	1	1
AD				
<b>Total</b>	<b>All</b>	<b>107.5</b>	<b>133.5</b>	<b>185.5</b>

The plan is intended to represent a balancing of multiple objectives, including (but not limited to) 1) ensuring that the amounts solicited accurately reflect the amount of capacity expected to be eligible for REG qualification in each program (based on an analysis of Rhode Island Energy’s interconnection queue) and 2) ensure that the State’s policy objectives of encouraging siting of projects on preferred sites.

**Anticipated Next Steps/Important Note Regarding Program Plan Values**

OER and the Board anticipate filing the program plan with the PUC in December 2023. Though any schedule for the PUC’s review will not be known until the PUC issues such a schedule following the filing of the program plan, the 2024 Program Year will begin no later than April 1, 2024.

Though the PUC has historically declined to adjust the recommended Ceiling Prices, **market participants should bear in mind that the Megawatt Allocation Plan and Ceiling Prices are subject to revision by the PUC, upon its own recommendation, or the recommendation of any party involved in the proceeding. Therefore, any market participant’s assumption and/or reliance on these prices or available capacity allocations for investment or development decisions is undertaken at that market participants’ own risk.**

Thank you very much for your involvement in the process to date. SEA, on behalf of OER and the DG Board, will provide further relevant updates in the weeks and months to come.

Best,

**Jim Kennerly** | Director



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## UPDATED -- 2024-2026 REG Program – Drafted Megawatt Allocation Plan

REG Category	REG Size Bin	Total MW Per Renewable Energy Class (2024 PY)	Total MW Per Renewable Energy Class (2025 PY)	Total MW Per Renewable Energy Class (2026 PY)
Small Solar I	1-15 kW	7	9	11
Small Solar II	15-25 kW			
Medium Solar	>25-250 kW	5	7	9
Commercial Solar I	>250-500 kW	5	7	9
Commercial Solar I CRDG	>250-500 kW	0.5	0.5	0.5
Commercial Solar II	>500 kW-1 MW	10	15	20
Commercial Solar II CRDG	>500 kW-1 MW	1	1	1
Large Solar I	1-5 MW	15	20	25
Large Solar I CRDG	1-5 MW	5	5	5
Large Solar II	5-9.99 MW	0	15	25
Large Solar III	10-14.99 MW	0	25	35
Large Solar IV	15-38.99 MW	0	0	40
Wind	≤ 5 MW	3	3	3
Small Hydro	≤ 5 MW	1	1	1
Anaerobic Digestion	≤ 5 MW			
<b>Total MW Capacity</b>		52.5	108.5	184.5

The Office of Energy Resources is requesting any stakeholder or agency comments on the drafted allocation plan **through 5pm on Tuesday, October 3<sup>rd</sup>**.

Please submit your written PDF comments to the following individuals:

Shauna Beland - [shauna.beland@energy.ri.gov](mailto:shauna.beland@energy.ri.gov)

Abigail Hasenfus - [abigail.hasenfus@energy.ri.gov](mailto:abigail.hasenfus@energy.ri.gov)



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# REG PY 2023 Second Open Enrollment

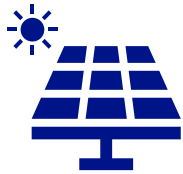
## Renewable Energy Growth Non-Residential Program

Presented to DG Board

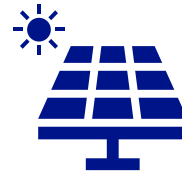
Created September 12, 2023

# PY 2023 Second Open Enrollment Summary

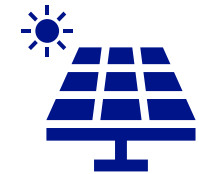
Renewable Energy Class	Class Nameplate Capacity (kW)	Second Open Enrollment Class Target (kW)	Ceiling Price (¢/kWh)	Term of Service (years)
Medium-Scale Solar	>25 – 250 kW DC	3,685 kW DC	25.65	20
Commercial-Scale Solar I	>250-500 kW DC	4,000 kW DC	22.05	20



**EPPD Canopy LLC**  
Solar PV Ground  
East Providence  
383 kW  
22.04 c/kWh



**Cape Verdean  
American Community**  
Solar PV Rooftop  
Pawtucket  
65 kW  
25.00 c/kWh



**NuGen Solar LLC**  
Solar PV Ground  
East Greenwich  
249 kW  
25.55 c/kWh

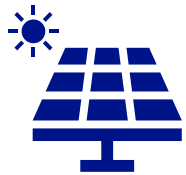
# Second Open Enrollment Year-on-Year Comparison

Renewable Energy Class	Class Target Capacity (kW)		Accepted Projects		Accepted Capacity (kW)		Remaining Capacity (kW)	
	2023	2022	2023	2022	2023	2022	2023	2022
Medium-Scale Solar	5,000	5,000	8	11	1,629	1,954	3,371	3,046
Commercial-Scale Solar I	4,000	4,000	1	1	383	1,976	3,617	2,024
Commercial-Scale Solar II	8,000	8,000	0	3	0	2,631	8,000	5,369
CRDG Commercial-Scale Solar I	3,000	3,000	0	0	0	0	3,000	3,000
CRDG Commercial-Scale Solar II	3,000	3,000	0	0	0	0	3,000	3,000
Large-Scale Solar	27,615	24,250	1	0	4,998	0	22,617	24,250
CRDG Large-Scale Solar	3,000	3,000	0	0	0	0	3,000	3,000
Wind	3,000	3,000	0	0	0	0	3,000	3,000
CRDG Wind								
Anaerobic Digestion	1,000	1,000	0	0	0	0	1,000	1,000
Hydroelectric								
<b>Total</b>	<b>57,615 kW</b>	<b>54,250 kW</b>	<b>10</b>	<b>15</b>	<b>7,010 kW</b>	<b>6,561 kW</b>	<b>50,605 kW</b>	<b>47,689 kW</b>

Notes: Solar project capacity is in kW DC. Accepted Projects, Accepted Capacity (kW), and Remaining Capacity (kW) are for the 1st and 2nd open enrollments of each respective year.

# Second Open Enrollment Year-on-Year Comparison

Class Target Capacity (kW)		Accepted Projects		Accepted Capacity (kW)		Remaining Capacity (kW)	
2023	2022	2023	2022	2023	2022	2023	2022
57,615 kW	54,250 kW	10	15	7,010 kW	6,561 kW	50,605 kW	47,689 kW



## Target Capacity

3,365 kW **more** target capacity in 2023 than 2022



## Accepted Projects

5 fewer projects awarded in 2023 compared to 2022



## Accepted Capacity

More awarded capacity, with higher capacity per project in 2023 relative to 2022



## Prior COEs Terminated

1 of the 10 accepted projects had terminated a prior COE and re-applied

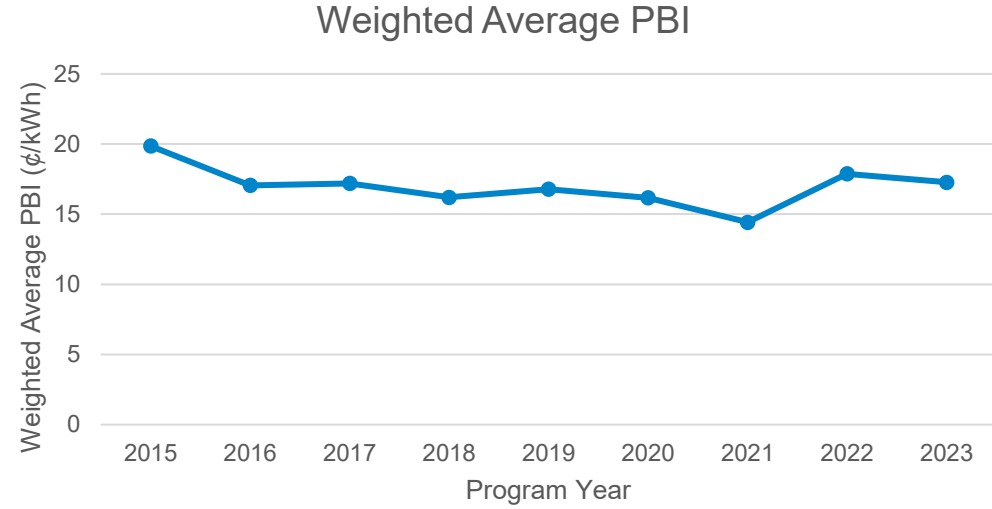
# Non-Residential Project Historical Comparison



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Program Year	Accepted Projects	Accepted Capacity (kW)	Weighted Average PBI (¢/kWh)
2015	20	19,474	19.86
2016	30	22,908	17.06
2017	34	33,243	17.20
2018	36	33,427	16.20
2019	61	43,059	16.79
2020	52	38,219	16.17
2021	44	38,994	14.42
2022	29	15,207	17.88
2023 (1st and 2nd Open Enrollment)	10	7,010	17.28
<b>Total</b>	<b>316</b>	<b>251,541 kW</b>	

# Non-Residential Project Historical Comparison (Cont.)





# Contact



Rhode Island Energy™  
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## **Carrie A. Gill, Ph.D.**

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a PPI company

REG PY 2023 First Open Enrollment

Renewable Energy Growth Non-Residential Program

Presented to DG Board

September 20, 2023

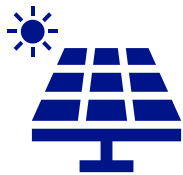
# PY 2023 Program Summary

Renewable Energy Class	Class Nameplate Capacity (kW)	Annual Enrollment Target* (kW)	Ceiling Price (¢/kWh)	Term of Service (years)
Medium-Scale Solar	>25 – 250 kW DC	5,000 kW DC	25.65	20
Commercial-Scale Solar I	>250 – 500 kW DC	4,000 kW DC	22.05	20
Commercial-Scale Solar II	>500 – 1,000 kW DC	8,000 kW DC	19.05	20
CRDG Commercial-Scale Solar I	>250 – 500 kW DC	3,000 kW DC	25.15	20
CRDG Commercial-Scale Solar II	>500 – 1,000 kW DC	3,000 kW DC	21.91	20
Large-Scale Solar	>1,000 - 5,000 kW DC	27,615 kW DC	14.35	20
CRDG Large-Scale Solar	>1,000 - 5,000 kW DC	3,000 kW DC	16.50	20
Wind	>0 - 5,000 kW	3,000 kW	19.15	20
CRDG Wind	>0 - 5,000 kW		21.15	20
Anaerobic Digestion	>0 - 5,000 kW	1,000 kW	19.05	20
Hydroelectric	>0 - 5,000 kW		31.95	20
<b>Total</b>		<b>57,615 kW</b>		

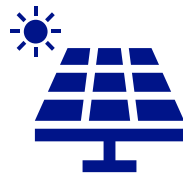
\*As approved in Docket 22-39-REG. Total Annual Enrollment Target does not include 9,000 kW DC small-scale solar class target, which is part of the Residential Renewable Energy Growth Program.

# PY 2023 First Open Enrollment Summary

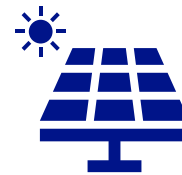
Renewable Energy Class	Class Nameplate Capacity (kW)	First Open Enrollment Class Target (kW)	Ceiling Price (¢/kWh)	Term of Service (years)
Medium-Scale Solar	>25 – 250 kW DC	5,000 kW DC	25.65	20
Large-Scale Solar	>1,000 - 5,000 kW DC	27,615 kW DC	14.35	20



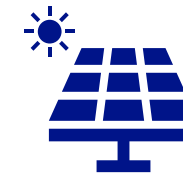
**51 Worthington Solar**  
Solar PV Rooftop  
Cranston  
174 kW  
24.50 c/kWh



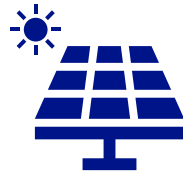
**West Main Solar II**  
Solar PV Rooftop  
Middletown  
221 kW  
25.55 c/kWh



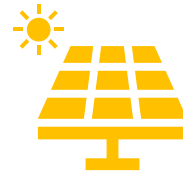
**High Point Avenue, LLC**  
Solar PV Rooftop  
Portsmouth  
225 kW  
25.24 c/kWh



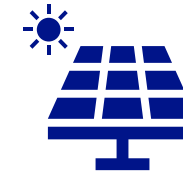
**Carver St Inc**  
Solar PV Rooftop  
Providence  
223 kW  
25 c/kWh



**Ecogy Energy RI IV LLC**  
Solar PV Ground  
Tiverton  
249 kW  
25.17 c/kWh



**White Brook Renewables, LLC**  
Solar PV Ground  
West Greenwich  
4,998 kW  
14.34 c/kWh



**Fifty Five Conduit St Realty**  
Solar PV Rooftop  
Lincoln  
223 kW  
25 c/kWh

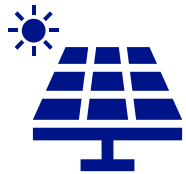
# First Open Enrollment Year-on-Year Comparison

Renewable Energy Class	Class Target Capacity (kW)		Accepted Projects		Accepted Capacity (kW)		Remaining Capacity (kW)	
	2023	2022	2023	2022	2023	2022	2023	2022
Medium-Scale Solar	5,000	5,000	6	9	1,315	1,454	3,685	3,546
Commercial-Scale Solar I	4,000	4,000	0	1	0	1,976	4,000	2,024
Commercial-Scale Solar II	8,000	8,000	0	1	0	633	8,000	7,367
CRDG Commercial-Scale Solar I	3,000	3,000	0	0	0	0	3,000	3,000
CRDG Commercial-Scale Solar II	3,000	3,000	0	0	0	0	3,000	3,000
Large-Scale Solar	27,615	24,250	1	0	4,998	0	22,617	24,250
CRDG Large-Scale Solar	3,000	3,000	0	0	0	0	3,000	3,000
Wind	3,000	3,000	0	0	0	0	3,000	3,000
CRDG Wind								
Anaerobic Digestion	1,000	1,000	0	0	0	0	1,000	1,000
Hydroelectric								
<b>Total</b>	<b>57,615 kW</b>	<b>54,250 kW</b>	<b>7</b>	<b>11</b>	<b>6,313 kW</b>	<b>4,063 kW</b>	<b>51,302 kW</b>	<b>50,187 kW</b>

Notes: Solar project capacity is in kW DC.

# First Open Enrollment Year-on-Year Comparison

Class Target Capacity (kW)		Accepted Projects		Accepted Capacity (kW)		Remaining Capacity (kW)	
2023	2022	2023	2022	2023	2022	2023	2022
57,615 kW	54,250 kW	7	11	6,313 kW	4,063 kW	51,302 kW	50,187 kW



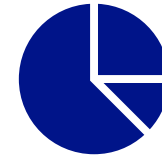
## Target Capacity

3,365 kW **more** target capacity in 2023 than 2022



## Accepted Projects

4 fewer projects awarded in 2023 compared to 2022



## Accepted Capacity

More awarded capacity, with higher capacity per project in 2023 relative to 2022



## Prior COEs Terminated

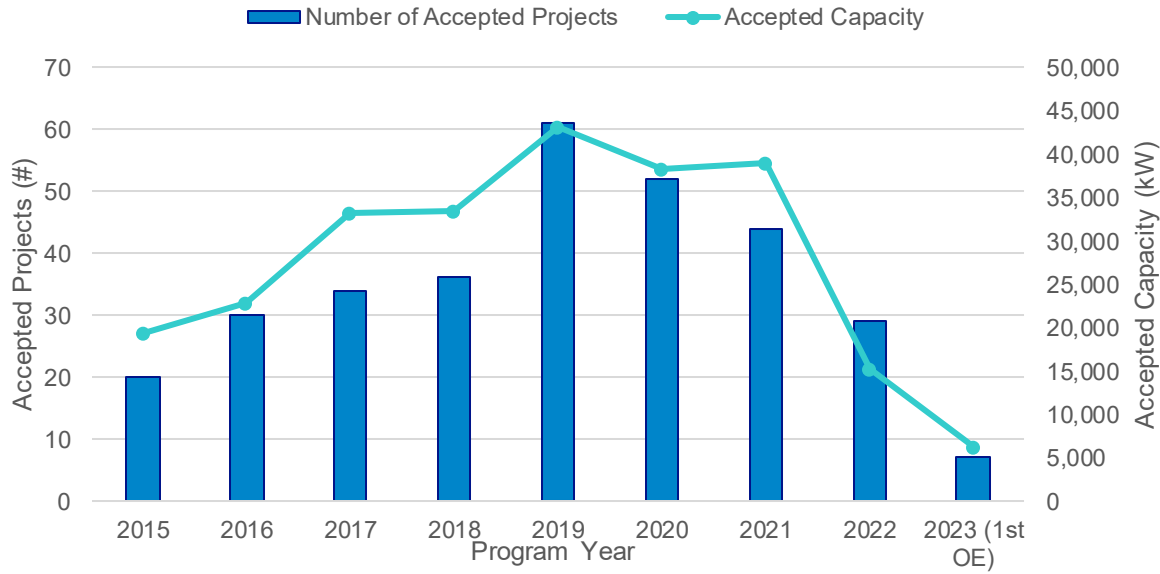
Zero of the 7 accepted projects had terminated a prior COE and re-applied

# Non-Residential Project Historical Comparison

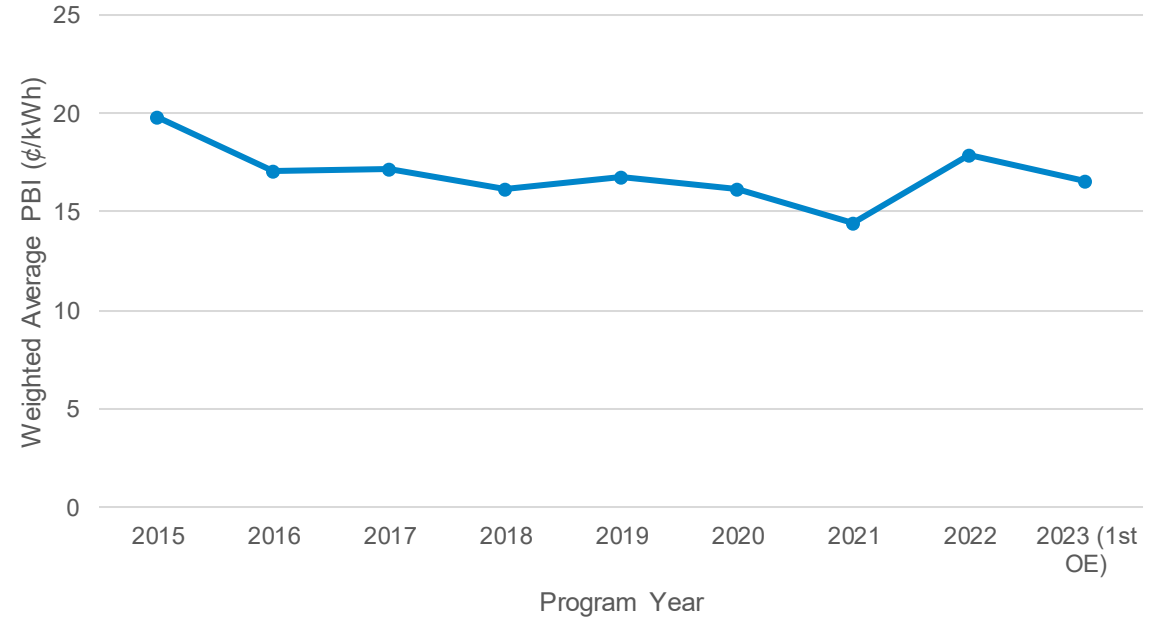
Program Year	Accepted Projects	Accepted Capacity (kW)	Weighted Average PBI (¢/kWh)
2015	20	19,474	19.86
2016	30	22,908	17.06
2017	34	33,243	17.20
2018	36	33,427	16.20
2019	61	43,059	16.79
2020	52	38,219	16.17
2021	44	38,994	14.42
2022	29	15,207	17.88
2023 (1 <sup>st</sup> Open Enrollment)	7	6,313	16.58
<b>Total</b>	<b>313</b>	<b>250,844 kW</b>	

# Non-Residential Project Historical Comparison (Cont.)

### Program Uptake



### Weighted Average PBI





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