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April 5, 2024

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 23-44-REG 2024 Renewable Energy Growth Program Tariff and Rule Changes**
**Responses to PUC Data Requests – Set 3**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company"), I have enclosed the Company's responses to the Public Utilities Commission's Third Set of Data Requests 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 Pimentel

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.

Heidi J. Seddon

April 5, 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**

| Parties' Name/Address | E-Mail | Phone |
|---|---|---|
| **The Narragansett Electric Company d/b/a Rhode Island Energy**<br><br>Andrew S. Marcaccio, Esq.<br>Celia B. O'Brien, Esq.<br>280 Melrose Street<br>Providence, RI 02907 | AMarcaccio@pplweb.com;<br>COBrien@pplweb.com;<br>JScanlon@pplweb.com;<br>CAGill@RIEnergy.com;<br>KRCastro@rienergy.com;<br>ERussell@rienergy.com;<br>RConstable@rienergy.com;<br>BLJohnson@pplweb.com;<br>KMCampbell@pplweb.com;<br>HDGonsalves@pplweb.com;<br>LKurdgelashvili@pplweb.com; | 401-784-4263 |
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| **National Grid**<br>Thomas Kender<br>Adam Crary | Thomas.Kender@nationalgrid.com;<br>Adam.Crary@nationalgrid.com; | |
| **DG Board / Office of Energy Resources**<br>Albert Vitali, Esq.<br>Division of Legal Services<br>One Capitol Hill, 4th Floor<br>Providence, RI 02908 | Albert.Vitali@doa.ri.gov;<br>Nancy.Russolino@doa.ri.gov;<br>Christopher.Kearns@energy.ri.gov;<br>Shauna.Beland@energy.ri.gov; | 401-222-8880 |

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| **Gridwealth Development**<br>Seth H. Handy, Esq.<br>Handy Law, LLC<br>42 Weybosset Street<br>Providence, RI 02903 | seth@handylawllc.com;<br>conor@handylawllc.com;<br>ispringsteel@gridwealth.com; | 401-626-4839 |
| A. Quincy Vale, Esq.<br>MassAmerican Energy LLC dba Gridwealth<br>33 Union Avenue<br>Sudbury, MA 01776 | qvale@gridwealth.com; | 617-694-5181 |
| File an original & 9 copies w/:<br>Luly E. Massaro, Commission Clerk<br>Cynthia Wilson-Frias, Commission Counsel<br>**Public Utilities Commission**<br>89 Jefferson Blvd.<br>Warwick, RI 02888 | Luly.massaro@puc.ri.gov;<br>Alan.nault@puc.ri.gov;<br>Todd.bianco@puc.ri.gov ;<br>Cynthia.WilsonFrias@puc.ri.gov;<br>Christopher.Caramello@puc.ri.gov; | 401-780-2107 |
| **Interested Parties:** | | |
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| | | |
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PUC 3-1

Request:

Referencing Docket No. 23-35-EE (2024 Energy Efficiency Plan Narrative), Bates page 212, Table 9, please list the cost of energy efficiency and the cost of energy supply.

Response:

Please see below Table 9 from Docket No. 23-35-EE (2024 Energy Efficiency Plan Narrative), Bates page 212, which lists the components included in the cost of energy efficiency and cost of energy supply analysis, and Table 10, Bates page 214, which lists the dollar values of these components.

*Table 9. List of the Costs of Energy Efficiency and Costs of Energy Supply*

| Costs of Energy Efficiency | | |
|---|---|---|
| **Cost** | **Included (Y/N)** | **Explanation** |
| Utility Costs | Yes | These costs are incurred to achieve implementation of energy efficiency measures and programs. Includes all costs in Tables E-2 and G-2. |
| Participant Costs | Yes | Customer contribution to the installation cost of the efficient measure. Customer costs included in Tables E-5 and G-5. |

| Costs of Energy Supply | | |
|---|---|---|
| **Cost** | **Included (Y/N)** | **Explanation** |
| Electric Energy Costs | Yes | Represents the cost of purchasing electric energy supply. |
| Electric Generation Costs | Yes | Represents cost of generation capacity in ISO-NE. |
| Electric Transmission Capacity Costs | Yes | Represents Pool Transmission Facilities (PTF) cost. |
| Electric Distribution Capacity Costs | Yes | Represents the cost of distribution capacity related to increased load. |
| Natural Gas Costs | Yes | Represents the cost of purchasing natural gas supply. |
| Fuel Costs | Yes | Non-regulated delivered fuels are an energy supply cost to customers that utilize these fuels for heating. The fuel costs in this category are separate from those embedded in the cost of |

Prepared by or under the supervision of: Carrie Gill and Michael O'Brien Crayne

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| Costs of Energy Supply | | |
|---|---|---|
| **Cost** | **Included (Y/N)** | **Explanation** |
| | | the electric market. While not a direct cost of electric energy supply, RI Energy includes incentives for delivered fuel energy efficiency measures in its Electric Portfolio. Therefore, to achieve symmetry with costs associated with electric energy efficiency, delivered fuels costs should be included in this comparison. |
| Water and Sewer Costs | No | While avoided water and sewer costs are a benefit of installing certain energy efficiency measures, they are not a direct cost of energy supply. |
| Non-Energy Impact Costs<br>• Income Eligible Rate Discount<br>• Arrearages<br>• Utility | No<br>Yes<br>Yes<br>Yes | With the exception of the three NEIs listed below, while non-energy impacts are a benefit of installing certain energy efficiency measures, they are not a direct cost of energy supply.<br>- Costs associated with energy being sold at the income eligible rate.<br>- Costs associated with arrearage carrying costs as a result of customers not being able to pay their energy bills.<br>- Costs associated with utility carrying costs as a result of customers encountering issues with utility services or paying their bills. |
| Price Effects | Yes | Represents costs associated with the impact of demand reduction on ISO-NE energy and capacity markets. |
| Non-embedded Greenhouse Gas Reduction Costs | Yes | Represents the social cost of carbon. The social cost of carbon is the cost associated with meeting the goals of the Act on Climate. Carbon emissions come from the production of energy and should be considered a cost of supplying that energy. |
| Economic Development | No | While economic development is a benefit of investment in energy efficiency measures it is not a direct cost of energy supply. |
| Non-embedded Nitrous Oxide (NOx) Costs | Yes | NOx emissions come from the production of energy and therefore the health impacts of NOx emissions should be considered part of the cost of supplying that energy. |
| Reliability Costs | Yes | Increased energy demand can lead to declining reserve margins and decrease reliability so should be associated with the cost of energy. |

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*Table 101. Costs of Energy Efficiency and Costs of Energy Supply*

| Benefits | Electric | Electric (RI Only) | Natural Gas | Natural Gas (RI Only) |
|---|---|---|---|---|
| Electric Energy | $51,762,507 | $33,640,472 | $337,539 | $274,416 |
| Electric Generation | $4,677,854 | $4,677,854 | $124,249 | $124,249 |
| Electric Transmission Capacity | $9,998,148 | $1,060,916 | $248,242 | $19,012 |
| Electric Distribution Capacity | $15,564,462 | $15,564,462 | $282,031 | $282,031 |
| Natural Gas | -$537,276 | -$537,276 | $28,377,765 | $28,377,765 |
| Delivered Fuel | $22,209,195 | $22,209,195 | $0 | $0 |
| Price Effects | $26,747,651 | $26,747,651 | $378,042 | $378,042 |
| Non-Embedded Greenhouse Gas Reduction | $30,035,690 | $30,035,690 | $19,820,251 | $19,820,251 |
| Non-Embedded NOx | $1,082,192 | $1,082,192 | $2,389,919 | $2,389,919 |
| Reliability | $139,395 | $139,395 | $1,010 | $1,010 |
| Income Eligible Rate Discount | $76,203 | $76,203 | $0 | $0 |
| Arrearages | $32,064 | $32,064 | $0 | $0 |
| Utility | $115,675 | $115,675 | $35,514 | $35,514 |
| **Cost of Supply** | **$161,903,761** | **$134,844,494** | **$51,994,562** | **$51,702,208** |
| Program Implementation Expenses | $92,229,404 | $92,229,404 | $33,255,011 | $33,255,011 |
| Customer Contribution | $17,495,754 | $17,495,754 | $6,854,409 | $6,854,409 |
| Shareholder Incentive | $4,079,089 | $4,079,089 | $904,972 | $904,972 |
| **Cost of EE** | **$113,804,247** | **$113,804,247** | **$41,014,392** | **$41,014,392** |
| **Difference** | **$48,099,514** | **$21,040,248** | **$10,980,170** | **$10,687,816** |

PUC 3-2

Request:

For each class and proposed MW allocation in PY 2024, 2025, and 2026, please calculation the following and present in a table:

a. Twenty-year (or fifteen-year) cost of each class's enrollment based on SEA's cost calculation (for example $/MW presented in Schedule 14 applied to the full class allocation);

b. Twenty-year (or fifteen-year) cost of each class's enrollment based on RIE's Response to PUC 2-2.

c. The projected market benefits of each class's enrollment based on SEA's benefits calculation using AESC 2021 the categories that are consistent with RI Energy's understanding of market value relevant to procurement of new generation (e.g., such as presented in Docket No. 4929).

d. The projected market benefits of each class's enrollment based on SEA's benefits calculation using AESC 2024 the categories that are consistent with RI Energy's understanding of market value relevant to procurement of new generation (e.g., such as presented in Docket No. 4929).

e. Projected value of the market products for each class's enrollment that was used to develop RI Energy's Response to PUC 2-2.

f. The results of subpart a-d, but converted to a cents/kWh using the lifetime kWh embedded in SEA's cost calculator or in response PUC 2-2 as applicable to the subpart.

Response:

PUC 3-2, Page 2

a. Please see Table 1[1] below:

**Table 1: Tariff Cost Per Sustainable Energy Advisors (SEA)[1]**

| Class | Tariff Duration (Years) | PY 2024 | PY 2025 | PY 2026 |
|---|---|---|---|---|
| Small Solar I | 15 | $20,934,481 | $21,467,831 | $24,505,792 |
| Small Solar II | 20 | $20,602,096 | $21,419,977 | $24,486,669 |
| Medium Solar | 20 | $25,301,457 | $33,489,274 | $41,553,585 |
| Commercial Solar I | 20 | $32,427,850 | $38,791,921 | $45,271,538 |
| Commercial Solar I CRDG | 20 | $2,375,464 | $2,249,066 | $2,169,673 |
| Commercial Solar II | 20 | $37,819,602 | $39,063,668 | $40,876,647 |
| Commercial Solar II CRDG | 20 | $4,029,082 | $3,811,613 | $3,658,937 |
| Large Solar | 20 | $41,197,149 | $51,613,944 | $61,944,228 |
| Large Solar CRDG | 20 | $15,792,240 | $14,833,647 | $14,247,172 |
| Large Solar II | 20 | $93,034,133 | $87,321,928 | $83,806,897 |
| Large Solar III | 20 | $40,755,356 | $76,563,066 | $73,916,642 |
| Large Solar IV | 20 | $0 | $0 | $96,889,795 |
| Wind | 20 | n/a[2] | n/a[2] | n/a[2] |
| Wind CRDG | 20 | n/a[2] | n/a[2] | n/a[2] |
| Anaerobic Digestion | 20 | n/a[2] | n/a[2] | n/a[2] |
| Small Scale Hydropower | 20 | n/a[2] | n/a[2] | n/a[2] |

Source(s): "Detailed BCA Results_23-44-REG_DPUC First Data Request_Revised BCA.xlsx" and Docket No. 23-44-REG, Recommendations for the 2024-2026 Renewable Energy Growth Program Years, Distributed-Generation Board & Office of Energy Resources (December 20, 2023), Table 6.
Note 1: Reflects Net Present Value.
Note 2: Cost calculations for non-solar classes have not been performed by SEA.

[1] On April 5, 2024, while finalizing its response to data request PUC 3-2, the Company identified a potential discrepancy in SEA's BCA cost calculation related to the tariff duration of the Small Solar II Class. Specifically, although the Small Solar II Class is proposed to have a 20-year tariff duration, SEA's BCA cost calculation appears to utilize a 15-year tariff duration. Based on a preliminary review of SEA's BCA cost calculation workpaper, it appears that the use of a 20-year term would increase the overall cost of Small Solar II relative to what is currently presented. The Company made SEA aware of this discrepancy and understands that SEA intends to refile its calculations prior to 4:00pm on April 8th.

PUC 3-2, Page 3

b. Please see Table 2 below:

**Table 2: Tariff Cost Per Company's Response to PUC 2-2[1]**

| Class | Tariff Duration (Years) | PY 2024 | PY 2025 | PY 2026 |
|---|---|---|---|---|
| Small Solar I | 15 | $37,933,081 | $40,066,486 | $47,108,478 |
| Small Solar II | 20 | $37,933,081 | $40,066,486 | $47,108,478 |
| Medium Solar | 20 | $38,332,007 | $51,722,195 | $65,251,140 |
| Commercial Solar I | 20 | $59,579,386 | $73,489,918 | $88,429,570 |
| Commercial Solar I CRDG | 20 | $3,393,808 | $3,301,298 | $3,278,176 |
| Commercial Solar II | 20 | $78,311,769 | $83,642,411 | $90,337,498 |
| Commercial Solar II CRDG | 20 | $6,325,066 | $6,163,190 | $6,093,802 |
| Large Solar | 20 | $64,696,102 | $83,486,299 | $103,201,557 |
| Large Solar CRDG | 20 | $24,687,431 | $23,993,639 | $23,727,681 |
| Large Solar II | 20 | $146,101,026 | $141,244,480 | $139,625,637 |
| Large Solar III | 20 | $64,002,310 | $123,841,865 | $123,148,077 |
| Large Solar IV | 20 | $0 | $0 | $161,422,268 |
| Wind | 20 | $11,122,364 | $10,902,649 | $10,902,650 |
| Wind CRDG | 20 | $12,111,000 | $11,891,307 | $11,946,242 |
| Anaerobic Digestion | 20 | $14,868,831 | $14,790,775 | $14,868,832 |
| Small Scale Hydropower | 20 | $24,680,215 | $24,102,055 | $24,174,325 |

Source(s): Company's Response to PUC 2-2.
Note 1: Consistent with PUC 2-2, amounts do not reflect net present value. Excludes administrative costs (i.e., reflects PBI payments only).

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c. Please see Table 3 below:

**Table 3: Market Value Per Sustainable Energy Advisors BCA (AESC 2021)[1]**

| Class | Tariff Duration (Years) | PY 2024 | PY 2025 | PY 2026 |
|---|---|---|---|---|
| Small Solar I | 15 | $7,905,141 | $8,421,272 | $9,884,564 |
| Small Solar II | 20 | $9,428,446 | $10,100,768 | $11,885,491 |
| Medium Solar | 20 | $10,526,664 | $14,629,742 | $19,576,813 |
| Commercial Solar I | 20 | $15,853,877 | $19,933,017 | $25,107,056 |
| Commercial Solar I CRDG | 20 | $1,056,925 | $1,049,106 | $1,091,611 |
| Commercial Solar II | 20 | $22,195,427 | $24,129,442 | $27,290,278 |
| Commercial Solar II CRDG | 20 | $2,113,850 | $2,098,212 | $2,183,222 |
| Large Solar | 20 | $32,748,334 | $52,415,330 | $77,392,388 |
| Large Solar CRDG | 20 | $11,762,707 | $13,103,833 | $15,478,478 |
| Large Solar II | 20 | $82,338,946 | $91,726,828 | $108,349,344 |
| Large Solar III | 20 | $35,288,120 | $78,622,995 | $92,870,866 |
| Large Solar IV | 20 | $0 | $0 | $123,827,821 |
| Wind | 20 | n/a[2] | n/a[2] | n/a[2] |
| Wind CRDG | 20 | n/a[2] | n/a[2] | n/a[2] |
| Anaerobic Digestion | 20 | n/a[2] | n/a[2] | n/a[2] |
| Small Scale Hydropower | 20 | n/a[2] | n/a[2] | n/a[2] |

Source(s): "2344-SEA Schedule 11_0.xlsx" and Docket No. 23-44-REG, Recommendations for the 2024-2026 Renewable Energy Growth Program Years, Distributed-Generation Board & Office of Energy Resources (December 20, 2023), Table 6.
Note 1: Reflects Net Present Value.
Note 2: Benefit calculations for non-solar classes have not been performed by SEA.

The Company included the following categories of SEA's benefits calculation to be consistent with its broad understanding of market value relevant to procurement of new generation:

1. Avoided Energy
2. Energy DRIPE – Intrastate
3. Energy DRIPE - Rest of Pool (ROP)
4. Avoided Capacity
5. Capacity DRIPE – Intrastate
6. Capacity DRIPE - ROP
7. Avoided Transmission
8. REC Value

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9. Electric-Gas Cross-DRIPE – Intrastate
10. Electric-Gas Cross-DRIPE – ROP
11. Electric-Gas-Electric Cross-DRIPE – Intrastate
12. Electric-Gas-Electric Cross-DRIPE – ROP

d. Please see Table 4 below:

**Table 4: Market Value Per Sustainable Energy Advisors BCA (AESC 2024)[1]**

| Class | Tariff Duration (Years) | PY 2024 | PY 2025 | PY 2026 |
|---|---|---|---|---|
| Small Solar I | 15 | $8,681,721 | $9,214,479 | $11,362,980 |
| Small Solar II | 20 | $9,703,870 | $10,433,990 | $12,924,427 |
| Medium Solar | 20 | $11,653,646 | $17,068,164 | $23,323,660 |
| Commercial Solar I | 20 | $17,581,402 | $23,290,808 | $29,955,247 |
| Commercial Solar I CRDG | 20 | $1,172,093 | $1,302,402 | $1,302,402 |
| Commercial Solar II | 20 | $24,613,963 | $28,194,136 | $32,560,051 |
| Commercial Solar II CRDG | 20 | $2,344,187 | $2,451,664 | $2,604,804 |
| Large Solar | 20 | $42,525,019 | $59,519,366 | $71,414,026 |
| Large Solar CRDG | 20 | $14,175,006 | $14,879,842 | $14,282,805 |
| Large Solar II | 20 | $99,225,045 | $104,158,891 | $99,979,637 |
| Large Solar III | 20 | $42,525,019 | $89,279,049 | $85,696,832 |
| Large Solar IV | 20 | $0 | $0 | $114,262,442 |
| Wind | 20 | n/a[2] | n/a[2] | n/a[2] |
| Wind CRDG | 20 | n/a[2] | n/a[2] | n/a[2] |
| Anaerobic Digestion | 20 | n/a[2] | n/a[2] | n/a[2] |
| Small Scale Hydropower | 20 | n/a[2] | n/a[2] | n/a[2] |

Source(s): "2344-SEA-Schedule14-RevCBC_3-15-24.xlsx" and Docket No. 23-44-REG, Recommendations for the 2024-2026 Renewable Energy Growth Program Years, Distributed-Generation Board & Office of Energy Resources (December 20, 2023), Table 6.
Note 1: Reflects Net Present Value.
Note 2: Benefit calculations for non-solar classes have not been performed by SEA.

The Company included the following categories of SEA's benefits calculation to be consistent with its broad understanding of market value relevant to procurement of new generation:

1. Avoided Energy
2. Energy DRIPE – Intrastate
3. Energy DRIPE - Rest of Pool (ROP)
4. Avoided Capacity

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5. Capacity DRIPE – Intrastate
6. Capacity DRIPE - ROP
7. Avoided Transmission
8. REC Value
9. Electric-Gas Cross-DRIPE – Intrastate
10. Electric-Gas Cross-DRIPE – ROP
11. Electric-Gas-Electric Cross-DRIPE – Intrastate
12. Electric-Gas-Electric Cross-DRIPE – ROP

e. Please see Table 5 below:

**Table 5: Market Value Per Company's Response to PUC 2-2[1]**

| Class | Tariff Duration (Years) | PY 2024 | PY 2025 | PY 2026 |
|---|---|---|---|---|
| Small Solar I | 15 | $4,099,271 | $4,554,748 | $5,465,691 |
| Small Solar II | 20 | $4,099,271 | $4,554,748 | $5,465,691 |
| Medium Solar | 20 | $11,267,189 | $15,774,043 | $20,280,920 |
| Commercial Solar I | 20 | $16,900,773 | $21,407,648 | $25,914,526 |
| Commercial Solar I CRDG | 20 | $1,126,708 | $1,126,708 | $1,126,708 |
| Commercial Solar II | 20 | $23,661,086 | $25,914,524 | $28,167,964 |
| Commercial Solar II CRDG | 20 | $2,253,438 | $2,253,438 | $2,253,438 |
| Large Solar | 20 | $33,801,545 | $45,068,735 | $56,335,906 |
| Large Solar CRDG | 20 | $11,267,189 | $11,267,189 | $11,267,190 |
| Large Solar II | 20 | $78,870,257 | $78,870,258 | $78,870,264 |
| Large Solar III | 20 | $33,801,545 | $67,603,091 | $67,603,096 |
| Large Solar IV | 20 | $0 | $0 | $90,137,454 |
| Wind | 20 | $5,901,719 | $5,901,720 | $5,901,720 |
| Wind CRDG | 20 | $5,901,719 | $5,901,720 | $5,901,720 |
| Anaerobic Digestion | 20 | $8,097,077 | $8,097,077 | $8,097,078 |
| Small Scale Hydropower | 20 | $7,510,293 | $7,510,293 | $7,510,294 |

Source(s): Company's Response to PUC 2-2.
Note 1: Consistent with PUC 2-2, amounts do not reflect net present value.

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f. Please see Table 1a[2] through Table 5a below:

**Table 1a: Tariff Cost Per kWh Per Sustainable Energy Advisors (SEA)[1]**

| Class | Tariff Duration (Years) | PY 2024 | PY 2025 | PY 2026 |
|---|---|---|---|---|
| Small Solar I | 15 | $ 0.28 | $ 0.26 | $ 0.25 |
| Small Solar II | 20 | $ 0.26 | $ 0.24 | $ 0.23 |
| Medium Solar | 20 | $ 0.21 | $ 0.20 | $ 0.19 |
| Commercial Solar I | 20 | $ 0.18 | $ 0.17 | $ 0.17 |
| Commercial Solar I CRDG | 20 | $ 0.20 | $ 0.19 | $ 0.18 |
| Commercial Solar II | 20 | $ 0.15 | $ 0.14 | $ 0.14 |
| Commercial Solar II CRDG | 20 | $ 0.17 | $ 0.16 | $ 0.15 |
| Large Solar | 20 | $ 0.11 | $ 0.10 | $ 0.10 |
| Large Solar CRDG | 20 | $ 0.13 | $ 0.12 | $ 0.11 |
| Large Solar II | 20 | $ 0.11 | $ 0.10 | $ 0.09 |
| Large Solar III | 20 | $ 0.11 | $ 0.10 | $ 0.10 |
| Large Solar IV | 20 | $ - | $ - | $ 0.10 |
| Wind | 20 | n/a[2] | n/a[2] | n/a[2] |
| Wind CRDG | 20 | n/a[2] | n/a[2] | n/a[2] |
| Anaerobic Digestion | 20 | n/a[2] | n/a[2] | n/a[2] |
| Small Scale Hydropower | 20 | n/a[2] | n/a[2] | n/a[2] |

Source(s): "Detailed BCA Results_23-44-REG_DPUC First Data Request_Revised BCA.xlsx" and Docket No. 23-44-REG, Recommendations for the 2024-2026 Renewable Energy Growth Program Years, Distributed-Generation Board & Office of Energy Resources (December 20, 2023), Table 6.
Note 1: Reflects Net Present Value.
Note 2: Cost calculations for non-solar classes have not been performed by SEA.

[2] On April 5, 2024, while finalizing its response to data request PUC 3-2, the Company identified a potential discrepancy in SEA's BCA cost calculation related to the tariff duration of the Small Solar II Class. Specifically, although the Small Solar II Class is proposed to have a 20-year tariff duration, SEA's BCA cost calculation appears to utilize a 15-year tariff duration. Based on a preliminary review of SEA's BCA cost calculation workpaper, it appears that the use of a 20-year term would increase the overall cost of Small Solar II relative to what is currently presented. The Company made SEA aware of this discrepancy and understands that SEA intends to refile its calculations prior to 4:00pm on April 8th.

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| Table 2a: Tariff Cost Per kWh Per Company's Response to PUC 2-2[1] | | | | |
|---|---|---|---|---|
| **Class** | **Tariff Duration (Years)** | **PY 2024** | **PY 2025** | **PY 2026** |
| Small Solar I | 15 | $ 0.36 | $ 0.35 | $ 0.34 |
| Small Solar II | 20 | $ 0.36 | $ 0.35 | $ 0.34 |
| Medium Solar | 20 | $ 0.33 | $ 0.32 | $ 0.31 |
| Commercial Solar I | 20 | $ 0.34 | $ 0.33 | $ 0.33 |
| Commercial Solar I CRDG | 20 | $ 0.29 | $ 0.29 | $ 0.28 |
| Commercial Solar II | 20 | $ 0.32 | $ 0.31 | $ 0.31 |
| Commercial Solar II CRDG | 20 | $ 0.27 | $ 0.27 | $ 0.26 |
| Large Solar | 20 | $ 0.19 | $ 0.18 | $ 0.18 |
| Large Solar CRDG | 20 | $ 0.21 | $ 0.21 | $ 0.21 |
| Large Solar II | 20 | $ 0.18 | $ 0.17 | $ 0.17 |
| Large Solar III | 20 | $ 0.18 | $ 0.18 | $ 0.18 |
| Large Solar IV | 20 | $ - | $ - | $ 0.17 |
| Wind | 20 | $ 0.20 | $ 0.20 | $ 0.20 |
| Wind CRDG | 20 | $ 0.22 | $ 0.22 | $ 0.22 |
| Anaerobic Digestion | 20 | $ 0.19 | $ 0.19 | $ 0.19 |
| Small Scale Hydropower | 20 | $ 0.34 | $ 0.33 | $ 0.33 |

Source(s): Company's Response to PUC 2-2.

Note 1: Consistent with PUC 2-2, amounts do not reflect net present value. Excludes administrative costs (i.e., reflects PBI payments only).

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| Table 3a: Market Value Per kWh Per Sustainable Energy Advisors BCA (AESC 2021)[1] | | | | |
|---|---|---|---|---|
| **Class** | **Tariff Duration (Years)** | **PY 2024** | **PY 2025** | **PY 2026** |
| Small Solar I | 15 | $ 0.11 | $ 0.10 | $ 0.10 |
| Small Solar II | 20 | $ 0.12 | $ 0.11 | $ 0.11 |
| Medium Solar | 20 | $ 0.09 | $ 0.09 | $ 0.09 |
| Commercial Solar I | 20 | $ 0.09 | $ 0.09 | $ 0.09 |
| Commercial Solar I CRDG | 20 | $ 0.09 | $ 0.09 | $ 0.09 |
| Commercial Solar II | 20 | $ 0.09 | $ 0.09 | $ 0.09 |
| Commercial Solar II CRDG | 20 | $ 0.09 | $ 0.09 | $ 0.09 |
| Large Solar | 20 | $ 0.09 | $ 0.10 | $ 0.12 |
| Large Solar CRDG | 20 | $ 0.09 | $ 0.10 | $ 0.12 |
| Large Solar II | 20 | $ 0.09 | $ 0.10 | $ 0.12 |
| Large Solar III | 20 | $ 0.09 | $ 0.10 | $ 0.12 |
| Large Solar IV | 20 | $ - | $ - | $ 0.12 |
| Wind | 20 | n/a[2] | n/a[2] | n/a[2] |
| Wind CRDG | 20 | n/a[2] | n/a[2] | n/a[2] |
| Anaerobic Digestion | 20 | n/a[2] | n/a[2] | n/a[2] |
| Small Scale Hydropower | 20 | n/a[2] | n/a[2] | n/a[2] |

Source(s): "2344-SEA Schedule 11_0.xlsx" and Docket No. 23-44-REG, Recommendations for the 2024-2026 Renewable Energy Growth Program Years, Distributed-Generation Board & Office of Energy Resources (December 20, 2023), Table 6.

Note 1: Reflects Net Present Value.

Note 2: Benefit calculations for non-solar classes have not been performed by SEA.

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| Table 4a: Market Value Per kWh Per Sustainable Energy Advisors BCA (AESC 2024)[1] | | | | |
|---|---|---|---|---|
| **Class** | **Tariff Duration (Years)** | **PY 2024** | **PY 2025** | **PY 2026** |
| Small Solar I | 15 | $ 0.12 | $ 0.11 | $ 0.12 |
| Small Solar II | 20 | $ 0.12 | $ 0.12 | $ 0.12 |
| Medium Solar | 20 | $ 0.10 | $ 0.10 | $ 0.11 |
| Commercial Solar I | 20 | $ 0.10 | $ 0.10 | $ 0.11 |
| Commercial Solar I CRDG | 20 | $ 0.10 | $ 0.11 | $ 0.11 |
| Commercial Solar II | 20 | $ 0.10 | $ 0.10 | $ 0.11 |
| Commercial Solar II CRDG | 20 | $ 0.10 | $ 0.10 | $ 0.11 |
| Large Solar | 20 | $ 0.11 | $ 0.12 | $ 0.11 |
| Large Solar CRDG | 20 | $ 0.11 | $ 0.12 | $ 0.11 |
| Large Solar II | 20 | $ 0.11 | $ 0.12 | $ 0.11 |
| Large Solar III | 20 | $ 0.11 | $ 0.12 | $ 0.11 |
| Large Solar IV | 20 | $ - | $ - | $ 0.11 |
| Wind | 20 | n/a[2] | n/a[2] | n/a[2] |
| Wind CRDG | 20 | n/a[2] | n/a[2] | n/a[2] |
| Anaerobic Digestion | 20 | n/a[2] | n/a[2] | n/a[2] |
| Small Scale Hydropower | 20 | n/a[2] | n/a[2] | n/a[2] |

Source(s): "2344-SEA-Schedule14-RevCBC_3-15-24.xlsx" and Docket No. 23-44-REG, Recommendations for the 2024-2026 Renewable Energy Growth Program Years, Distributed-Generation Board & Office of Energy Resources (December 20, 2023), Table 6.

Note 1: Reflects Net Present Value.

Note 2: Benefit calculations for non-solar classes have not been performed by SEA.

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| Table 5a: Market Value Per kWh Per Company's Response to PUC 2-2[1] | | | | |
|---|---|---|---|---|
| **Class** | **Tariff Duration (Years)** | **PY 2024** | **PY 2025** | **PY 2026** |
| Small Solar I | 15 | $ 0.04 | $ 0.04 | $ 0.04 |
| Small Solar II | 20 | $ 0.04 | $ 0.04 | $ 0.04 |
| Medium Solar | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Commercial Solar I | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Commercial Solar I CRDG | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Commercial Solar II | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Commercial Solar II CRDG | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Large Solar | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Large Solar CRDG | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Large Solar II | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Large Solar III | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Large Solar IV | 20 | $ - | $ - | $ 0.10 |
| Wind | 20 | $ 0.11 | $ 0.11 | $ 0.11 |
| Wind CRDG | 20 | $ 0.11 | $ 0.11 | $ 0.11 |
| Anaerobic Digestion | 20 | $ 0.10 | $ 0.10 | $ 0.10 |
| Small Scale Hydropower | 20 | $ 0.10 | $ 0.10 | $ 0.10 |

Source(s): Company's Response to PUC 2-2.

Note 1: Consistent with PUC 2-2, amounts do not reflect net present value.

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PUC 3-3

Request:

If the responses to PUC 3-2.c and PUC 3-2.d include some value of non-embedded GHG emissions after 2033, please explain why and as a sensitivity, please provide a response to PUC 3-2.c and PUC 3-2.d assuming no non-embedded GHG emissions value.

Response:

The responses to PUC 3-2.c and PUC 3-2.d do not include a value of non-embedded GHG emissions.

PUC 3-4

Request:

Absent the change in law to the Renewable Energy Growth Program, based on the current status of the 2023 Program Year, what would the capacity of the 2024 Program Year be, assuming 40 MW plus a 2023 rollover (and exclude any incremental enrollment in small scale solar subject to the motion to extend).

Response:

In Program Year 2023, the Annual Enrollment Target was 66.6 MW, and 7.8 MW of projects were awarded. The remaining Annual Enrollment Target was 58.8 MW. Pursuant to the question, 40 MW plus the rollover from the remaining Annual Enrollment Target of 58.8 MW, would be 98.8 MW.

Per the Rhode Island Renewable Energy Growth Program Solicitation and Enrollment Process Rules for Solar (Greater than 25 kW), Wind, Hydro, and Anaerobic Digester Projects, Program Year 2023, Section 1.2, annual MW targets are 40 MW per year from 2020 to 2029, and any cancelled or unused capacity from prior years may be added by the Board to the next program year. Pursuant to this methodology, the total MW target in 2024 would be 40 MW multiplied by five program years, or 200 MW. As of January 11th, 2023, the below table shows that there are currently 92.1 MW of projects built or pending that were awarded between Program Years 2020-2023, which would make the Program Year 2024 target 107.9 MW.

| RE Growth Projects Built or Pending | | | |
|---|---|---|---|
| **Year** | **Awarded Projects (MW)** | **Cancelled Projects (MW)** | **Projects Built or Pending (MW)** |
| 2020 | 44 | 15.4 | 28.6 |
| 2021 | 52.1 | 19.1 | 33 |
| 2022 | 25.5 | 2.8 | 22.7 |
| 2023 | 7.8 | 0 | 7.8 |
| **Total** | **129.4** | **37.3** | **92.1** |

Prepared by or under the supervision of: Kenneth Campbell and Erica Russell Salk

PUC 3-5

Request:

Inclusive of Long-Term Contracts, DG Standard Contracts, and the existing REG Program through 2023, what are the MW of solar and wind enrolled/contracted for?

Response:

Please see the below table, which details the solar and wind project capacity contracted for regarding Long-Term Contracts and DG Standard Contracts projects, and enrolled/built for the Renewable Energy Growth Program projects.

| **Rhode Island Energy<br>Solar and Wind Projects Enrolled/Contracted For** | | | |
|---|---|---|---|
| **Program** | **Solar Projects (MW)** | **Wind Projects (MW)** | **Total (MW)** |
| Long-Term Contracts | 18 | 529 | 547 |
| DG Standard Contracts | 23 | 2 | 24 |
| Renewable Energy Growth Program (Small-Scale Solar) | 54 | 0 | 54 |
| Renewable Energy Growth Program (Non-Small-Scale Solar) | 129 | 24 | 152 |
| **Total:** | **222** | **554** | **776** |

*****Long-term contracts is inclusive of Revolution Wind's 400 MW project.
******Renewable Energy Growth Program includes operational and pending projects, from Program Years 2015-2023. Project status for Small-Scale Solar projects is updated as of 4Q2023. Project status for Non-Small-Scale Solar is updated as of January 11, 2024.

Prepared by or under the supervision of: Erica Russell Salk and Kenneth Campbell