

Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02886

RE: Docket No. 24-06-EE - The Narragansett Electric Company's d/b/a Rhode Island Energy's System Reliability Procurement Investment Proposal for Electric Demand Response 2024-2026 - ConnectedSolutions

Sol Power, LLC is submitting these comments in response to the proposed changes to the Connected Solutions program in Rhode Island, as outlined in Docket 24-06. Specifically our comments relate to the Residential and Small Business (RSB) battery program.

Sol Power is a residential and small commercial solar provider based in RI. We have installed batteries for and enrolled approximately 215 customers in the Connected Solutions RSB battery program.

We believe the proposed decrease in the RSB battery incentives is too large and will result in a dramatic reduction in program enrollment. We recommend changing the incentive in small increments, not to exceed 10-20% per year, to avoid a shock to residential solar battery sales and installation companies.

Decreasing the incentive from \$400/kW to \$225/kW is a significant annual decrease. That's a 43.75% reduction in the current incentive. A change of that magnitude in incentive levels should be carried out over a few years. Otherwise we anticipate the decrease in solar battery sales and adoption to exceed the decrease in incentives, and would require a substantial decrease in the battery installation workforce to compensate.

Currently we are projecting 5 years of Connected Solutions incentive payments for our battery customers. The number of years of guaranteed enrollment are important to our customers. The "multi-year incentive" proposed would decrease the locked-in incentive period to 3 years. While we understand that the utility intends to offer enrollment beyond that period, we cannot sell batteries based on the utility's hopes and expectations. We will have to reduce our incentive payment projects to 3 years for our customers. This further exacerbates the decrease in incentives, bringing the total reduction to 66.25%. A single year decrease of that magnitude will certainly shock RBS battery uptake and the corresponding industry. We recommend providing the necessary framework to offer participants a 5 year incentive lock.

Right now we are in a period of uncertainty without a RBS Connected Solutions incentive. We do not know what incentive our customers would receive if we installed a battery system for them today. Therefore we cannot install batteries under the current conditions. The order of this process needs to be:

- 1) PUC docket is opened
- 2) Incentive level decision is reached by the PUC
- 3) Solar industry is provided a minimum of 3 months notice in the incentive change before implementation

Instead, the utility started the process by discontinuing enrollment before the new incentive levels were approved by the PUC. As a result we currently cannot sell or install batteries for our customers because we do not know what the incentives will be.

Thank you for your consideration of our comments. As proposed, the reduction in the Connected Solutions BSR battery incentive will result in a dramatic decrease in residential battery sales and installation. This will have a significant adverse effect on the companies installing residential batteries. We recommend the following changes to the proposal:

- Limit incentive value reductions to a maximum of 10-20% per year. Any larger decreases should be accomplished over a multi-year step down in incentives
- Structure the BSR battery program to provide a 5 year incentive lock for participants
- Provide the industry with a minimum of 3 months notice of any incentive changes after the PUC has approved of the program, before any changes are made to the incentive or enrollment

Sincerely,
Eric Beecher



President, Sol Power