



July 22nd, 2024

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

**Re: Docket No. 24-26-EL - Investigation into the Current State of Voluntary and Mandated Renewable Energy Markets in Rhode Island**

Dear Public Utilities Commission,

Green Energy Consumers Alliance submits the following comments to the Rhode Island Public Utilities Commission ("Commission") in the docket to explore whether voluntary renewable energy purchases could be counted toward meeting the State's Renewable Energy Standard ("RES").

Green Energy Consumers Alliance is a non-profit with a mission to empower consumers and communities to speed a just transition to a zero-carbon world. As part of our mission, we work with Good Energy LLC to supply more renewable energy to residents' electricity at a competitive price, through what we call Green Municipal Aggregation ("GMA"). We also have a Green Powered program for those who are not within a GMA community but want to add renewable energy to the power grid on their behalf.

We understand the purpose of this docket is to fulfill the requirements of RI Gen. Laws §36-26-4(c), which involves assessing the impact of allowing voluntary renewable energy purchases to count toward the mandatory RES annual percentages and reporting the findings to the governor and general assembly. We recognize that you are currently seeking comments on the scope of this docket.

However, we feel that the need to emphasize from the outset that we **strongly oppose** allowing voluntary renewable energy purchases to count towards meeting the RES. Further explanation is below in response to your questions.

**Questions from the Commission:**

**1. How might counting voluntary RECs toward the RES positively or negatively impact Rhode Island's RES and ability to meet the mandates of the Act on Climate?**

Counting voluntary RECs toward the RES would negatively impact Rhode Island's ability to meet the mandates of the Act on Climate. The purpose of voluntary RECs is to add additional renewable energy, not to fulfill the RES requirements. Adding additional renewable energy to the power grid

further increases demand for renewable energy, funds new sources of renewable power, and reduces our need to burn fossil fuels for electricity.

The Executive Climate Change Coordinating Council's ("EC4's") 2022 Climate Update indicates that Rhode Island is falling short of meeting the 2030 mandate of a 45% emissions reduction below 1990 levels, with modeling showing only a 40% reduction by 2030, assuming compliance with the 100% RES. We cannot risk failing to meet the RES, as the state is already not on track to meet its targets.

## **2. How might counting of voluntary RECs toward mandatory requirements impact customer choice and transparency?**

Customers making voluntary purchases expect that they will exceed the minimum requirements and therefore support more renewable energy use than would have happened otherwise. If voluntary purchases could be counted toward the RES minimum, then a customer might be paying more just to maintain the status quo or to subsidize every other electricity consumer.

To put it another way, folding voluntary RECs into the RES would simply eliminate the incentive of any ratepayer to participate in the voluntary market if the change was made transparently. If it was not made transparently, it would be a state-sanctioned form of greenwashing.

Allow us to introduce a metaphor. Imagine that a school district's budget includes funds for a field trip at a particular school. Then that school runs a bake sale to fundraise for a second field trip. Would it be appropriate for the school district to withdraw its commitment to the first field trip and utilize the funds from the bake sale? The answer is obviously no.

## **3. What verification and tracking mechanisms should be implemented to ensure accurate reporting, compliance, and transparency if voluntary RECs are counted towards the statewide RES reporting system?**

To repeat, it would be a travesty to count voluntary RECs towards the statewide RES.

## **4. What administrative and compliance challenges might arise from counting RECs toward the RES?**

See #3.

## **5. How might the inclusion of voluntary RECs in the RES affect the market, pricing, and availability of RECs?**

This is not germane.

## **6. What rationale is behind entities exceeding 100% renewable energy through procurement of voluntary RECs?**

The world is facing a climate crisis and Rhode Island is undoubtedly far behind meeting its obligations under the Act on Climate. There simply is no problem if an entity exceeds 100%

renewable energy. It's a benefit given that the state of Rhode Island's most recent GHG inventory shows that building, transportation, and electricity emissions increased from 2021 to 2022. Given that Rhode Island participates in a regional marketplace for RECs, there is no problem for a given "entity" or consumer to purchase and retire RECs greater than 100% of consumption until the entire region has reached 100% renewable energy. Until then, every new or Class I REC will displace fossil fuel generation.

**More about the Voluntary Market:**

We would like to make two additional points about the voluntary market. The first is that the focus must be on RECs that are defined by the RES as "new" in Rhode Island or Class I in other New England states. These are the RECs that create additionality and therefore reduce GHG emissions by causing reduced generation from fossil fuel-fired power plants.

The second point is that the voluntary market has produced and can continue to produce the most cost-effective and equitable GHG emission reduction of ANY state policy. The benefits are tangible and come at essentially no cost to taxpayers or ratepayers who do not want to participate. As administration officials and legislators look to solutions to our climate crisis, none will have greater benefit-cost ratios than what we find in the voluntary market for renewable energy.

Again, we strongly oppose allowing voluntary renewable energy purchases to count towards meeting the RES. Thank you for the opportunity to comment.

Sincerely,

Amanda Barker

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