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

2025 RENEWABLE ENERGY GROWTH PROGRAM TARIFF AND RULE CHANGES

Direct Pre-Filed Testimony and Schedules of:

Kimberly Gauntner and
Mark Garland

Submitted to:
Rhode Island Public Utilities Commission
RIPUC Docket No. 24-50-REG

Submitted by:

Rhode Island Energy™
a PPL company

Cover Letter

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November 26, 2024

VIA HAND DELIVERY AND ELECTRONIC MAIL

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: 2025 Renewable Energy Growth Program Tariff and Rule Changes
Docket No. 24-50-REG

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company"), I have enclosed for filing the direct pre-filed testimonies of Kimberly Gauntner and Mark Garland. Also enclosed are the following schedules to Ms. Gauntner's and Mr. Garland's testimonies:

1. Schedule RIE-1 – RIPUC No. 2151-K, Renewable Energy Growth Program for Residential Customers ("Residential Tariff") (Redlined and Annotated);
2. Schedule RIE-2 – RIPUC No. 2152-J, Renewable Energy Growth Program for Non-Residential Customers ("Non-Residential Tariff") (Redlined and Annotated);
3. Schedule RIE-3 – Solicitation and Enrollment Process Rules for Small-Scale Solar Projects ("Small Scale Solar Rules") (Redlined and Annotated);
4. Schedule RIE-4 – Solicitation and Enrollment Process Rules for Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Projects ("Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules") (Redlined and Annotated);
5. Schedule RIE-5: Rhode Island Energy Comments to Sustainable Energy Advantage ("SEA") on behalf of Rhode Island Office of Energy Resources ("OER") and the Distributed Generation Board ("DG Board") (October 9, 2024);

6. Schedule RIE-6: Rhode Island Energy Comments to SEA on behalf of OER and the DG Board (October 24, 2024);
7. Schedule RIE-7: Rhode Island Energy Presentation Given at DG Board Meeting (September 23, 2024); and
8. Schedule RIE-8: Rhode Island Energy Presentation Given at DG Board Meeting (November 4, 2024).

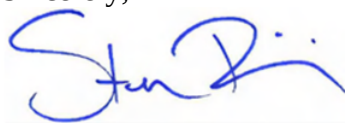
The Company is proposing several changes to the 2025 Renewable Energy Growth Program Tariffs and Rules, which are discussed in the Company's pre-filed testimony.

Specifically, Ms. Gauntner discusses the changes to the Residential and Non-Residential Tariffs (together, the "Tariffs") and Small Scale Solar Rules and Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules (together, the "Rules") that serve to: (1) add Large-Scale Solar classes to the Non-Residential Tariff and the Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules; (2) clarify the Non-Residential Tariff language on Performance Guarantee Deposits for extensions for Medium Scale Solar; (3) add additional requirements to the Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules regarding the submission of assessor's maps.

Mr. Garland's testimony discusses the changes to the Tariffs and Rules that serve to: (1) update and clarify language governing termination of Certificates of Eligibility; and (2) update URL links for Rhode Island Energy's website in the Rules.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Sincerely,



Steven J. Boyajian

Enclosures
cc: Docket 24-50-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

November 26, 2024
Date

Docket No. 24-50-REG – Renewable Energy Growth Program for Year 2025
The Narragansett Electric Company & RI Distributed Generation Board
Service List updated 11/15/2024

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Pre-filed Testimony of
Kimberly Gauntner

DIRECT PRE-FILED TESTIMONY

OF

KIMBERLY W. GAUNTNER

November 26, 2024

TABLE OF CONTENTS

I. Introduction

Q. Ms. Gauntner, please state your name and business address.

A. My name is Kimberly W. Gauntner. My business address is 827 Hausman Road, Allentown, PA 18104.

Q. By whom are you employed and in what position?

A. I am employed by PPL Services Corporation as the Manager of Clean Energy Procurement, working primarily in support of The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company"). In this role, I manage the team responsible for program management and administration of Renewable Energy Growth, as well as Long-Term Contracting Standards and administration and evaluation of the offshore wind RFPs. In addition, my team and I provide ad hoc technical, energy markets, and regulatory insight and background on existing, new, and proposed policy in both Rhode Island and Pennsylvania.

Q. Please describe your educational background and professional experience.

A. I earned a Bachelor of Electrical Engineering degree from the University of Dayton in 2005 and a Master of Science in Engineering Management from the New Jersey Institute of Technology in 2015.

Beginning in 2005, I worked in the semiconductor industry as an applications engineer. From 2006 to 2012, I worked as an electrical instrumentation and controls engineer in the nuclear power industry.

In 2012, I joined PPL Electric Utilities in the Distribution Planning department, first as an engineer (2012 – 2018) and then as the Supervising Engineer of that department (2018 – 2020). In those roles, I actively participated in developing or directly oversaw PPL Electric Utilities' five-year system plan for distribution, including identifying and scoping necessary system investments for the safe and reliable interconnection of renewable energy and large new load requests.

In 2020, I began working for a new department at PPL Electric Utilities, as the Supervising Engineer of Distribution Interconnections and Tariff Rules. In this role, I oversaw both renewable energy interconnection technical studies and the technical aspects of regulatory policies. In December 2023, I joined PPL Services Corporation in my current role as the Manager of Clean Energy Procurement at which time I assumed my role and responsibilities with respect to the Company

Q. Please describe your role in relation to the Company's 2025 Renewable Energy Growth Program Tariff and Rule Changes filing?

A. My role was to critically assess: (1) Solicitation and Enrollment Process Rules for Small-Scale Solar Projects ("Small-Scale Solar Rules"); (2) Solicitation and Enrollment Process Rules for Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Projects ("Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules" and together with the Small-Scale Solar Rules, the "Rules"); (3) RIPUC No. 2151-K, Renewable Energy Growth Program for Residential Customers ("Residential Tariff"); and (4) RIPUC No. 2152-K, Renewable Energy Growth Program for Non-Residential Customers ("Non-Residential Tariff" and together with the Residential Tariff, the "Tariffs"); for clarity, usability, accuracy, and alignment with statutory changes.

In performing this role, along with Company witness Mark Garland, we drew on our individual roles and experience as they pertain to the administration of the Company's Renewable Energy Growth Program: I mainly advised on Tariffs and Rules related to the Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester enrollment process. I also advised on compliance with state programs and policies, and business strategy. Mr. Garland primarily advised on Tariffs and Rules related to the administration of the small-scale renewable energy class and overall interconnection process.

Q. Have you previously testified before the Rhode Island Public Utilities Commission ("PUC" or "Commission")?

A. No, I have not.

II. Purpose and Structure of Testimony

Q. What is the purpose of this pre-filed testimony?

A. The purpose of my testimony is two-fold. First, it is to provide additional context and an explanation in support of the Company's proposed revisions to the Tariffs and Rules, which are listed below.

1. Addition of Large-Scale Solar to Solar Class List

A non-substantive change adding Large Scale Solar I, II, III, and IV to the introduction of the Non-Residential Tariff and section 2.3.1 of the Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules. This addition was implemented by statute as part of the 2023 modifications to R.I. Gen. Laws § 39-26.6 but was not previously captured in the Tariff or Rules redlines

2. Performance Guarantee Deposits for Medium-Scale Solar

A clarifying change to the Non-Residential Tariff language on Performance Guarantee Deposits for extensions for Medium Scale Solar. This change is limited

to updating the language for clarity on the amount for Performance Guarantee Deposits for Medium Scale Solar and when they are required.

3. Additional Requirement for Assessor's Maps

A substantive change to the Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules regarding the requirements for Assessor's Maps for Non-Small-Scale Solar projects. This change adds requirements for additional information to be shown on the assessor's map to aid in proper evaluation of projects for possible segmentation issues.

Second, it is to provide a summary of the Company's engagement during the Rhode Island Office of Energy Resources ("OER") stakeholder process ahead of the proposals made in this docket. In doing so, my testimony outlines the Company's analysis and recommendation on the Program Year ("PY") 2025 Megawatt ("MW") Allocation Plan. The Sustainable Energy Advantage ("SEA") was engaged by OER, in consultation with the Distributed Generation ("DG") Board, to develop proposed a MW Allocation Plan for PY 2025, prices for Small Solar I and II renewable energy classes, and a pilot program proposal for the 2025-2026 PY period for incentive-rate adders for eligible Solar projects sited on brownfields requiring remediation.

As discussed in greater detail below, the Company's recommendation is to reduce the combined MW allocation compared to what is being proposed by OER for renewable energy classes below 1 MW to a combined total of 30 MW to encourage more competition.

Q. How is your testimony organized?

A. Section I is the introduction. Section II explains the purpose and structure of my testimony. Section III explains the Company's proposed revisions to the Tariffs and Rules. Section IV explains the Company's position with respect to OER's recommendations for PY 2025 MW allocation plan and ceiling prices. Section V notes the Company's response to the OER's recommended Brownfield Adder Pilot. Section VI is the conclusion.

Q. Are you sponsoring any schedules with your testimony?

A. Yes, Mr. Mark Garland and I are sponsoring the following Schedules:

Schedule RIE-1: Small Scale Solar Rules – redlined and annotated

Schedule RIE-2: Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules – redlined and annotated

Schedule RIE-3: Residential Tariff – redlined and annotated

Schedule RIE-4: Non-Residential Tariff – redlined and annotated

Schedule RIE-5: Rhode Island Energy Comments to SEA on behalf of OER and the DG Board (October 9, 2024)

Schedule RIE-6: Rhode Island Energy Comments to SEA on behalf of OER and the DG Board (October 24, 2024)

Schedule RIE-7: Rhode Island Energy Presentation Given at DG Board Meeting (September 23, 2024)

Schedule RIE-8: Rhode Island Energy Presentation Given at DG Board Meeting (November 4, 2024)

The Company notes that Schedules RIE-1, RIE-2, RIE-3, and RIE-4 contain additional explanation mapped to proposed revisions via comments intentionally preserved in the right-hand margin.

III. Proposed Revisions to Tariffs and Rules

Q. Please summarize the proposed non-substantive changes to the Tariffs and Rules?

A. (1) Addition of Large-Scale Solar to Solar Class List

As shown in Schedule RIE-2 and Schedule RIE-4 respectively, in section 2.3.1 of the Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules, and in the "Introduction" of Non-Residential Tariff, the renewable energy classes of Large Scale I, II, III, and IV were added to the list of renewable energy classes which have 48 months,

following award of a Conditional Certificate of Eligibility, to meet all requirements to receive compensation under the Renewable Energy Growth Program.

Q. Why is the Company proposing this change?

A. This change was implemented by statute as part of the 2023 modifications to the Renewable Energy Growth statute (*see* R.I. Gen. Laws § 39-26.6-5(a)) but was not captured in the 2024 Program Year Tariff or Rules changes. This change is proposed to ensure that the list of solar classes presented in the Tariffs is both accurate and complete.

Q. Please summarize any proposed clarifying revisions to the Tariff or Rules.

A. (2) Performance Guarantee Deposits for Medium-Scale Solar

In the Performance Guarantee Deposit section of the Non-Residential Tariff, Schedule RIE-4, Section 3, sub-section (e) has been split into two sections. A new section for Medium Scale Solar Projects is being proposed as follows:

> f. Medium-Scale Solar Projects have the option to extend their 24-month deadline of achieving operation at expected capacity, as well as all other requirements under this Tariff, by two (2) additional six-month periods. For each six-month extension, a Deposit must be paid. Each deposit, for each extension is equal to $7.50 multiplied by the estimated RECs to be generated during the DG Project's first year of operation.

Q. Why is the Company proposing this change?

A. This change is to clarify and break out Medium-Scale Solar Project extension options for ease of reference. The language was modified to provide a clearer understanding of the two six-month options for extensions of the Medium-Scale Solar deadlines and the deposit that must be paid for each extension. Previously, this information was included in sub-section (e). The Company received questions from Renewable Energy Growth participants on the medium-scale deposits requirements and the timing of those deposits. Based on these experiences, the Company believes that separating out the process for Medium-Scale projects into a separate section and clarifying some of the language will assist in avoiding future questions or confusion.

Q. Please describe the proposed substantive revisions.

A. (3) Additional Requirement for Assessor's Maps

In section 1.2.2.3.4 of Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules, Schedule RIE-2, regarding Prohibition on Project Segmentation, Rhode Island Energy proposes modifying the current language requiring assessor's maps. This proposed change would require providing an assessor's map of the parcel for the DG project to be constructed, in addition to the location, size and renewable technology used for any other pending DG projects or projects which have received final Certificates of Eligibility in the past 24 months and had the same owner and/or developer. The Company proposes the following language:

All Applicants are required to include assessor's maps with their applications so that the Company can review project eligibility considering the prohibition on project segmentation. Assessor's maps must show the parcel location of the proposed project as well as the parcel location, size and renewable technology of any other pending renewable energy projects or projects which have received a final COE in the past 24 months and have the same owner and/or developer. The Company may also require additional property information to verify whether the project is eligible for participation in the program.

Q. Why is the Company proposing this change?

A. Currently, the Company receives assessor's maps as part of Renewable Energy Growth applications for Non-Small Scale Solar projects. However, there are no specific requirements concerning what must be shown on the map, such as identification of the parcel on which the DG project will be located. The intent of the proposed revisions to the assessor's map requirements is to enable the Company to review the project's location for possible segmentation concerns that could arise from projects on adjacent parcels. Currently, the assessor's maps provided to the Company do not typically provide the level of detail needed to evaluate segmentation concerns. With the additional requirements as proposed, a more thorough review of potential project segmentation issues is possible.

Q. Has the Company reviewed this proposed change with any stakeholders?

A. Yes. This proposed change was discussed with OER on November 8, 2024 and the DG Board during the November 4, 2024 meeting. Neither stakeholder expressed any concerns about this change during these discussions.

IV. Megawatt Allocation Plan Proposed by OER

Q. Have you had an opportunity to review the MW Allocation Plan Proposed by OER in its November 22, 2024 filing?

A. Yes, I have closely reviewed and analyzed the MW Allocation Plan proposed by OER.

Q. Did the Company have an opportunity to review and engage with OER and SEA regarding the MW Allocation Plan and provide feedback on the Plan ahead of OER's November 22, 2024, filing?

A. Yes, OER and SEA invited the Company to review and comment on the PY 2025 MW Allocation Plan. Additionally, OER invited Rhode Island Energy to present at the September 23, 2024 DG Board meeting. At this meeting, the Company presented on the historic enrollments, existing overall and net program costs, and current and historic residential bill impacts of the Renewable Energy Growth Program, including a comparison to other procurement activities as a primer to the Company's November 4, 2024 presentation on PY 2025 cost and bill impacts. The Company's slides accompanying its September 23, 2024 presentation are included as Schedule RIE-7.

The Company then filed comments, consistent with this pre-filed testimony, on October 9, 2024 and October 24, 2024 which are included in Schedule RIE-5 and RIE-6, respectively. Furthermore, the Company and SEA met on two occasions to review and discuss the Company's comments, concerns and questions as well as to review the large renewable projects in the Interconnection queue that could potentially bid into Large Scale Solar I, II, III or IV in PY 2025.

Additionally, on November 4, 2024, the Company made a presentation to the DG Board ahead of its vote on OER's proposal. The Company's slides accompanying its presentation are included as Schedule RIE-8.

Q. Does the Company wish to highlight any aspects of its November 4, 2024, presentation or written comments?

A. Yes, as directed by the PUC in Order No. 25148 in Docket No. 23-44-REG[1], the Company presented to the DG board the total program cost of the PY 2025, as proposed by OER, assuming 100 percent enrollment. The Company also provided an estimated residential bill impact through the end of the Renewable Energy Growth Program including the proposed PY 2025. To project the long-term customer bill impact, the MW

[1] On Page 33, paragraph 10, of Order No. 25141 dated August 29, 2024, issued in Docket No. 23-44-REG regarding the 2024-2026 Renewable Energy Growth Program, the Commission ordered as follows: "Rhode Island Energy shall provide to the DG Board for consideration of the Program Year 2025 components the following information based on SEA's allocation and ceiling price proposals during the development process: (1) overall cost of program; (2) value of market products (should include impact of other procurement activities); (3) net cost to ratepayers and bill impacts."

allocation and ceiling prices of PY 2025 were assumed to repeat for each future year of enrollments through 2033. The Company's tables including the overall program costs, the value of market products, net costs to ratepayers and corresponding bill impacts are all included in Schedule RIE-6.

Q. Is the Company in agreement with the MW Allocation Plan proposed by OER? Please explain.

A. As the Company noted in its written comments and at its November 4, 2024 presentation, the Company agrees in part, and disagrees in part, with OER's MW Allocation Plan as developed by SEA. As part of the Company's efforts to review SEA's proposed MW Allocation Plan during the planning process, the Company reviewed the historic Renewable Energy Growth Program enrollments for Small-Scale Solar, Medium-Scale Solar, Commercial-Scale Solar and Large-Scale Solar (including Community Remote DG) since the program's inception. Due to the number of pending projects in the Interconnection queue between 1 to 5 MW in size that may be eligible to bid into the Renewable Energy Growth Program in 2025, the Company generally agrees with the MW allocation plan for that renewable energy class as proposed by OER. In other words, there are sufficient projects and developer diversity to result in healthy competition for the Large-Scale Solar classes.

However, based on the historic enrollment information, included in Schedule RIE-6, the Company noted a significant drop in enrollment since 2022 for Medium, Commercial I and II and Large-Scale solar and an even greater drop in enrollment in 2023 and 2024 for Small-Scale Solar I and II. For example, in the nine years since the inception of the Renewable Energy Growth Program, the Company has not awarded more than 8.4 MW of combined capacity in the Commercial Scale I and II renewable energy classes (in Program Year 2019). OER's PY25 proposal includes a combined MW allocation of 21 MW in these same renewable energy classes.

Based on the data reviewed, the Company provided, through written comments to OER and SEA and in the November 4, 2024 presentation to the DG Board, a recommendation to reduce the MW allocations, from the 38.5 combined MW allocation proposed, to the statutory minimum of 30 MW for all renewable energy classes below 1 MW, to encourage more competition within each class. The following seven classes are below 1 MW: Small Scale I and II, Medium Scale, Commercial Scale I and II, and Commercial Scale Community Remote Distributed Generation (CRDG) I and II. The historic MW allocations and actual enrollments by year are shown in Schedule RIE-6. The Company is concerned that historic enrollments do not support this increased allocation at this time.

Instead, the Company believes its recommendation, shown in Table 1 below, provides for MW allocations much closer to recent historic enrollments, while still being in

compliance with Rhode Island law, R.I. Gen. Laws § 39-26.6-12(c), which requires allocating at least 30 MW to projects below 1 MW. As noted, the Company is in general agreement with the MW allocation for classes greater than 1 MW as proposed by OER.

Table 1. Recommended MW Allocation for REG 2025 Program Year

Renewable Energy Class	Plan A (MW)[2]	Plan B (MW)
Small Scale I (0 - 15kW)	9	9
Small Scale II (>15 - 25kW)		
Medium Scale (>25 - 250kW)	6	6
Commercial Scale I (>250 - 500kW)	6.5	6.5
Commercial Scale I (>250 - 500kW) CRDG	0.5	0.5
Commercial Scale II (>500 - <1000kW)	7	7
Commercial Scale II (>500 - <1000kW) CRDG	1	1
Large Scale I (1 - <5 MW)	20	10
Large Scale I (1 - <5 MW) CRDG	5	5
Large Scale II (5 - <10 MW)	30	0
Large Scale III (10 - <15 MW)	15	0
Large Scale IV (15 - <39 MW)	0	0
Wind*	3	3
Wind CRDG*		
Small Sale Hydro	1	1
Aerobic Digestion		
TOTAL	**104**	**49**

[2] OER proposed, and the DG Board approved, two separate Megawatt Allocation Plans, contingent on the completion of the third Affected System Operator (ASO #3). Plan A refers to the DG Board's recommended plan in the event that Rhode Island Energy finalizes ASO#3 results, including any required re-studies, by forty-five (45) days prior to the anticipated opening of the Third Open Enrollment window for the 2025 Program Year. Plan B refers to the DG Board's recommended plan in the event that Rhode Island Energy does not finalize ASO#3 results forty-five (45) days prior to the anticipated opening of the Third Open Enrollment window for the 2025 Program Year. The differences in Plan A and Plan B are limited to renewable energy classes 1 MW and larger due to the level of study required for projects of this size.

From the recommendations noted in Table 1 above, the Company calculated the total program cost, for the length of the tariff terms, of projects enrolled in Program Year 2025, assuming full program enrollment and 50% enrollment in Tables 2 and 3 respectively, below:

Table 2. 2025 REG Program Costs Assuming 100% Participation
(Rhode Island Energy's MW Allocation Plan Recommendation)

	Plan A	**Plan B**
MW Allocation	104 MW	49 MW
Tariff Term Program Cost for 2025 Enrollments[3]	$597,409,991	$341,918,897
Tariff Term Net Cost to Customer for 2025 Enrollments[4]	$353,479,031	$228,941,177

Table 3. 2025 REG Program Costs Assuming 50% Participation
(Rhode Island Energy's MW Allocation Plan Recommendation)

	Plan A	**Plan B**
MW Allocation	104 MW	49 MW
Tariff Term Program Cost for 2025 Enrollments	$298,704,995	$170,959,448
Tariff Term Net Cost to Customer for 2025 Enrollments	$176,739,515	$114,470,588

[3] The Tariff Term Program Costs for 2025 Enrollments are an estimate based on the average capacity factors for each renewable energy type.

[4]The Tariff Term Net Cost to Customer for 2025 Enrollments is an estimate based on an assumed year-long average market value for energy. Energy market values can be highly variable.

Q. Did the DG Board approve a reduced MW allocation to solar renewable energy classes below 1 MW consistent with the Company's recommendations?

A. No, in its November 22, 2024 filing, the DG Board is recommending a 38.5 MW combined total for renewable energy classes below 1 MW. As noted, both in the Company's October 24, 2024, comments and in its November 4, 2024, presentation, the Company recommends that the allocation for projects below 1 MW not exceed the statutory minimum of 30 MW in light of the historical data regarding enrollment in these classes.

V. Brownfield Adder Pilot as Recommended by OER

Q. Have you reviewed the Brownfield Adder Pilot Plan recommend by OER in its November 22, 2024 filing?

A. Yes, I have.

Q. Is the Company proposing changes to its Rules and Tariffs consistent with the proposal at this time? Please explain.

A. The Company is not proposing changes to the Rules and/or Tariffs regarding the proposed brownfields adder at this time. The Company has, however, included place holders in the redlines of the Non-Residential Tariff, Schedule RIE-4, and Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules, Schedule RIE-2, where the requirements and process for the brownfield adder would be included, if so directed by

the Commission. The Company believes it is premature to propose specific language to the applicable Rules and Tariffs as the DG Board's proposal has not been fully vetted by the Commission or the parties in this proceeding. Additionally, the Company has not had the occasion to consult with OER and the Rhode Island Department of Environmental Management ("DEM") on how the pilot should be executed (by DEM) and administered (by the Company), if approved by the Commission. The Company, therefore, does not have specific language outlining a process to propose at this time. However, the Company can work with the parties in this docket in consultation with DEM, or in any manner the Commission may deem appropriate and necessary, to develop a proposal for the Commission's review. Additionally, while the Company raised several questions about the adder to OER and SEA during the stakeholder process, the Company has not taken a position on whether it is in support of the proposed adder at this time.

VI. Conclusion

Q. Does this conclude your testimony?

A. Yes, it does.

Pre-filed Testimony of
Mark Garland

DIRECT PRE-FILED TESTIMONY

OF

MARK R. GARLAND

November 26, 2024

TABLE OF CONTENTS

I. Introduction

Q. Mr. Garland, please state your name and business address.

A. My name is Mark Garland. My business address is 280 Melrose Street, Providence, Rhode Island, 02907

Q. By whom are you employed and in what position?

A. I am employed by The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company") as a Supervisor of Customer Energy Integration ("CEI"). I am responsible for general compliance with operable program rules, tariffs and statutes and interconnection applications as well as the day-to-day operations of the CEI team.

Q. Please describe your educational background and professional experience.

A. I received a Bachelor of Science from Bridgewater State University in 2010 and was employed in the aviation industry for approximately five years. I was first employed by National Grid USA ("National Grid") in 2015 in for a temporary role as a collections agent for Rhode Island electric customers. The temporary position was extended for the winter of 2015-2016 and I was later hired on a permanent basis.

In early 2016, I assumed a role as an Order Processing Representative. In that role, my main responsibilities were to receive calls from electricians and contractors looking to set

up work request for various needs, including new services, revamps, outages, rubber ups and unlock meter requests.

In 2017, I was hired to a new role within National Grid as a Commercial Connections Representative position for Central New York. In this role, I managed work request for commercial services, temporary installations and coordinated outages and worked with various departments within National Grid, including the distribution design group, scheduling, metering, and engineering.

In 2019, I joined National Grid's CEI team for a pilot program aimed at managing construction work requests of Distributed Generation Interconnections. In 2022, I was promoted to supervisor within the CEI department to oversee the "Simplified Team," which is a group of individuals organized to streamline processes and who manage, review, and approve applications under the simplified process as outlined in the Company's Standards for Connecting Distributed Generation in RIPUC No. 2258. On May 25, 2022, PPL Rhode Island Holdings, LLC acquired 100 percent of the outstanding common stock of the Company at which time I assumed current role and have continued to support and oversee the Company's CEI team.

Q. Please describe your role in relating to the Company's 2024 Renewable Energy Growth Program Tariff and Rule Changes filing?

A. My role with respect to the Company's filing was to critically assess: (1) Solicitation and Enrollment Process Rules for Small-Scale Solar Projects ("Small-Scale Solar Rules"); (2) Solicitation and Enrollment Process Rules for Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Projects ("Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules" and together with the Small-Scale Solar Rules, the "Rules"); (3) RIPUC No. 2151-K, Renewable Energy Growth Program for Residential Customers ("Residential Tariff"); and (4) RIPUC No. 2152-K, Renewable Energy Growth Program for Non-Residential Customers ("Non-Residential Tariff" and together with the Residential Tariff, the "Tariffs"); for clarity, usability, accuracy, and alignment with statutory changes.

In performing this role, along with Company witness Kimberly Gauntner, we drew on our individual roles and experience as they pertain to the administration of the Company's Renewable Energy Growth Program. Specifically, I advised on Tariffs and Rules related to the administration of the small-scale renewable energy class and overall interconnection process. Ms. Gauntner advised on Tariffs and Rules related to the Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester enrollment process. Ms. Gauntner also advised on compliance with state programs and policies, and business strategy.

Q. Have you previously testified before the Rhode Island Public Utilities Commission ("PUC" or "Commission")?

A. No, I have not.

II. Purpose and Structure of Testimony

Q. What is the purpose of this pre-filed testimony?

A. The purpose of my testimony is to provide additional context and an explanation in support of the proposed revisions to the Tariffs and Rules.

Q. How is your testimony organized?

A. Section I is the introduction and includes a summary of my background and experience. Section II explains the purpose and structure of my testimony. Section III explains the Company's proposed revisions to the Tariffs and Rules. Section IV is the conclusion.

Q. Are you sponsoring any schedules with your testimony?

A. Yes, Kimberly Gauntner and I are sponsoring the following Schedules:

Schedule RIE-1: Small Scale Solar Rules – redlined and annotated

Schedule RIE-2: Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules – redlined and annotated

Schedule RIE-3: Residential Tariff – redlined and annotated

Schedule RIE-4: Non-Residential Tariff – redlined and annotated

Schedule RIE-5: Rhode Island Energy Comments to Sustainable Energy Advantage ("SEA") on behalf of Rhode Island Office of Energy Resources ("OER") and the Distributed Generation Board ("DG Board") (October 9, 2024)

Schedule RIE-6: Rhode Island Energy Comments to SEA on behalf of OER and the DG Board (October 24, 2024)

Schedule RIE-7: Rhode Island Energy Presentation Given at DG Board Meeting (September 23, 2024)

Schedule RIE-8: Rhode Island Energy Presentation Given at DG Board Meeting (November 4, 2024)

III. Proposed Revisions to Tariffs and Rules

Q. Please describe the proposed clarifying revisions to the Rules and the Tariffs.

A. In addition to the proposed revisions described in the pre-filed testimony of Company witness Kimberly Gauntner, the Company also proposes the following changes to the Tariffs and Rules: (1) to update and clarify language regarding the termination of a Certificate of Eligibility ("COE") in the Tariffs; and (2) to update URL links for Rhode Island Energy's webpage in the Rules.

(1) Proposed COE Termination Language

The Company proposes to amend the first paragraphs of section 9 in both Tariffs to make the termination language clearer to the developer and customer community. These proposed revisions are intended to clarify to developers that termination of a COE is not automatic, and that it requires a formal request and explanation of the circumstances surrounding the request. The Company is proposing the following language for both Tariffs (the proposed additional new text is underlined):

> The Applicant and the Customer shall comply with the provision of this Tariff through the end of the term specified in the applicable Tariff supplement. The Applicant and the Customer may not terminate their obligations under this Tariff unless and until the Company consents to such termination. <u>A formal request for termination must be submitted to the Company. Termination will be granted if the Applicant cannot fulfill the obligations because of an event or circumstance that is beyond the Applicant's reasonable control and for which the Applicant could not prevent or provide against by using commercially reasonable efforts. If these two conditions are met</u>, the Company will not unreasonably delay or withhold its consent to an Applicant's request to terminate.

(2) <u>Proposed URL Updates</u>

The Company is proposing to update the URLs links in the sections of the Rules listed below. The Company is currently in the process of transitioning information and documentation to its updated Rhode Island Energy website. Once this process is finalized and the webpage becomes active online, the Company will update the links contained in the sections of the Rules listed below with the appropriate updated URL links to the pages where the related documentation can be found. At this time, the Company has

simply added annotation to applicable documents noting that it will update the URLs at a later date as the Company's website is still in the process of being constructed.

- Update to the URL link of section 1.2.2.3.5 of the Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules
- Update to the URL link in section 2.1.1 of the Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules
- Update to open Enrollment website URL in section 3.2 of the Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Rules
- Update to URL link in section 1.2.2.2. Eligible Applicant REG Small Scale Rules
- Update to URL link in Section 2.2 Interconnection Application Prior to Enrollment REG Small Scale Rules
- Update to URL link in Section 2.2.3 Energy Storage Systems REG Small Scale Rules

Q. Why is the Company proposing these changes?

A. The Company is proposing to update the language in the Rules regarding the termination of COEs to eliminate ambiguity. The existing language could arguably have been read to imply that the Company must terminate a Certificate of Eligibility upon request without delay. The proposed new language clarifies the process for requesting the termination of a COE and sets forth the requirements a developer must meet in order for the Company to agree to any termination request.

With respect to updates to the URL links as described above, the changes are clerical. The Company is proposing these changes because it is still in the process of completing construction of its website. When that process is completed new URLs through which the listed materials can be accesses will become active. The Company has submitted the proposed revised Rules without actual URLs specified because the Company anticipates that its website construction will be completed before the inception of Planning Year 2025 such that any temporary URLs would obsolete. Therefore, the Company included placeholders that will be updated with finalized URLs to the relevant website pages when the Company makes its compliance filing in this docket.

IV. Conclusion

Q. Does this conclude your testimony?

A. Yes.

REDLINED VERSION

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

Rhode Island Renewable Energy Growth Program

Solicitation and Enrollment Process Rules for Small-Scale Solar Projects

Effective Date: ~~MAY~~ APRIL 1, 2024~~4~~5

Table of Contents

I. Introduction and Overview

Rhode Island Energy (the Company) would like to welcome you to the Rhode Island Renewable Energy Growth Program (RE Growth Program). The RE Growth Program seeks to make it easy and attractive to install solar photovoltaic (PV) systems at the homes and businesses of Rhode Island Energy's customers. An applicant (Applicant) to the RE Growth Program may be a solar developer or a Rhode Island Energy customer.

Residential customers or their developers may apply for the RE Growth Program on a first-come, first-served basis. The Standard Performance-Based Incentive (PBI) Payment will be the fixed per-kWh Performance-Based Incentive from the applicable Tariff applied to the measured kWh produced by the Project. These solar systems will earn "Bill Credits" for the customer from the energy produced and used. The value of the Bill Credits will be removed from the PBI payment amount, and the remainder of the PBI payment will be paid to the customer. This program year's Standard PBIs are listed in Schedule 2 in this document.

Non-residential customers or their developers may also apply to the RE Growth Program on a first-come, first-served basis. These solar systems will have the option to receive the entire incentive payment directly or a combination of a direct payment and a Bill Credit for the customer, as specified in the Non-Residential Tariff.

This document provides information on the Solicitation and Enrollment Rules necessary to participate and enroll in the RE Growth Program.

1.1 Purpose of the Solicitation and Enrollment

The RE Growth Program was developed pursuant to Chapter 26.6 of Title 39 of the Rhode Island General Laws to facilitate the development of and compensation paid to distributed generation (DG) projects in Rhode Island. These Solicitation and Enrollment Process Rules for Small-Scale Solar Projects (Rules) provide the means by which a project can qualify for and enroll in the RE Growth Program. The Rules are only part of the RE Growth Program documents and should be read along with the Company's RE Growth Program Tariff for Residential Customers and the RE Growth Program Tariff for Non-Residential Customers (together, the Tariffs). Any term not defined in the Rules is defined in the Tariffs.

A Small-Scale Solar Project is a solar project with a nameplate generating capacity up to and including twenty-five kilowatts (25 kW). A Small-Scale Solar DG Project's nameplate capacity is the total rated power output of all solar panels measured in direct current (DC).

Under the RE Growth Program, Rhode Island Energy will not execute individual Power Purchase Agreement contracts with Applicants.

1.2 Enrollment Framework

Rhode Island Energy is operating the RE Growth Program, as guided by the Distributed Generation Board (Board) in consultation with the Rhode Island Office of Energy Resources (OER). The RE Growth Program is subject to the approval of the Rhode Island Public Utilities Commission (Commission). Rhode Island Energy may also consult with the Rhode Island Division of Public Utilities and Carriers (Division). For each program year, there will be a target amount of megawatts (MW) to be enrolled for the year (annual MW target) for each renewable energy class, which will be based on the projects' aggregate nameplate capacity. The nameplate capacity of a solar project is the total rated power output of all solar panels measured in DC. A "program year" means a year beginning April 1 and ending March 31.

If there is an over-subscription in one class and an under-subscription in an enrollment MW target, then Rhode Island Energy, the OER, and the Board may mutually agree to allocate megawatts from one class to another class within the RE Growth Program without Commission approval as long as the re-allocated targets would not exceed the annual MW Target. The reallocation of MW capacity from a competitively bid class to the Small-Scale Solar class may only occur after the final enrollment of the program year. For each program year, the Board will recommend the Standard Performance-Based Incentive (PBI) for each renewable energy class, subject to Commission approval. Small-scale solar projects will receive a Standard PBI under the tariff, further described in Section 2.1. See Schedule 2 for the approved Standard PBIs for the current program year.

1.2.1 Applications

During each program year, Applicants can enroll at any time until the annual MW target for the Small-Scale Solar Project class has been met, including the possible availability of additional capacity under the annual MW target. Applicants may elect to participate in the RE Growth Program within their application for interconnection, pursuant to the Company's Standards for Connecting Distributed Generation tariff. There is no separate enrollment application for Small-Scale Solar Projects.

To be eligible to receive approval for the current program year's tariff rates and capacity allocations, Small-Scale Solar Applicants must submit and the Company must receive all required forms and documentation, as listed on the RE Growth application checklist, and all must be filled out and signed with no deficiencies of information, by 4 p.m. Eastern Prevailing Time on March 31, ~~2022~~2025. Any application which is found to be missing required forms or information that is supplied after that time and date will considered for participation in the following program year at that year's tariff rates and class allocations.

Applicants will be selected for the RE Growth Program in accordance with the provisions below.

1.2.2 Eligibility Requirements

1.2.2.1 Introduction

To be eligible, a Small-Scale Solar Project must meet certain requirements, and Rhode Island Energy will review the interconnection application to determine whether the project meets these requirements. Projects that do not meet eligibility requirements will be disqualified from the RE Growth Program.

1.2.2.2. Eligible Applicant

An Applicant must be in good standing with regard to obligations to Rhode Island Energy. Such obligations include but are not limited to being current with amounts due on the electric service account(s) or fulfilling the requirements of an approved payment plan.

Self-installers, and new installers who have not installed an RE Growth Small-Scale project prior to the 2019 Program Year will be required to complete mandatory training through a webinar prior to submitting an interconnection application. The training, offered by the Rhode Island Office of Energy Resources, will be a recorded webinar that discusses the Minimum Technical Requirements and the unique interconnection requirements of the RE Growth Program. A Certificate of Completion, indicating that the installer has completed the training, must be submitted with the interconnection application.

A completed and signed Consumer Disclosure Form is required with all residential applications at the time of submission. There are separate forms for Customer-Owned systems, Third-Party Owned systems, and Self-Installed systems. These forms may be found on the RE Growth Program website at: ~~https://ngus.force.com/s/article/Rhode-Island-Renewable-Energy-Growth-Program~~https.

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1.2.2.3 Eligible Facilities

To be eligible as a Small-Scale Solar Project, a project must: (1) be a Small-Scale Solar renewable energy resource; (2) have a nameplate capacity equal to or less than 25 kW; and (3) interconnect with the Company's electric power system. A Small-Scale Solar Project's nameplate capacity is the total rated power output of all solar panels measured in DC.

Before applying to the RE Growth Program, a project must not be: (1) already operating; or (2) under construction, except for preparatory site work that is less than twenty-five percent (25%) of the estimated total project cost.

Residential

To be eligible as a Residential Small-Scale Solar Project, a project must be located at a Rhode Island Energy customer's residence where the residential customer receives electric service under either Basic Residential Rate A-16 or Low Income Rate A-60. The project must meet the sizing requirements as defined in the Residential RE Growth Tariff.

Non-Residential

Any Small-Scale Solar Project that is not eligible to enroll as a Residential Small-Scale Solar Project will be enrolled as a Non-Residential Small-Scale Solar Project. Note that these projects

may also be configured to receive Bill Credits under this program if they are sized as defined in Section 8.c. of the Non-Residential RE Growth Tariff, but are not required to do so. These projects will receive electric service pursuant to the appropriate general service retail delivery service tariff.

1.2.2.3.1 Prohibition on Project Segmentation

Project segmentation occurs when one distributed generation project is divided or segregated into multiple projects on a single parcel or on contiguous parcels in order to qualify under smaller size project classifications. The Company may also require additional property information to verify that the project is eligible for participation in the program.

Under the RE Growth Program, project segmentation is not allowed. However, a project developer may designate an additional distributed generation unit or portion of a unit on the same parcel or on a contiguous parcel for net metering or for other means of participating in electricity markets, as long as any such unit or portion of such unit: (1) is not receiving Performance-Based Incentives through the RE Growth Program; (2) is segregated electrically; and (3) is separately metered.

A distributed generation project is not considered segmented if: (1) at least twenty-four (24) months elapse between the operating start-date of the distributed generation project and the start of construction of new distributed generation unit(s) on the same parcel or a contiguous parcel; or (2) the distributed generation projects use different renewable resources. In addition, DG projects installed on contiguous parcels or a single parcel will not be considered segmented if they serve different customers and both customers opt to receive Bill Credits under Option 2 as described in Section 8.c. of the Non-Residential RE Growth Tariff. In addition, if the separate projects on a single parcel in aggregate would not qualify the facilities as a larger class, then they will not be considered segmented, and would be allowed. For example, if a developer proposes a 12 kW and a 12 kW on the same parcel (totaling 24 kW together), this would be the same class and ceiling price as the projects are subject to individually.

1.2.2.3.2 Compliance with Sizing Limitations to Receive Bill Credits

In accordance with the Tariffs, Non-Residential Applicants for Small-Scale Solar Projects that have on-site load may receive a credit on their electric bill based upon the value of the on-site use, provided that the DG Project meets the sizing requirements as defined in the Non-Residential RE Growth Tariff. All Residential customers will receive Bill Credits and must meet the sizing limitations defined in the Residential RE Growth Tariff. The Project must be reasonably designed and sized to produce electricity at an annual level equal to or less than 1) the Residential Customer's On-Site Use as measured over the previous three (3) years at the electric service account located at the Residential Customer's service location; 2) the annualized On-Site Use over the period of service to the Residential Customer's service location if such service has been provided for less than three years; or 3) a reasonable estimate of annual On-Site Use if the Project is located at a new service location.

II. Interconnection Application, Selection, and Enrollment Process

2.1 Performance-Based Incentive (PBI) Payments for Small-Scale Solar Projects

Applicants may elect to enroll in the RE Growth Program within their interconnection applications.

Residential

The PBI is a price per kilowatt-hour for all of the Renewable Energy Certificates (RECs) and any other environmental attributes or market products that are created or produced by the facility for as long as the facility is enrolled in the RE Growth Program, less the value of Bill Credits for the energy and capacity value that is deemed to be used on site by the customer and must be deducted from the value listed in the Supplements.

Non-Residential

The PBI is a price per kilowatt-hour that will be paid for all of the energy, capacity, RECs, and other environmental attributes and market products that are created or produced by the facility for as long as the facility is enrolled in the RE Growth Program. The Applicant and/or Bill Credit Recipients will have the option to receive the entire incentive payment directly or a combination of a direct payment and a Bill Credit for the customer, as specified in the Non-Residential Tariff.

2.2 Interconnection Application Prior to Enrollment

To apply, a prospective participant must submit an application for interconnection and elect to participate in the RE Growth Program. All interconnection costs must be paid by the Applicant of the distributed generation (DG) project.

For information regarding the interconnection process and the standards for the interconnection of generators in Rhode Island, please see: https://portalconnect.rienergy.com/RI/s/article/Rhode-Island-Renewable-Energy-Growth-ngus.force.com/s/article/Rhode-Island-Renewable-Energy-Growth-Program

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2.2.1 Site Control and Other Considerations

The Applicant must show actual control of the site where the Small-Scale Solar Project is to be located, or show it has exercised its right to acquire control of the site. To meet this requirement, the Applicant must represent that it owns or leases (or has an executed, exclusive, unconditional option to own or lease) the site (or residence in the case of a Residential Small-Scale Solar Project) on which the project will be located, and that it has any additional rights required to develop and operate the project at the site.

As per the definition in the Non-Residential RE Growth Program Tariff, no renewable distributed generation project that is located or planned to be located in or on a core forest, shall be considered an eligible renewable distributed generation project or otherwise be eligible to

participate in this program, unless it is on a preferred site. The Applicant must provide a signed letter, or other form of approval, from the Rhode Island Department of Environmental Management (RI DEM), that the renewable distributed generation project is not located or planned to be located in or on a core forest, unless it is on a preferred site, which must also be specified in the documentation from the RI DEM. For facilities developed in core forests on preferred sites, no more than one hundred thousand square feet (100,000 sq. ft.) of core forest shall be removed, including for work required for utility interconnection or development of a brownfield, in which case no more core forest than necessary for interconnection or brownfield development shall be removed. RI DEM may make their preferred site determinations in consultation with other relevant state agencies. Alternatively, if the RI DEM provides a list of project types that are waived from their review process, the Applicant may provide a self-certification form that confirms the renewable distributed generation project is one of the aforementioned project types.

All signed letters, or other forms of approval from RI DEM, should include basic project details, such as the project name, developer name, facility address, preferred site type, and RIE interconnection case number, for easy reference and verification during the bid evaluation process.

2.2.2 Total Project Cost

Applications must include the estimated total project development costs. Applications that do not include the estimated total project development costs will be rejected. Total project development cost is defined as: "The total cost of the solar equipment, design, development, construction, interconnection, permitting, financing (if known), and labor necessary to install the solar PV project. This figure should not account for any tax incentives, grants, or other cash incentives. Additional costs, indirectly related to the solar project, such as roofing work, should not be included."

2.2.3 Energy Storage Systems

Energy Storage Systems (ESS), such as electro-chemical batteries, that can store and release electrical energy, may be co-located with RE Growth qualifying projects. When located behind the-meter of a customer and able to charge from the electric power system, ESS must be configured in a manner that they cannot export through the RE Growth production meter. When configured to charge directly from the RE Growth system, ESS must be configured so that any energy used for back-up supply purposes is not measured by the RE Growth production meter. Please see the available "ESS Guidance Diagrams" available on the RE Growth webpage at: ngus.force.com/s/article/Rhode-Island-Renewable-Energy-Growth-Program

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2.3 Issuance of Certificates of Eligibility

Rhode Island Energy shall award Certificates of Eligibility to the selected Small-Scale Solar Projects. Rhode Island Energy is not required to obtain Commission confirmation or approval in awarding Certificates of Eligibility to Small-Scale Solar Projects. Certificates of Eligibility given to Small-Scale Solar Projects are subject to the review and consent of the OER. Rhode Island Energy files a list of all awarded certificates with the Commission. Certificates of Eligibility will

be awarded to eligible Small-Scale Solar Projects on a "first come, first served" basis until the annual MW target for the Small-Scale Solar class is fully subscribed.

The Certificate of Eligibility will contain applicable project information, including renewable technology and class, project capacity and energy output, term length, price, certificate issuance, and certificate effective dates.

2.4 Project Schedule

All Small-Scale Solar Projects have twenty-four (24) months to meet all other requirements pursuant to Section 6.a. of the Tariff in order to receive compensation under the RE Growth Program. A project's proposed construction schedule must allow it to meet the applicable deadline after it has received a Certificate of Eligibility.

If a project does not become operational on or before the twenty-four (24) month deadline, the project's Certificate of Eligibility will be voided.

2.5 Ownership of Products for Small-Scale Solar

Residential

The Company shall have the rights to and receive title to:

(1) Renewable Energy Certificates (RECs) generated by the project during the applicable term of the supplements to the Tariff supplement; and

(2) Rights to any other environmental attributes or electricity market services or products that are created or produced by the project.

For Residential Small-Scale Solar Projects, the customer shall retain title to all energy and capacity produced by the project. All energy and capacity are deemed to have been used by the customer on-site during the term of the applicable supplements to the Tariff. The Company is not buying or taking title to energy or capacity under the RE Growth Program.

Non-Residential

The Company shall have the rights to and receive title to:

(1) RECs generated by the project during the applicable term of the supplements to the Tariff supplement;

(2) All energy produced by the project; and

(3) Rights to any other environmental attributes or electricity market products or services that are created or produced by the project; provided, however, that it shall be the Company's choice to acquire the capacity of the DG Project.

2.5.1 Delivery of RECs and Registration in NEPOOL GIS

The Applicant must take all steps to both enable the Company to obtain the appropriate asset identification for the creation of RECs and the assignment of RECs to the Company through the New England Power Pool Generator Information System (NEPOOL GIS) in accordance with the Tariffs. RECs must be delivered to Rhode Island Energy in the NEPOOL GIS.

2.5.2 Delivery of Energy into ISO-NE Market (Non-Residential Projects Only)

Energy must be delivered to Rhode Island Energy in the ISO–NE Rhode Island load zone.

2.5.3 Participation in ISO-NE Forward Capacity Market (FCM)

Upon Rhode Island Energy's election to acquire the capacity from a Project, Rhode Island Energy will assume the rights to the capacity, pursuant to the Tariff. Rhode Island Energy reserves the right to be the "Project Sponsor" for the Project, after consultation with the Division and the Board. If and when Rhode Island Energy participates as Project Sponsor on behalf of any Project, the Applicant must support Rhode Island Energy, as required, to qualify the Project as an Existing Capacity Resource in the FCM. Applicants are required to take commercially reasonable actions to maximize performance against any FCM Capacity Supply Obligations.

2.5.4 Qualification of RECs

Small-Scale Solar Projects must qualify as an eligible renewable energy resource pursuant to the Rhode Island Renewable Energy Standard (RES) and the Massachusetts Renewable Portfolio Standard (RPS). The Company will obtain such approvals on behalf of all Small-Scale Solar Projects. Applicants must cooperate with the Company, including but not limited to completing the Renewable Energy Certificate Assignment and Aggregation Certification Form, to obtain approval in order to be qualified under the RES and RPS.

2.6 Shared Solar

Shared Solar enables customers who own or rent properties unsuitable for installing solar, or where a single system is preferred, to participate in the RE Growth Program with Small-Scale Solar Projects and Medium-Scale Solar Projects (>0-25 kW DC and >25-250 kW DC nameplate capacity, respectively).

To be eligible to participate in the Shared Solar program, at the time of enrollment, each account listed as a recipient must be in good standing on applicable electric service, payment plans or agreements, and other obligations to the Company, including but not limited to meeting all obligations under an Interconnection Service Agreement. Shared Solar Projects can only share Bill Credits with Bill Credit Recipients on the same or adjacent parcel of land as the DG Project. Where two properties are separated by a public way, they will not be considered to be adjacent.

The system size for Bill Credit Recipients will be determined by the sum of the three (3)-year average on-site use over the previous three (3) years of all of the indicated Bill Credit Recipients'

accounts at the time of the application. For Bill Credit Recipients that have not established a three (3) year on-site usage history, the maximum annual limit will be estimated initially. The customer may request that the Company reset its three (3)-year annual average use once three (3) years of billing history are available.

Shared Solar Projects will receive the same ceiling price and enroll from the same classes of other projects of the same size and ownership as established by the Board for a given program year.

2.6.1 Shared Solar Additional Application Material and Provisions

At the time of application, Shared Solar Applicants must submit a Customer Payment/Credit Transfer Form that notes what billing accounts will be receiving Bill Credits. The system must be sized to not provide output greater than the total of the aggregate three-year average annual usage of all of the Bill Credit recipients, like other on-site systems. Shared Solar Projects must allocate Bill Credits to at least two (2) and no more than fifty (50) accounts in the same customer class and on the same or adjacent parcels of land. Public entities may allocate such Bill Credits to at least two (2) and up to fifty (50) accounts without regard to location so long as the Shared Solar Project and Bill Credit Recipient points of service, which must all belong to the same municipality or public entity, are within the same municipality.

Shared Solar Applicants will receive PBI payments as a combination of cash payments and Bill Credits (Option 2). The DG Project and Bill Credit Recipients must be in the same customer class (i.e., Residential or Non-Residential). All customer accounts receiving Bill Credits must be in the same customer class (i.e., Residential or Non-Residential) although they may be on different retail delivery service rate classes. The Bill Credit value from the Shared Solar Project shall be determined by the recipients' rate class and not that of the facility owner. The Bill Credit value shall be the distribution, transition, transmission, and Last Resort Service supply rates of the Bill Credit Recipients. Any value of Bill Credits not transferred from the Shared Solar project shall be included in the total Performance Based Incentive. PBI payments and Bill Credits will be calculated as set forth in Section 8 of the Non-Residential Tariff and Section 6 of the Residential Tariff.

III. Contact Information and Other Provisions

3.1 Contact Information

All questions and communications regarding these Rules should be directed via electronic mail to Rhode Island Energy at the following address: cap@rienergy.com, with the subject line “RE Growth Question” and a few words describing the nature of the question.

3.2 Official Website for the Enrollment

The Solicitation and Enrollment Process Rules are posted on the Rhode Island Energy Rhode Island RE Growth Program website: https://gridforce.my.site.com/s/article/Rhode-Island-Renewable-Energy-Growth-Program.

Information about the interconnection process and all submission of Interconnection Applications must be submitted through this site as well.

3.3 Rhode Island State Licensing Requirement

Pursuant to R.I. Gen. Laws § 5-65-1, a registered contractor or firm with a contractor's registration shall perform the work associated with the installation of solar energy systems or equipment (i.e. racking systems, inground mounting or anchoring).

Renewable energy firms or their subcontractor or agent conducting installation work must hold a Rhode Island General Contractors License and provide their license registration number on the approved Solar Permit or building permit for the project as a condition of final approval to enroll.

3.4 Confidentiality

The Board, the OER, and Rhode Island Energy shall enter into an agreement regarding the sharing of information and data related to the RE Growth Program, including application information, details regarding project ownership, and pricing. At the request of the Board, the OER, Rhode Island Energy, or the Division, the Commission shall have the authority to protect from public disclosure individual information for any projects that have not been awarded a Certificate of Eligibility. Information regarding project size, location, owner, and price will be made public for projects awarded a Certificate of Eligibility.

3.5 Facility Inspection by Independent Quality Inspector

All facilities shall be subject to inspection for quality and quantity assurance by the Rhode Island Office of Energy Resources, or its duly contracted agents, at the request of the Rhode Island Office of Energy Resources or its agent. Failure to allow such inspection in reasonable time and with full access to the facility will be considered a potential cause for termination or suspension of PBI payments until cured. The results of each inspection will be shared with the installer and the customer account holder.

3.6 Modification or Cancellation of an Enrollment

Pursuant to Chapter 26.6 of Title 39 of the Rhode Island General Laws, any dispute involving the performance-based incentive payments, terms, conditions, rights, enforcement, and implementation of the Tariffs and these Rules is subject to the exclusive jurisdiction of the Commission. Rhode Island Energy may, at any time up to the issuance of Certificates of Eligibility (Section 2.3 above) and without any liability on the part of Rhode Island Energy, postpone, withdraw and/or cancel an enrollment; alter, extend, or cancel any due date; and/or, alter, amend, withdraw and/or cancel any requirement, term or condition of this enrollment.

Schedule 1

Approved Small-Scale Solar Annual MW Target

Renewable Energy Class	Annual Enrollment Target (Nameplate MW)
Small-Scale Solar I – (15 Year Tariff)	~~9 MW DC~~TBD
Small-Scale Solar II – (20 Year Tariff)	

Note: Schedule 1 will be updated as required for each enrollment period at the below site.

~~2024~~ 2025 Small-Scale Renewable Energy Growth Program Available Cap available at:
~~https://gridforce.my.site.com/RI/s/article/Residential-Renewable-Energy-Growth-program-available-cap~~

https://www.rienergy.com/site/other-parties/business-partners/rfp-and-procurement/re-growth-program/enrollment-calendar

Total enrollment target inclusive of larger classes (not shown in this table) is TBD~~107.5~~ MW DC, subject to various conditions regarding Large Solar II and III.

Schedule 2

Approved Small-Scale Solar Standard PBI Applicable to Current Program Year

Renewable Energy Class (Nameplate kW)	Ceiling Price/Standard PBI (Inclusive of assumed eligible federal incentives) (cents/kWh)	Term of Service (years)
Small-Scale Solar I (>0-15 kW DC)	~~36.45~~TBD	15 Year Tariff
Small-Scale Solar II (>15-25 kW DC)	~~33.15~~TBD	20 Year Tariff

Note: The Standard PBI is equivalent to the Ceiling Price that is recommended by the Board and approved by the Commission.

REDLINED VERSION

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

Rhode Island Renewable Energy Growth Program Solicitation and Enrollment Process Rules for Solar (Greater than 25 kW), Wind, Hydro and Anaerobic Digester Projects

Effective Date: ~~May~~ April 1, 2024~~4~~5

Table of Contents

I. Introduction and Overview

1.1 Purpose of the Solicitation and Enrollment

Rhode Island Energy (the Company) developed the Renewable Energy Growth Program (RE Growth Program) pursuant to Chapter 26.6 of Title 39 of the Rhode Island General Laws to facilitate the development and compensation of distributed generation projects in Rhode Island. These Solicitation and Enrollment Process Rules for Non-Residential Projects (Rules) provide the means by which an applicant (Applicant) can qualify and enroll a project (Project) in the RE Growth Program. The Rules are only part of the RE Growth Program documents and should be read along with the Non-Residential RE Growth Program Tariff (Tariff). As described below, a Project enrolled in the RE Growth Program must supply Rhode Island Energy with energy, capacity, Renewable Energy Certificates (RECs), and other environmental attributes and market products. Any term not defined in the Rules is defined in the Tariff.

These Rules will apply to all Projects that are not Small-Scale Solar Projects, subject to the eligibility provisions below. A Small-Scale Solar Project is a solar project having a nameplate capacity of up to and including twenty-five kilowatts (25 kW) and is subject to the rules for Small-Scale Solar Projects.

These Rules, along with the Tariff, will govern the eligibility and procedures for Projects in the RE Growth Program. Rhode Island Energy will not execute individual Power Purchase Agreement contracts with Applicants.

1.2 Enrollment Framework

Rhode Island Energy is operating the RE Growth Program, as guided by the Distributed Generation Board (Board) in consultation with the Rhode Island Office of Energy Resources (OER). The Program is subject to the approval of the Rhode Island Public Utilities Commission (Commission). Rhode Island Energy may also consult with the Rhode Island Division of Public Utilities and Carriers (Division).

For each program year, there will be a target amount of megawatts to be enrolled for the year (annual MW target), and a target amount of megawatts for each enrollment event (enrollment MW target), both of which will be based on nameplate capacity. The nameplate capacity of a Project is its maximum rated output or gross output of a generator; for solar technology, it is the total rated power output of all the panels measured in direct current (DC). The enrollment MW target will be a specific portion of the annual MW target.

For each program year, the Board will recommend the enrollment MW target and a target amount of megawatts for each class of renewable resource (class MW target), which will be a specific portion of the enrollment MW target. Both of these recommendations from the Board are subject to Commission approval. If there is an over-subscription in one class and an under-subscription in an enrollment MW target, then Rhode Island Energy, the OER, and the Board may mutually agree to allocate megawatts from one class to another class within the RE Growth

Program without Commission approval as long as the re-allocated targets would not exceed the annual MW Target.

The annual MW targets shall be established from the year 2023 through the year 2033. The annual target for each program year shall be up to three hundred megawatts (300 MW); provided that, thirty megawatts (30 MW) shall be reserved for projects less than one megawatt (1 MW). The board may petition the commission for approval of multi-year annual targets and associated-ceiling prices.

A "program year" means a year beginning April 1 and ending March 31. Except for the first program year (2015), Rhode Island Energy is required, in consultation with the Board and the OER, to conduct at least three (3) tariff enrollments for each distributed generation class each program year. The classes and targets for each program year are listed in Schedule 1, which will be updated periodically, and Schedule 2 of this application.

For each program year, the Board will recommend the Ceiling Prices and Standard Performance-Based Incentives (PBI), as applicable, for each renewable energy class, subject to Commission approval. For all projects subject to these Solicitation and Enrollment Process Rules, the Ceiling Price is the bidding price cap, further described in Section 2.1.5.

See Schedule 2 for the approved Ceiling Prices for Program Years 2024 through 2026. When the DG Board proposes new annual allocations and/or Small Solar ceiling prices to the Commission, any party may request that the prices be adjusted through participation in the Commission's regulatory process, but an adjustment will be made only if the evidence shows that the established prices will not result in the statutorily required "reasonable rate of return." The party proposing the adjustment, either up or down, will bear the burden of proof and any proposed changes to ceiling prices are subject to regulatory review and approval.

1.2.1 Applications

Each enrollment will be open for a two (2) week period. During the enrollment period, Rhode Island Energy will accept standard short-form applications. The standard application shall require the Applicant to provide the following information about the project: (1) the project ownership; (2) the location of the proposed project; (3) the nameplate capacity; and (4) the renewable energy class. The application allows Applicants to provide additional information relative to the permitting, financial feasibility, ability to build, and timing for achieving commercial operation of the proposed projects. The Applicant must certify in the application that the project will not violate the prohibition on project segmentation, as set forth in the Tariff.

Applicants will be selected for the RE Growth Program in accordance with the rules below.

1.2.2 Eligibility Requirements

1.2.2.1 Introduction

To be eligible, a Project must meet certain requirements, and Rhode Island Energy will review all applications to determine whether they meet these requirements. Projects that do not meet eligibility requirements will be disqualified from the RE Growth Program.

1.2.2.2 Eligible Applicant

An Applicant must be in good standing on its obligations to Rhode Island Energy. Such obligations include but are not limited to meeting obligations under an Interconnection Service Agreement and being current with amounts due on the electric service account(s) or fulfilling the requirements of an approved payment plan.

1.2.2.3 Eligible Facilities

To be eligible for an enrollment, a Project must: (1) be an eligible renewable energy resource under the RE Growth Program, as determined by the Board and approved by the Commission; (2) have a nameplate capacity equal to or less than five megawatts (5 MW) (except for solar projects as described in § 39-26.6-7 that may exceed five megawatts (5 MW) but shall not be greater than fifteen megawatts (15 MW), unless located on preferred sites, in which case they may be sized up to thirty-nine megawatts (39 MW)); (3) interconnect with the distribution system of The Narragansett Electric Company; and (4) be located in The Narragansett Electric Company ISO-NE load zone.

Nameplate capacity is the maximum rated output or gross output of a generator; for solar technology it is the total rated power output of all panels measured in direct current (DC).

To apply, a distributed generation project must not be: (1) already operating; (2) under construction, except for preparatory site work that is less than twenty-five percent (25%) of the estimated total project cost; or (3) fully financed for construction, except to the extent that financing agreements are conditioned upon the selection of the project in this program. A pre-existing hydroelectric generating facility that is already operating may be eligible for the RE Growth Program if it can demonstrate with reasonable evidence its need for a material investment to restore or maintain reliable and efficient operation and meet all regulatory, environmental or operational requirements, in addition to meeting the other criteria of the RE Growth Program.

1.2.2.3.1 Renewable Energy Classes

For each program year, the Board shall determine the renewable energy classes, which are defined by specific technology, nameplate size, and other requirements as may be applicable as determined by the Board, subject to Commission approval. The Board may make recommendations to the Commission to add, eliminate, or adjust renewable energy classes for

each program year. See Schedule 2 for the approved renewable energy classes for the applicable program year. To be eligible for an enrollment, a distributed generation project must qualify within one of the approved renewable energy classes for the applicable program year as indicated in Schedule 2.

1.2.2.3.2 Shared Solar

Shared Solar enables customers who own or rent properties unsuitable for installing solar, or where a single system is preferred, to participate in the RE Growth Program with Small-Scale Solar Projects and Medium-Scale Solar Projects (1-25 kW DC and >25-250 kW DC nameplate capacity, respectively).

To be eligible to participate in the Shared Solar program, at the time of enrollment, each account listed as a recipient must be in good standing on applicable electric service, payment plans or agreements, and other obligations to the Company, including but not limited to meeting all obligations under an Interconnection Service Agreement. Shared Solar Projects can only share Bill Credits with Bill Credit Recipients on the same or adjacent parcel of land as the DG Project. Where two properties are separated by a public way, they will not be considered to be adjacent.

The system size for Bill Credit Recipients will be determined by the sum of the three (3)-year average on-site use over the previous three (3) years of all of the indicated Bill Credit Recipients' accounts at the time of the application. For Bill Credit Recipients that have not established a three (3) year on-site usage history, the maximum annual limit will be estimated initially. The customer may request that the Company reset its three (3)-year annual average use once three (3) years of billing history are available.

Shared Solar Projects will receive the same ceiling price and enroll from the same classes of other projects of the same size and ownership as established by the Board for a given program year.

1.2.2.3.3 Community Remote Distributed Generation

Community Remote Distributed Generation (CRDG) enables customers who cannot or choose not to install renewable technologies at their service location to participate in the RE Growth Program.

Each CRDG class will have a distinct ceiling price as established by the Board, and each class shall be for resources that are larger than 250 kW (DC for solar, AC for other technologies) nameplate capacity. CRDG projects will compete against other CRDG projects in the same CRDG technology and size classes as set by the Board. Each two-week enrollment period will feature these classes as separate categories in which projects will be able to compete. The Company will select CRDG projects as it selects other projects in competitive classes on the basis of prices bid by project Applicants, and will offer a Conditional Certificate of Eligibility to successful

Applicants under the same rules and processes as other classes. CRDG renewable energy classes, annual enrollment targets, and ceiling prices are listed on Schedules 1 and 2.

1.2.2.3.4 Prohibition on Project Segmentation

Project segmentation occurs when one distributed generation project is split into multiple projects on a single parcel or on contiguous parcels in order to qualify under smaller size project classifications. All Applicants are required to include assessor's maps with their applications so that the Company can review project eligibility ~~in light of~~considering the prohibition on project segmentation. Assessor's maps must show the parcel location of the proposed project as well as the parcel location, size and renewable technology of any other renewable energy pending projects or projects which have received a final COE in the past 24 months and have the same owner and/or developer. The Company may also require additional property information to verify whether the project is eligible for participation in the program. ~~The Company may also require additional property information to verify that the project is eligible for participation in the program.~~

Commented [redacted]: This revision reflects the Company's proposal to require specific information included in the Assessor's map as described in the pre-filed testimony of Kimberly. Gauntner.

Under the RE Growth Program, project segmentation is not allowed. However, a Project developer may designate an additional distributed generation unit or portion of a unit on the same parcel or on a contiguous parcel for net metering or for other means of participating in electricity markets, as long as any such unit or portion of such unit: (1) is not receiving Performance-Based Incentives through the RE Growth Program; (2) is segregated electrically; and (3) is separately metered.

For exceptions to project segmentation, please refer to the applicable Tariff.

1.2.2.3.5 Energy Storage System Guidance

Energy Storage Systems (ESS), such as electro-chemical batteries, that can store and release electrical energy, may be co-located with RE Growth qualifying projects. When located behind-the-meter of a customer and able to charge from the electric power system, ESS must be configured in a manner that they cannot export through the RE Growth production meter. When configured to charge directly from the RE Growth system, ESS must be configured so that any energy used for back-up supply purposes is not measured by the RE Growth production meter. Please see the available "ESS Guidance Diagrams" available on the RE Growth webpage at: https://gridforce.my.site.com/RI/s/article/RI-Interconnection-Documents.

Commented [redacted]: As described in the pre-filed testimony of Mark Garland, the Company will update this URL as part of its compliance filing in this docket.

II. Application Evaluation and Selection Criteria and Process

2.1 Overview of Application Evaluation and Selection Process

Applications will be subject to a consistent, defined review and selection process. Projects submitting competitive bids in an enrollment period will be evaluated against other Projects in

the same renewable energy class. The first stage of review determines whether a Project satisfies specified eligibility and minimum threshold requirements. Rhode Island Energy will conduct any additional evaluation as required, consistent with the requirements set forth above. Projects that meet the eligibility and minimum threshold requirements will be awarded based on bid price, up to the class MW target. Subsequent to this selection, Rhode Island Energy will evaluate Projects based on certain threshold criteria, described below in sections 2.1.1-2.1.3, and then award selected projects Conditional Certificates of Eligibility as described in sections 2.1.4.

2.1.1 Interconnection Progress Prior to Enrollment

A Project must have made sufficient progress in the interconnection process prior to enrollment to ensure that interconnection costs have been estimated and the Project is likely to meet the statutory deadlines above. Project owners must have already submitted an application for interconnection and, if necessary, must have received a completed Impact Study for Renewable DG (ISRDG) from the Company. A copy of the interconnection application and a completed ISRDG, or valid Interconnection Service Agreement, must be enclosed along with an application for enrollment under this program. A valid Interconnection Service Agreement is one that has been signed by both the Applicant and Rhode Island Energy. Projects must interconnect with the distribution system of the Narragansett Electric Company and will be located in the Narragansett Electric Company ISO-NE load zone. All interconnection costs, if any, must be paid by the Applicant of the distributed generation (DG) project in accordance with the payment plan identified within the Interconnection Service Agreement. However, a distributed generation facility owner may appeal to the Commission to reduce any required system upgrade costs to the extent such upgrades can be shown to benefit other customers of Rhode Island Energy and the balance of such costs shall be included in rates by Rhode Island Energy for recovery in the year incurred or the year following incurrence.

For information regarding ISRDG and the standards for the interconnection of generators in Rhode Island, please see: https://gridforce.my.site.com/RI/s/article/RI-Interconnection-Documents.

Commented [redacted]: As described in the pre-filed testimony of Mark Garland, the Company will update this URL as part of its compliance filing in this docket.

2.1.2 Site Control

The Applicant must show actual control of the site where the Project is to be located, or show that it has exercised its right to acquire control of the site. To meet this requirement, the Applicant must represent that it owns or leases (or has an executed, exclusive, unconditional option to own or lease) the site on which the proposed project will be located, and that it has any additional rights required to develop and operate the project at the site.

2.1.3 Siting Considerations and Required Documentation

As per the definition in the Non-Residential RE Growth Program Tariff, no renewable distributed generation project that is located or planned to be located in or on a core forest, shall be

considered an eligible renewable distributed generation project or otherwise be eligible to participate in this program, unless it is on a preferred site. The Applicant must provide a signed letter, or other form of approval, from the Rhode Island Department of Environmental Management (RI DEM), that the renewable distributed generation project is not located or planned to be located in or on a core forest, unless it is on a preferred site, which must also be specified in the documentation from the RI DEM. For facilities developed in core forests on preferred sites, no more than one hundred thousand square feet (100,000 sq. ft.) of core forest shall be removed, including for work required for utility interconnection or development of a brownfield, in which case no more core forest than necessary for interconnection or brownfield development shall be removed. Alternatively, if the RI DEM provides a list of project types that are waived from their review process, the Applicant may provide a self-certification form that confirms the renewable distributed generation project is one of the aforementioned project types.

For Large Solar IV projects, the Applicant must provide a signed letter, or other form of approval, from the RI DEM that a given project is sited on a preferred site. RI DEM may make their preferred site determinations in consultation with other relevant state agencies.

All signed letters, or other forms of approval from RI DEM, should include basic project details, including the project name, developer name, facility address, preferred site type, and RIE interconnection case number, for easy reference and verification during the bid evaluation process.

2.1.4 Incentive-Payment Adders for Renewable Energy Projects that Require Remediation

~~2.1.4~~2.1.5 Application Completeness and Timeliness

Total Project Costs

Applications must include the estimated total project development costs. Applications that do not include the estimated total project development costs will be rejected. Total project development cost is defined as: "The expected all-in project capital cost, which should include all hardware, balance of plant, design, construction, permitting, interconnection, metering, development (including developer fee), interest during construction, financing costs and reserves. The total project costs should not include any tax incentives, grants, or other cash incentives, which may be requested separately. This figure should not include O&M expenses or replacement costs. All other upfront capital costs must be included."

Additional Application Requirements

Applicants must endeavor to complete the entire application and provide all reasonably available information in each section of the application. Applicants will not be allowed to

Commented [redacted]: This subsection header serves as a placeholder for the Brownfield Adder Pilot Plan proposed by the Distributed Generation Board in this proceeding, which is subject to the Public Utilities Commission's review and approval. As noted in the pre-filed testimony of Kimberly Gauntner, if approved, the Company will update this tariff as instructed by the Commission.

modify their applications until after a given Open Enrollment period ends. There are a variety of additional requirements, which include items such as:

- Confirmation that the project is not already operating (with a possible exception for pre-existing hydropower);
- Confirmation that the project is not under construction (except for preparatory site work that is less than 25% of the estimated total project cost);
- Confirmation that the project is not fully financed for construction;
- Detail on the permits required for construction and operation, and;
- Project schedule.

Furthermore, the following documents are also required for application:

- Project Material Financial Investment Documentation (for existing hydro generation projects)
- Project Segmentation and Tax Credit Eligibility Affidavit
- Assessor's maps

Applications must be timely submitted in accordance with the enrollment dates set forth in Schedule 4. Applications received after the deadline will not be accepted.

Either through the Rhode Island Energy application process, or upon request by the Company during each open enrollment period, Applicants must provide information on whether the project intends to qualify for Federal Investment Tax Credits.

Following the submission of applications, Rhode Island Energy may request additional information from Applicants at any time during the process. Applicants that do not respond to requests for information may be disqualified from an enrollment. Shared Solar – Additional Application Materials and Provisions

At the time of application, Shared Solar Applicants must submit a Customer Payment/Credit Transfer Form that notes what billing accounts will be receiving Bill Credits. The system must be sized to not provide output greater than the total of the aggregate three-year average annual usage of all of the Bill Credit recipients, like other on-site systems. Shared Solar Projects must allocate Bill Credits to at least two (2) and no more than fifty (50) accounts in the same customer class and on the same or adjacent parcels of land. Public entities may allocate such Bill Credits to at least two (2) and up to fifty (50) accounts without regard to location so long as the Shared Solar Project and Bill Credit Recipient points of service, which must all belong to the same municipality or public entity, are within the same municipality.

Shared Solar Applicants will receive PBI payments as a combination of cash payments and Bill Credits (Option 2). The DG Project and Bill Credit Recipients must be in the same customer class (i.e., Residential or Nonresidential). All customer accounts receiving Bill Credits must be in the same customer class (i.e., Residential or Nonresidential) although they may be on different retail delivery service rate classes. The Bill Credit value from the Shared Solar Project shall be determined by the recipients' rate class and not that of the facility owner. The Bill Credit value shall be the distribution, transition, transmission, and Last Resort Service supply rates of the Bill Credit Recipients. Any value of Bill Credits not transferred from the Shared Solar project shall be

included in the total Performance Based Incentive. PBI payments and Bill Credits will be calculated as set forth in Section 8.c. of the Tariff.

In no case will the annual allocated credits in kWh exceed the prior three (3) year annual average usage, less any reductions for verified energy efficiency measures installed at the customer premises, of the customer account to which the Bill Credits are transferred.

~~2.1.5~~2.1.6 CRDG – Additional Application Materials and Provisions

CRDG Applicants must receive PBI payments in the form of cash and Bill Credits. No more than fifty percent (50%) of the output by kWh generated by the DG Project may be allocated to a single Bill Credit Recipient. At least 50% of the output must be allocated to multiple Bill Credit Recipients in an amount not to exceed that which is produced annually by a twenty-five kilowatt (25 kW) AC capacity system. Both of these conditions must be met within the operational timelines specified in the Tariff, and must be met prior to being allowed to operate in parallel. CRDG Applicants must submit a Customer Payment/Credit Transfer Form that notes the billing accounts for Bill Credit Recipients and other required information. Bill Credit Recipients may receive retail delivery service on any of the Company's rate schedules. CRDG Applicants must designate at least three (3) eligible Bill Credit Recipients. There is a minimum bill credit amount set for projects participating as CRDG facilities each year. The Minimum Bill Credit Amount will be calculated as 50% of the difference between the ceiling prices of non-CRDG facilities and CRDG facilities of the same technology and class, but in no case will be greater than 1.25¢ per kWh. These are shown in the Non-Residential tariff supplements applicable to each program year.

Full Bill Credit Recipient criteria, the allocation of CRDG kWh generation to Bill Credit Recipients, the application of bill credits to customers on the A-60 rate, and the calculation of Bill Credits and cash payments are as set forth in Section 8.d. of the Tariff.

~~2.1.6~~2.1.7 Competitive Bidding for Distributed Generation Projects

All distributed generation projects subject to these Solicitation and Enrollment Process Rules are subject to a bidding process to determine which Projects are selected for the RE Growth Program. Each Project is required to bid a price per kilowatt-hour for its entire output (net of any station service) for the approved tariff term length, which shall not exceed the applicable ceiling price. Following eligibility and threshold evaluations, the price evaluation of the bids for that applicable Tariff supplement will be applied on a consistent basis such that the same approved term lengths for competing bids are used to determine the winning bids. Selection will be made by ranking the eligible projects from lowest bid price received to highest, but not to exceed the applicable ceiling price. See Schedule 2 for the approved Ceiling Prices for the current program year. Projects will be selected beginning with the lowest bid price and continuing to select projects up to the enrollment MW target for the applicable class. If selected, the price each Project bids into the solicitation will be its PBI paid under the applicable Tariff supplement.

If the Projects that bid the same price exceed the capacity specified for a renewable energy class target, Rhode Island Energy will consult with the Board and the OER in selecting first those projects that appear to be the furthest along in development and that are most likely to be deployed. Those Projects that are likely to achieve commercial operations at the earliest time shall be selected first. The Company may also consult with the Board, the OER, and/or the Division during this further assessment.

Performance Guarantee Deposit
Except for small-scale solar and medium-scale solar projects, Applicants are required to pay a performance guarantee deposit to Rhode Island Energy, which must be made by wire transfer. The performance guarantee deposit is determined, in part, on the quantity of renewable energy certificate estimated to be generated per year under the Program. The deposit is fifteen dollars ($15.00) for each REC estimated to be generated per year by a Small Distributed Generation project and twenty-five dollars ($25.00) for each REC estimated to be generated per year by a Large Distributed Generation project. A performance guarantee deposit is at least five hundred dollars ($500) and not more than seventy-five thousand dollars ($75,000).
Projects that classify as Small Distributed Generation projects, with respect to the Performance Guarantee Deposit amounts, are provided in the below table.

Small Wind	**Small-Scale Solar**	**Medium-Scale Solar**	**Other Technology**
50 kW - 1,500 kW	Up to and including 25 kW	Greater than 25 kW, up to and including 250 kW	TBD by the Board, up to 1 MW.

Projects that classify as Large Distributed Generation projects, with respect to the Performance Guarantee Deposit amounts, are provided in the below table.

Commercial-Scale Solar	**Large-Scale Solar**	**Large Wind**	**Other Technology**
Greater than 250 kW, but less than 1 MW	1 MW, but less than 39 MW	Greater than 1.5 MW, up to and including 5 MW	Greater than small DG, up to and including 5 MW

The deposit must be received and confirmed by Rhode Island Energy within five (5) business days after a project is offered a Conditional Certificate of Eligibility. Applicants should be prepared to make a deposit when submitting applications into any enrollment. If payment of the required performance guarantee deposit is not received by the date required, the Company may withdraw the offer and proceed with the next competitive bid in that enrollment.

The Company will refund the performance guarantee deposit over the course of the first year of the project's operation, paid quarterly if a project is issued a Final Certificate of Eligibility. If a project terminates its Conditional Certificate of Eligibility, or the Company terminates a project's Conditional Certificate of Eligibility, the Company will not return the performance guarantee deposit back to the Applicant.

2.2 Issuance of Conditional Certificates of Eligibility

For small-scale and medium-scale solar projects, Rhode Island Energy shall provide Conditional Certificates of Eligibility to the selected projects without obtaining Commission confirmation or approval, but subject to the review and consent of the OER. Rhode Island Energy will file with the Commission a list of all small-scale solar Projects that are awarded Conditional Certificates of Eligibility. Rhode Island Energy will award Conditional Certificates of Eligibility to eligible small-scale solar projects in accordance with the Solicitation and Enrollment Process Rules for Small-Scale Solar Projects.

For all other distributed generation projects, Rhode Island Energy shall file with the Commission a list of the distributed generation projects selected together with the corresponding pricing information. The Commission shall issue an order listing those projects to which Conditional Certificates of Eligibility are awarded within sixty (60) days of receipt of the list.

The Conditional Certificate of Eligibility will contain applicable DG Facility information, including renewable technology and class, facility size and energy output, term length, price, certificate issuance and certificate effective dates.

2.3 Requirements to Initiate Payment for Output

If awarded a Conditional Certificate of Eligibility, a Project is required to meet specific requirements to maintain its status in the RE Growth Program prior to and during construction, and to initiate the start of the payments for its output. These requirements are set forth below.

Small Wind	**Small-Scale Solar**	**Medium-Scale Solar**	**Other Technology**
50 kW - 1,500 kW	Up to and including 25 kW	Greater than 25 kW, up to and including 250 kW	TBD by the Board, up to 1 MW.

Commercial-Scale Solar	**Large-Scale Solar**	**Large Wind**	**Other Technology**
Greater than 250 kW, but less than 1 MW	1 MW, up to and including 38.99 MW	Greater than 1.5 MW, up to and including 5 MW	Greater than small DG, up to and including 5 MW

2.3.1 Project Schedule and Output Certification

A project must certify that it is capable of producing at least ninety percent (90%) of the output that was proposed in its enrollment application before its deadline. All projects will have a twenty-four (24) month deadline to meet this requirement, but anaerobic digestion projects will have thirty-six (36) months, and small-scale hydro and Large-Scale Solar I, II, III, IV will have forty-eight (48) months). A project's proposed construction schedule must allow it to meet the applicable deadline after it has received a Conditional Certificate of Eligibility.

If a project does not certify that it is capable of generating the output proposed in its enrollment application on or before the applicable deadline, the project's Conditional Certificate of Eligibility will be voided and its performance guarantee deposit will be forfeited. Forfeited performance guarantee deposits shall be credited to all distribution customers through rates and not retained by Rhode Island Energy. Rhode Island Energy will not refund the Performance Guarantee Deposit to any project that does not provide an Output Certification or other requirements within the applicable deadlines, including any extensions available to the Applicant as described in Section 3.f. and 3.g. of the Tariff.

A DG Facility must provide an independent third-party (licensed PE) engineer's "Output Certification" stating:

1. that the DG Facility or project has been completed in all material respects;
    a. including completion of construction of facility and all interconnection facilities necessary for operation;
    b. applicable meters have been installed and tested (commissioned).

2. that the DG Facility or project is capable of producing at least 90% of the maximum hourly output proposed in the project application and specified on the *Conditional Certificate of Eligibility*;
3. the actual DC-rated nameplate capacity of the DG Facility or project as built and specified on the *Conditional Certificate of Eligibility*, and the amount of DC-rated nameplate capacity that is installed as-built that qualifies under the Solar Carport definition, if any*;* and the maximum hourly output in kWh/hour in Alternating Current (AC) of the facility as built and specified on the *Conditional Certificate of Eligibility*.

Once a DG Project has provided the Output Certification to Rhode Island Energy, the Project then has 90 days to meet all other requirements pursuant to Section 8.a. of the Tariff in order to receive payment.

Small-scale and medium-scale solar projects are not required to provide the Output Certification or pay an initial performance guarantee deposit. However, after receiving a Conditional Certificate of Eligibility, a small-scale or medium-scale solar project has twenty-four (24) months to meet all other requirements pursuant to the Tariff in order to receive compensation under the RE Growth Program. Medium-Scale Solar Projects will have the option to extend their 24 month deadline of achieving operation at expected availability and capacity and meeting all other requirements under this Tariff by two additional six (6) month periods, but must pay a deposit of $7.50 multiplied by the estimated RECs to be generated during the DG Project's first year of operation for each six (6) month extension. If a Project does not meet this deadline, the Conditional Certificate of Eligibility will be voided.

2.3.2 Qualification as an Eligible Renewable Energy Resource under the RES

An Applicant to the RE Growth Program must obtain qualification for a Project as a renewable energy resource pursuant to the Rhode Island Renewable Energy Standard (RES). Applicants must complete a Renewable Energy Resources Eligibility Form and obtain Commission approval in order to be qualified under the RES. The form can be found at: https://ripuc.ri.gov/utility-information/electric/rhode-island-renewable-energy-standard-ri-res-program

In addition, the Applicant is required cooperate with the Company to register and qualify RECs in other jurisdictions in order to monetize the value of these market products to offset the cost of the RE Growth Program.

2.4 Ownership of Products

The Company shall have the rights and receive title to:

(1) Renewable Energy Certificates (RECs) generated by the Project during the applicable term of the Tariff supplement;

(2) All energy produced by the Project; and

(3) Rights to any other environmental attributes or electricity market products or services that are created or produced by the Project; provided, however, that it shall be the Company's choice to acquire the capacity of the DG Project.

2.4.1 Delivery of Energy into ISO-NE Market

Energy must be delivered to Rhode Island Energy in the ISO–NE Rhode Island load zone at the delivery node associated with the Project.

2.4.2 Delivery of RECs and Registration in NEPOOL GIS

Applicants must cooperate with and provide information to the Company to enable RECs to be created by the Project at the NEPOOL Generation Information System, and for such RECs to be transferred or assigned to the Company's appropriate NEPOOL GIS account, as governed by the Tariff.

2.4.3 Participation in ISO-NE Forward Capacity Market (FCM)

Upon Rhode Island Energy's election to acquire the capacity from a Project, Rhode Island Energy will assume the rights to the capacity, pursuant to the Tariff. Rhode Island Energy reserves the right to be the "Project Sponsor" for the Project, after consultation with the Division and the Board. If and when Rhode Island Energy participates as Project Sponsor on behalf of any Project, the Applicant must support Rhode Island Energy, as required, to qualify the Project as

an Existing Capacity Resource in the FCM. Applicants are required to take commercially reasonable actions to maximize performance against any FCM Capacity Supply Obligations.

III. Contact Information and Other Provisions

3.1 Official Contact

All questions and communications regarding these Rules should be directed via electronic mail to the Rhode Island Energy Procurement Team at the following address: regnonsmallsolar@pplweb.com, with the subject line "RE Growth Question" and a few words describing the nature of the question.

3.2 Submittal of Enrollment Applications

The Solicitation and Enrollment Process Rules are posted on the Rhode Island Energy Rhode Island Renewable Energy Growth Program website: ngus.force.com/s/article/Rhode-Island-Renewable-Energy-Growth-Program

Commented [REDACTED]: As described in the pre-filed testimony of Mark Garland, the Company will update this URL as part of its compliance filing in this docket.

Applications must be submitted electronically via the website, during the two-week Open Enrollment set forth in Schedule 4. Applications received after the deadline cannot be accepted for that particular open enrollment but can be submitted in a future open enrollment solicitation.

3.3 Rhode Island State Licensing Requirement

Pursuant to R.I. Gen. Laws- § 5-65-1, a registered contractor or firm with a contractor's registration shall perform the work associated with the installation of solar energy systems or equipment (i.e. racking systems, in-ground mounting or anchoring).

Renewable energy firms, or their subcontractor or agent conducting the installation, must hold a Rhode Island General Contractors registration and provide their registration number and Electrician license number as part of the interconnection application for the project as a condition of final approval to enroll.

3.4 Confidentiality

Each application shall contain the full name and business address of the Applicant, and a contact person, and shall be signed by an authorized person.

The Board, the OER, and Rhode Island Energy shall enter into an agreement regarding the sharing of the information and data related to the RE Growth Program, including such information as application information, details regarding project ownership, and pricing. At the request of the Board, the OER, Rhode Island Energy, or the Division, the Commission shall have the authority to protect from public disclosure individual information for any projects that have not been awarded a Certificate of Eligibility. Information regarding project size, location, owner, and price will be made public for projects awarded a Certificate of Eligibility.

3.5 Facility Inspection by Independent Quality Inspector

All facilities shall be subject to inspection for quality and quantity assurance by the Rhode Island Office of Energy Resources, or its duly contracted agents, at the request of the Rhode Island Office of Energy Resources or its agent. Failure to allow such inspection in reasonable time and with full access to the facility will be considered a potential cause for termination or suspension of PBI payments until cured.

3.6 Modification or Cancellation of an Enrollment

Pursuant to Chapter 26.6 of Title 39 of the Rhode Island General Laws, any dispute involving the performance-based incentive payments, terms, conditions, rights, enforcement, and implementation of the Tariffs and these Rules, is subject to the exclusive jurisdiction of the Commission. Rhode Island Energy may, at any time up to the issuance of Certificates of Eligibility (Section 2.2 above) and without any liability on the part of Rhode Island Energy, postpone, withdraw and/or cancel this enrollment; alter, extend or cancel any due date; and/or, alter, amend, withdraw and/or cancel any requirement, term or condition of this enrollment.

Schedule 1

Approved Annual Enrollment Targets for Program Year 2025

Renewable Energy Class	2025 Annual Enrollment Target (Nameplate MW)
Medium-Scale Solar (>25 – 250 kW DC)	~~5 MW DC~~TBD
Commercial-Scale Solar I (>250 to 500 kW DC)	TBD~~7.5 MW DC~~
Commercial-Scale Solar II (>500 to <1,000 kW DC)	TBD~~10.5 MW DC~~
Large-Scale Solar I (1 to <5 MW DC)	TBD~~15 MW DC~~
Large-Scale Solar II (5 to <10 MW DC)	TBD~~0 MW DC~~
Large-Scale Solar III (10 to <15 MW DC)	TBD~~0 MW DC~~
Large-Scale Solar IV (15 to <39 MW DC)	TBD~~0 MW DC~~
CRDG Commercial-Scale Solar I (>250 to 500 kW DC)	TBD~~0.5 MW DC~~
CRDG - Commercial-Scale Solar II (>500 to <1,000 kW DC)	TBD~~1 MW DC~~
CRDG Large-Scale Solar 1 (1 to <5 MW DC)	TBD
Community Remote and Non-Community Remote Wind ~~CRDG Large-Scale Solar 1 (1 to <5 MW DC)~~	TBD~~5 MW DC~~
Anaerobic Digestion (>0 to 5,000 kW) ~~Community Remote and Non-Community Remote Wind~~	TBD~~3 MW~~
Small-Scale Hydropower (>0 to 5,000 kW) ~~Anaerobic Digestion (>0 to 5,000 kW)~~	TBD~~1 MW~~

Note: Schedule 1 will be updated as required for each enrollment period via the Rhode Island Renewable Energy Growth Program website. Total enrollment target inclusive of small-scale solar (not shown in this table) is ~~107.5~~TBD MW DC subject to potential reduction (see Note 2).

~~Note 2: Large-Scale Solar II and III's Program Year 2024 megawatt allocation was removed because of delays in the completion of the Affected System Operator interconnection studies.~~

Schedule 2

Approved Renewable Energy Classes and Ceiling Prices Applicable to Program Years2024-2026

Renewable Energy Class	2024 Ceiling Price (per kWh)	2025 Ceiling Price (per kWh)	2026 Ceiling Price (per kWh)	Term of Service (Years)
Medium-Scale Solar (>25 kW-250 kW DC)	33.15	31.95	31.35	20
Commercial-Scale Solar I (>250-500 kW DC)	29.35	28.55	28.35	20
Commercial-Scale Solar II (>500 to <1,000 kW DC)	24.45	23.75	23.55	20
Large-Scale Solar I (1 to <5 MW DC)	18.65	18.05	17.85	20
Large-Scale Solar II (5 to <10 MW DC)	18.05	17.45	17.25	20
Large-Scale Solar III (10 to <15 MW DC)	18.05	17.45	17.25	20
Large-Scale Solar IV (15 to <39 MW DC)	18.05	17.45	17.25	20
CRDG Commercial-Scale Solar I (>250-500 kW DC)	32.25	31.45	31.25	20
CRDG Commercial-Scale Solar II (>500 to <1,000 kW DC)	27.35	26.65	26.35	20
CRDG Large-Scale Solar I (1 to <5 MW DC)	21.35	20.75	20.52	20
Wind (>0 to 5,000 kW)	20.25	19.85	19.85	20
CRDG Wind (>0 to 5,000 kW)	22.05	21.65	21.75	20
Anaerobic Digestion (>0 to 5,000 kW)	19.05	18.95	19.05	20
Hydroelectric (>0 to 5,000 kW)	34.15	33.35	33.45	20

Schedule 3

Anticipated Timeline

Event	Anticipated Dates
Enrollment Begins	
Due Date for Submission of Applications	
Notice of Selection	
Notice of Non-Selection	
File Results with RI PUC for approval and issuance of Medium-Scale Solar Conditional COEs	
RI PUC Approval (expected)	

Schedule RIE-3

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR RESIDENTIAL CUSTOMERS

1. Introduction

This tariff ("Tariff") describes the terms and conditions under which an Applicant for a solar electricity generating facility ("Residential Small-Scale Solar Project" or "Project") will receive funding pursuant to Chapter 26.6 of Title 39 of the Rhode Island General Laws ("Chapter 26.6"), which refers to the Renewable Energy Growth Program ("RE Growth Program").

This Tariff will apply to an Applicant who has installed a Project with a nameplate capacity of up to and including 25 kilowatts at a Customer's service location, or a Project with a nameplate capacity up to 250 kW that is operating as a Shared Solar Facility. The Project must be reasonably designed and sized to produce electricity at an annual level equal to or less than 1) the aggregate On-Site Use of the Residential Customer and the Bill Credit Recipient(s), if applicable, as measured over the previous three (3) years at the eligible electric service account(s) located on the same parcel of land as the Residential Customer's service location; 2) the aggregate annualized On-Site Use over the period of service to the Residential Customer and Bill Credit Recipient(s) if such service has been provided for less than three years; or 3) a reasonable estimate of the aggregate annual On-Site Use of the Customer and the Bill Credit Recipient(s) if the Project is located at a new service location. The Applicant and the Customer for the Project may be the same person, or different persons, subject to the eligibility standards in the Solicitation and Enrollment Process Rules for Small-Scale Solar Projects ("Rules") and this Tariff.

This Tariff applies to the Applicant for a Project that is awarded a Certificate of Eligibility pursuant to the Rules, and any successor Applicant for the Project. Upon being awarded a Conditional Certificate of Eligibility, a Project has 24 months to meet all requirements to receive compensation pursuant to this Tariff.

The Applicant is required to complete and update, as appropriate, the Application information for the Project, including but not limited to: the Project owner, the Customer, the Bill Credit Recipient, the recipient of Performance-Based Incentive Payments, the total cost of the project, indication of whether the system is a "self-install" by the Customer/Project Owner, proof of completed mandatory training from the Rhode Island Office of Energy Resources if the system is a "self-install", and both the General Contractor registration number and the Electrician license number of the entities constructing the project. Upon application, the appropriate Consumer Disclosure or Self-Installer Disclosure form must also be accurately completed and submitted, for the application to be deemed complete. Also, an Applicant may designate a successor Applicant for the Project. The Applicant may, but need not be, the same person or entity to pursue the interconnection of the Project with the Company's electric distribution system. The Applicant maintains the obligation to ensure that all aspects of the Project comply with the terms of the Rules and this Tariff. Upon notice to the Company, the Applicant may transfer the compensation under this Tariff to another person or entity without the consent of the Company.

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR RESIDENTIAL CUSTOMERS

2. **Definitions**

The following words and terms shall have the following meanings when used in this Tariff:

a. Applicant: the person or entity with legal authority to enroll the Project in the RE Growth Program, and with the obligation to ensure that all aspects of the Project comply with the Rules and Tariff.

b. Application: the RE Growth Program Enrollment short form application submitted by the Applicant.

c. Bill Credit: a monthly billing account credit that allows eligible recipients to offset electric service charges applicable to on-site use subject to the eligibility requirements and provisions of Section 6.

d. Bill Credit Recipient: a customer receiving retail delivery service pursuant to Rate A-16 or Rate A-60, and who is eligible to receive Bill Credits from a Shared Solar Facility or Standard DG Project pursuant to the eligibility rules in Section 6. The Bill Credit Recipient must be in good standing on its electric service accounts with the Company and on any payment plans or other agreements with the Company, including but not limited to an interconnection service agreement. Bill Credit Recipients shall receive Bill Credits from a single DG Project.

e. Board: the Distributed Generation Board established pursuant to R.I. Gen. Laws § 39-26.2-10 and having expanded responsibilities under Chapter 26.6.

f. Commission: the Rhode Island Public Utilities Commission.

g. Company: The Narragansett Electric Company d/b/a Rhode Island Energy.

h. Conditional Certificate of Eligibility: written notice by the Company that a DG Project has been enrolled in the RE Growth Program. Upon an award of a Conditional Certificate of Eligibility, a DG Project has a defined period to construct the facility and meet all requirements to receive compensation pursuant to the applicable Tariff.

i. Core forest has the same definition as provided in R.I. Gen. Law §39-26.6-3. “Core forest” refers to unfragmented forest blocks of single or multiple parcels totaling two hundred fifty (250) acres or greater unbroken by development and at least twenty-five (25) acres from mapped roads, with eligibility questions to be resolved by the director of the department of environmental management. Such determination shall constitute a contested case as defined in § 42–35–1. Notwithstanding any other provisions of this chapter, no renewable

distributed-generation project that is located or planned to be located in or on a core forest, shall be considered an eligible renewable-distributed generation project or otherwise be eligible to participate in this program, unless it is on a preferred site.

j. Customer: an electric customer receiving retail delivery service on either Basic Residential Rate A-16 or Low Income Rate A-60 and who is the customer of record at the location on which a Project is installed.

k. Customer Payment/Credit Transfer Form: a form submitted by the Applicant prior to the commercial operation date of the DG Project, which is updated periodically as necessary, and contains all required information to process monthly Performance-Based Incentive Payments and Bill Credits.

l. Distributed–generation facility: means an electrical-generation facility located in the electric distribution company's load zone with a nameplate capacity no greater than five megawatts (5 MW), except for solar projects as described in § 39–26.6–7 that may exceed five megawatts (5 MW) but shall not be greater than fifteen megawatts (15 MW), unless located on preferred sites, in which case they may be sized up to thirty-nine megawatts (39 MW), using eligible renewable energy resources as defined by § 39–26–5, including biogas created as a result of anaerobic digestion, but, specifically excluding all other listed eligible biomass fuels, and connected to an electrical power system owned, controlled, or operated by the electric distribution company. For facilities developed in core forests on preferred sites, no more than one hundred thousand square feet (100,000 sq. ft.) of core forest shall be removed, including for work required for utility interconnection or development of a brownfield, in which case no more core forest than necessary for interconnection or brownfield
development shall be removed. For purposes of this chapter, a distributed-generation facility must be a new resource that:

(i) Has not begun operation;
(ii) Is not under construction, but excluding preparatory site work that is less than twenty-five percent (25%) of the estimated total project cost; and
(iii) Except for small-scale solar projects, does not have in place investment or lending agreements necessary to finance the construction of the facility prior to the submittal of an application or bid for which the payment of performance based incentives is sought under this chapter except to the extent that such financing agreements are conditioned upon the project owner being awarded performance-based incentives under the provisions of this chapter. For purposes of this definition, preexisting hydro generation shall be exempt from the provisions of subsection (6)(i) regarding operation, if the hydro-generation facility will need a material investment to restore or maintain reliable and efficient operation and meet all regulatory, environmental, or operational requirements. For purposes of this provision, "material investment" shall mean investment necessary to allow the project to qualify as a new, renewable energy resource under § 39–26–2. To

be eligible for this exemption, the hydro-project developer at the time of submitting a bid in the applicable procurement must provide reasonable evidence with its bid application showing the level of investment needed, along with any other facts that support a finding that the investment is material, the determination of which shall be a part of the bid review process set forth in § 39–26.6–16 for the award of bids.

m. Distributed–generation project: means a distinct installation of a distributed-generation facility. An installation will be considered distinct if it does not violate the segmentation prohibition set forth in § 39–26.6–9.

n. Final Certificate of Eligibility: notice by the Company that the DG Project has met all the requirements to receive compensation pursuant to the applicable Tariff supplement.

o. Nameplate Capacity: the total rated power output of all the Project's panels, measured in direct current.

p. On-Site Use: the amount of energy used at a Customer's service location during a billing period that may be delivered by the Company, or supplied by the Project, or both.

q. Performance-Based Incentive: the standard price per kilowatt-hour ("kWh") recommended by the Board and approved by the Commission that is applicable to the output of a Project when the Applicant has been awarded a Final Certificate of Eligibility pursuant to the Solicitation and Enrollment Process Rules.

r. Preferred Site: has the same definition as provided in R.I. Gen. Law §39-26.6-3. "Preferred sites" means a location for a renewable energy system that has had prior development, including, but not limited to, landfills, gravel pits and quarries, highway and major road median strips, brownfields, superfund sites, parking lots or sites that are designated appropriate for carports, and all rooftops including, but not limited to, residential, commercial, industrial and municipal buildings.

s. Program Year: a year beginning April 1 and ending March 31, unless otherwise approved by the Commission.

t. Project: a solar photovoltaic electricity generating facility that meets the eligibility requirements of the Rules and this Tariff, that is located in the Company's service territory, and that is interconnected with the Company's electric distribution system at a residential service location.

u. Renewable Energy Certificate ("REC"): an electronic record produced by the New England Power Pool Generation Information System ("NEPOOL-GIS") that identifies the relevant generation attributes of each megawatt-hour accounted for in the NEPOOL-GIS.

v. Shared Solar Facility: a single Small-Scale Solar Project that must allocate Bill Credits to at least two (2) and no more than fifty (50) accounts pursuant to the rules specified in Section 6. Shared Solar enables customers who own or rent properties unsuitable for installing solar, or where a single system is preferred, to participate in the RE Growth Program with Small-Scale Solar Projects (>0-25 kW DC nameplate capacity). The Shared Solar Facility may be owned by the same entity that is the Applicant, the Customer, or another party.

w. Small-Scale Solar Project: a solar DG Project with a nameplate capacity of up to and including 25 kilowatts (25 kW).

x. SolarWise Program: available only through October 15, 2017, an energy efficiency and solar program, which, pursuant to RI Gen Laws § 39-26.6-19, encouraged the use of residential and non-residential solar photovoltaic equipment by offering extra incentives from the RE Growth Program when customers pursued greater energy efficiency savings through the Energy Efficiency Program Plan, which the Company files pursuant to R.I. Gen. Laws. § 39-1-27.7.

y. Solicitation and Enrollment Process Rules for Small-Scale Solar Projects: the rules that govern the solicitation, enrollment, and award processes for the RE Growth Program applicable to Customers, established pursuant to Chapter 26.6, and approved by the Commission.

z. Standard DG Project: a Project that is not classified as a Shared Solar Facility.

3. Project Segmentation

Rhode Island law prohibits project segmentation in the RE Growth Program. In no case may a project developer be allowed to segment a distributed generation project on the same parcel or contiguous parcels into smaller sized projects in order to fall under a smaller size project classification. Subject to the exceptions below, projects proposed by a developer on the same parcel or contiguous parcels will be presumed to have been segmented, and only one of the projects will be eligible for a Certificate of Eligibility. An Applicant may appeal the Company's decision to the Commission.

Before making its determination, the Company will look for one of the following exceptions to the prohibition on project segmentation:

i. The Projects use different renewable energy resources; or

ii. The Projects use the same renewable energy resource, but they are: (1) electrically segregated; (2) separately metered; and (3) can demonstrate that 24 months have elapsed between the commencement of operation for one Project and the commencement of construction of any additional Project.

iii. Projects on contiguous parcels or a single parcel will not be considered as segmented if they serve different Residential Customers.

If the Company determines that a Project is ineligible to enroll in the RE Growth Program due to project segmentation, such project may be eligible for compensation pursuant to the Net Metering Provision or through other energy market participation. Rhode Island law requires eligible Projects must not already be operating to participate in the RE Growth Program, therefore any Project receiving compensation pursuant to the Net Metering Provision is not eligible for the RE Growth Program. Furthermore, if an Applicant is awarded a Final Certificate of Eligibility from the RE Growth Program for a Project and that Project is receiving Performance-Based Incentive Payments pursuant to this Tariff, the Project will not receive compensation pursuant to the Net Metering Provision for the same Project during the term of service specified in the applicable Tariff supplement.

4. Metering

a. The Company shall install a Company-owned meter on all Projects for the purpose of measuring the output of the Project. The meter for the Project shall be wired in parallel with and be adjacent to the existing service meter, or in another location as approved by the Company pursuant with the Company's specifications and policies on metering.

b. The Company must be provided with adequate access to read the meter(s), and to install, repair, maintain, and replace the meter(s).

c. Energy storage systems (ESS), such as electro-chemical batteries, that can store and release electrical energy, may be co-located with RE Growth qualifying projects. When located behind-the-meter of a customer and able to charge from the electric power system, ESS must be configured in a manner that they cannot export through the RE Growth production meter. When configured to charge directly from the RE Growth system, ESS must be configured so that any energy used for back-up supply purposes is not measured by the RE Growth production meter.

5. Renewable Energy Certificates and Other Environmental Attributes

For the term specified in the applicable Tariff supplement, the Company shall have the rights and title to the RECs and any other environmental attributes, as described below, or market products associated with the generation output of the Project. Pursuant to Chapter 26.6, the Customer shall retain title to all energy and capacity produced by the Project, shall be deemed to have consumed such energy and capacity on-site during the applicable billing period, and no sale of the Project's energy or capacity by the Customer to the Company shall be deemed to have occurred.

Prior to receiving compensation pursuant to Section 6 of this Tariff, an Applicant must cooperate with the Company to obtain Commission certification of a Project as an Eligible Renewable Energy Resource pursuant to the Commission's Rules and Regulations Governing the Implementation of a

Renewable Energy Standard. In addition, the Applicant is required to cooperate with the Company to qualify the DG Project under the renewable portfolio standard or similar law and/or regulation of New York, Massachusetts, and/or one or more New England states and/or any federal renewable energy standard.

RECs must be delivered to the Company's appropriate NEPOOL-GIS account. This will be accomplished through registration of the Project with the NEPOOL-GIS. The Applicant shall provide all necessary information and cooperate with the Company to enable the Company to obtain the appropriate asset identification for reporting generation to the NEPOOL-GIS for the creation of RECs and direct all RECs from the Project to the Company's appropriate NEPOOL-GIS account. The Applicant will provide approvals or assignments, including, but not limited to, completing the REC Assignment and Aggregation Form to facilitate the Project's participation in asset aggregation or other model of asset registration and reporting.

Environmental attributes shall include any and all generation attributes or energy services as established by regional, state, federal, or international law, rule, regulation or competitive market or business method that are attributable, now or in the future, to the output produced by the Project during the term of service specified on the applicable Tariff supplement.

6. Performance-Based Incentive Payment

a. Eligibility

Upon receipt of a Final Certificate of Eligibility, the Applicant is entitled to the Performance-Based Incentive Payment for the term specified in the applicable Tariff supplement, provided that the Applicant has complied with all other requirements of this Tariff and the Rules.

As a condition for receiving monthly payments pursuant to Section 6.c, the Applicant must provide confirmation of the following: (1) the Company's written authority to interconnect to its electric distribution system and the Applicant's payment of all amounts due, as assessed by the Company; (2) Commission certification of the Project as an Eligible Renewable Energy Resource pursuant to the Commission's Rules and Regulations Governing the Implementation of a Renewable Energy Standard and NEPOOL-GIS asset registration; as demonstrated by the Applicant's completion of the Renewable Energy Certificate Assignment and Aggregation Form; (3) a copy of the Project's approved State of Rhode Island Solar Permit or building permit, including the responsible Rhode Island General Contractor's Number and (4) the Bill Credit Recipient(s) associated electric service account is not in arrears and is current on any approved payment plan. Applicants who have applied for and received approval for a SolarWise Bonus Payment by October 1, 2017 must complete the requisite energy efficiency measures prior to receiving payment under this Tariff. If payments to an Applicant are suspended or withheld for any reason, up to 90 days of Performance Based Incentive payments and bill credits will be available to be paid once the suspension is cured; the value of all generation that occurred prior to 90 days of the cure will be forfeited.

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR RESIDENTIAL CUSTOMERS

b. Performance-Based Incentive

The Performance-Based Incentive shall be the Performance-Based Incentive that is recommended by the Board and approved by the Commission and will be a fixed per-kWh price for the term specified in the applicable Tariff supplement, and indicated on the Certificate of Eligibility provided to the Applicant.

If applicable, the Performance-Based Incentive may be adjusted to reflect SolarWise Bonus payments pursuant to Section 6.d.

c. Performance-Based Incentive Payment

The Performance-Based Incentive Payment will be the fixed per-kWh Performance-Based Incentive applied to the measured kWh produced by the Project and it shall be provided to the Applicant and/or to the Bill Credit Recipients in accordance with the rules below.

Applicants will be responsible for designating Bill Credit Recipient billing account(s) and each Bill Credit Recipient's percentage share of the generator output on the Customer Payment/Credit Transfer Form. For Project sizing requirements, all Bill Credit Recipients must be listed at the time of application. Bill Credit Recipients will receive an allocation of generated kWh each month for purposes of determining monthly Bill Credits applicable to each Bill Credit Recipient account. The following rules apply to the administration of Performance-Based Incentive Payments:

1) Bill Credit Recipients

i. Standard DG Projects may designate only the Customer as the sole Bill Credit Recipient.
ii. Shared Solar Facilities must designate at least two (2) but no more than fifty (50) Bill Credit Recipients.
iii. The Bill Credit Recipients of Standard DG Projects must be located on the same parcel of land. Shared Solar Facilities can only share Bill Credits with Bill Credit Recipients on the same or adjacent parcels of land as the Project. Properties that are separated by a public way will not be considered to be adjacent.

2) Allocation of kWh Generation to Bill Credit Recipients:

i. Each Bill Credit Recipient will receive a monthly generated kWh allocation equal to the lesser of the Bill Credit Recipient's designated percentage allocation of the kWh output or the Bill Credit Recipient's on-site load for the applicable billing period. For Bill Credit Recipients of Standard DG Projects, the designated percentage allocation is one hundred (100) percent.
ii. Each Bill Credit Recipient will receive monthly generated kWh allocations so long as the cumulative annual allocation to each account is less than the Bill Credit Recipient's Maximum Annual Limit defined as the Bill Credit Recipient's three (3) year average on-site

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use. For Bill Credit Recipients that have not established a three (3) year on-site usage history, the Maximum Annual Limit will be estimated initially. The Maximum Annual Limit may be requested to be reset once a total of three (3) years of billing history are available.

iii. For Bill Credit Recipients enrolled in the Company's A-60 Residential Rate, the maximum annual allocation limit will be either 70% or 75% of their three (3) year annual average on-site usage depending on whether they are receiving a 30% or 25% Low-Income Discount.

3) Calculation of Bill Credits Applicable to Bill Credit Recipients and Residual Cash Payments:

The Bill Credit Recipient's bill will be based upon the On-Site Use, the retail delivery service charges, and the Last Resort Service or Non-Regulated Power Producer charges in effect during the billing period and which applies to the Bill Credit Recipient's retail delivery service rate class. The Company shall apply a Bill Credit, as calculated below, to offset the Bill Credit Recipient's bill. The Bill Credit will appear as a separate line item on the Bill Credit Recipient's bill.

BC = ALLOC x (DC + TC + TrC +LRS)

Where:

BC = Bill Credit

ALLOC = Bill Credit Recipient's allocated generated kWh as determined per Section 6.c.2).i.

DC = the distribution charge per RIPUC No. 2095, Summary of Retail Delivery Rates, as may be amended from time to time.

TC = the Transmission Charge per RIPUC No. 2095, Summary of Retail Delivery Rates, as may be amended from time to time.

TrC = the Transition Charge per RIPUC No. 2095, Summary of Retail Delivery Rates, as may be amended from time to time.

LRS = the Residential Last Resort Service charge per RIPUC No. 2096, Summary of Last Resort Service Rates, as may be amended from time to time. For any facilities enrolled after April 1, 2020, the Last Resort Service kilowatt-hour charge shall be net of the Renewable Energy Standard charge or credit

The Performance-Based Incentive Payment is calculated based on the full monthly output generation (kWh) multiplied by the standard PBI rate. A portion is applied to the bill as a Bill Credit, and the difference between the PBI and the Bill Credit, if any, will be paid in the form a check (or by other agreed-upon means) to the recipient as identified on the Application. The Bill Credit Recipient(s)

will be responsible for paying any balance due on their individual electric bills in accordance with the Terms and Conditions for Distribution Service.

If the sum of the Bill Credits in a given month exceeds the Performance-Based Incentive Payment, each Bill Credit Recipient shall receive the full amount of the Bill Credit, which will not exceed the total of the per kWh delivery service charges and applicable Last Resort Service charge, excluding the customer charge and any applicable taxes. There will be no additional amounts related to the calculation of the Performance-Based Incentive Payment charged or credited to the Bill Credit Recipient(s) or the recipient identified on the Application.

d. SolarWise Program

Standard DG Project Applicants who have been approved as qualifying for a SolarWise Bonus Tier by October 15, 2017 are eligible to receive SolarWise Bonus Payments. The PBI payments pursuant to Section 6.c of this Tariff will be adjusted to reflect the percentage increase applicable to the SolarWise Bonus Tier indicated on the Applicant's SolarWise Approval and Certificate of Eligibility.

All solar PV systems eligible for SolarWise Bonus Award levels must be sized such that the maximum annual electric (kWh) output is not greater than the 3-year historic annual average electric (kWh) usage of the Customer at that location minus the estimated annual electric energy (kWh) savings from the realized or committed measures on their SolarWise application. Systems can also be sized to produce less than the annual usage limit. The use of Excluded Technologies can adjust these calculations.

Example: If a residential customer used an average of 10,000 kWh per year over the previous three years, and implemented energy savings of 2,000 kWh per year, the resulting SolarWise eligible system would be sized to produce no more than a maximum of 8,000 kWh in the course of a year. The maximum size of the customer's solar PV system (using a capacity factor of 14% for this example) would then decrease from 8.15 kW DC to 6.52 kW DC.

If a customer application included Excluded Technologies Adjustments, the system may be sized to include generation sufficient to power the eligible "Excluded Technologies." For example, if the customer example above also provided evidence of an electric vehicle in possession at the time of application that would consume 2,000 kWh per year, the eligible system size would increase to 8.15 kW, in order to generate 10,000 kWh per year. All of this production would be eligible for the SolarWise Bonus Awards.

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR RESIDENTIAL CUSTOMERS

7. Other Company Tariff Requirements

a. The Company will provide the Customer with retail delivery service under the applicable retail delivery service tariff and the Company's Terms and Conditions for Distribution Service

b. The Applicant is required to comply with the Company's Standards for Connecting Distributed Generation. Any application by applicants for Projects seeking to qualify for the Small-Scale Solar class for interconnection under the Standards for Connecting Distributed Generation that is not complete and accurate will be rejected by the Company, as allowed by the Standards for Connecting Distributed Generation, and the applicant will need to resubmit its application for interconnection and Conditional Certificate of Eligibility under this program as a new application.

c. To be eligible to receive Renewable Net Metering Credits and Excess Renewable Net Metering Credits pursuant to the Company's Net Metering Provision following the termination of the Customer's participation in the RE Growth Program, the Project and the Customer must comply with the applicable provisions of the Company's Net Metering Provision.

d. The Company's recovery of all costs it incurs to implement and administer the RE Growth Program is pursuant to the Renewable Energy Growth Program Cost Recovery Provision.

e. By participating in the Renewable Energy Growth Program and accepting a Certificate of Eligibility, all enrolled facilities shall be made available for inspection for quality and quantity assurance by the Rhode Island Office of Energy Resources, or its duly contracted agents, at the request of Rhode Island Office of Energy Resources or its agent. Failure to allow such inspection with full access to the facility within 90 days from the date of the Office of Energy Resources' request for inspection will result in suspension of PBI payments until cured and may result in termination of the Certificate of Eligibility after 180 days from the date of the Office of Energy Resources' request for inspection.

8. Dispute Resolution

If any dispute arises between the Company and either the Applicant or the Customer, the dispute shall be brought before the Commission for resolution. Such disputes may include but are not limited to those concerning the Rules, terms, conditions, rights, responsibilities, the termination of the Tariff or Tariff supplement, or the performance of the Applicant, the Customer, or the Company.

9. Termination

The Applicant and the Customer shall comply with the provisions of this Tariff through the end of the term specified in the applicable Tariff supplement. The Applicant and the Customer may not

terminate their obligations under this Tariff unless and until the Company consents to such termination. A formal request for termination must be submitted to the Company. Termination will be granted if the Applicant cannot fulfill the obligations because of an event or circumstance that is beyond the Applicant's reasonable control and for which the Applicant could not prevent or provide against by using commercially reasonable efforts. If these two conditions are met, ~~T~~the Company will not unreasonably delay or withhold its consent to an Applicant's request to terminate if the Applicant cannot fulfill the obligations because of an event or circumstance that is beyond the Applicant's reasonable control and for which the Applicant could not prevent or provide against by using commercially reasonable efforts.

Commented [redacted]: This revision reflects the Company's proposal described in the pre-filed testimony of Mr. Garland.

Only the Project described on the Certificate of Eligibility is eligible to participate under this Tariff. In no event shall an Applicant expand a Project's nameplate capacity beyond what is allowed by the Certificate of Eligibility. If a Project exceeds the nameplate capacity allowed by the Certificate of Eligibility, the Company may revoke the Certificate of Eligibility.

The Customer and Applicant are required to comply with this Tariff. If the Company determines that a Customer or Applicant has violated the terms and conditions of this Tariff, or the provisions of any other applicable Company tariffs or applicable rules, regulations, or laws, the Company may revoke the Customer or Applicant's Certificate of Eligibility.

If the Customer is installing an additional facility under this tariff or the Net Metering Provision, the Company may allow the initial DG Project enrolled under this tariff to be transferred to enrollment under the Non-Residential Tariff for any term remaining under the initial tariff on a new non-residential customer account, or enroll the new facility under the Non-Residential Tariff. The limitations on DG Project sizing under Section 1 will apply to the combined systems, and all other considerations of this tariff or the Non-Residential Tariff would still apply respectively.

10. Statutory Authority

This Tariff is filed in compliance with R.I. Gen. Laws § 39-26.6-10. The Company will file Tariff supplements and all revisions to this Tariff annually by November 15. This Tariff and its supplements are subject to review, approval, and the exclusive jurisdiction of the Commission.

REDLINED VERSION

First Tariff supplement to RIPUC No. 2151-I
Sheet 1

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

Program Year: April 1, 2015 through March 31, 2016

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, Host Owned	1 to 10 kW	41.35¢	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	37.75¢	20 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	32.95¢	20 years
Small-Scale Solar II	11 to 25 kW	29.80¢	20 years

Issued: February 9, 2015 Effective: April 1, 2015

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

Program Year: April 1, 2016 through March 31, 2017

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)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase (1)	Term of Service
Small-Scale Solar I, Host Owned	1 to 10 kW	37.65¢	39.53¢	41.42¢	n/a	n/a	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	33.45¢	35.12¢	36.80¢	n/a	n/a	20 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	28.35¢	n/a	n/a	28.92¢	29.48¢	15 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	24.70¢	n/a	n/a	25.19¢	25.69¢	20 years

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

Program Year: April 1, 2016 through March 31, 2017

Renewable Energy Class	System Size	Ceiling Price/Standard Performance-Based Incentive (per kWh)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase	Term of Service
Small-Scale Solar II	11 to 25 kW	24.90¢	26.15¢	27.39¢	n/a	n/a	20 years
Small-Scale Solar II, Third-Party Owned	11 to 25 kW	24.90¢	n/a	n/a	25.40¢	25.90¢	20 years

(1) SolarWise Bonus available only to DG Projects that have applied for and received approval for a SolarWise Bonus Tier prior to October 15, 2017.

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

Program Year: April 1, 2017 through March 31, 2018

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)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase (1)	Term of Service
Small-Scale Solar I, Host Owned	1 to 10 kW	34.75¢	36.49¢	38.23¢	n/a	n/a	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	30.85¢	32.39¢	33.94¢	n/a	n/a	20 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	27.05¢	n/a	n/a	27.59¢	28.13¢	15 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	24.05¢	n/a	n/a	24.53¢	25.01¢	20 years

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

Program Year: April 1, 2017 through March 31, 2018

Renewable Energy Class	System Size	Ceiling Price/Standard Performance-Based Incentive (per kWh)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase (1)	Term of Service
Small-Scale Solar II	11 to 25 kW	27.75¢	29.14¢	30.53¢	n/a	n/a	20 years
Small-Scale Solar II, Third-Party Owned	11 to 25 kW	27.75¢	n/a	n/a	28.31¢	28.86¢	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 be inclusive of all eligible federal incentives.

(1) SolarWise Bonus available only to DG Projects that have applied for and received approval for a SolarWise Bonus Tier prior to October 15, 2017.

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

Program Year: April 1, 2018 through March 31, 2019

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, Host Owned	1 to 10 kW	32.25¢	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	28.55¢	20 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	32.25¢	15 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	28.55¢	20 years
Small-Scale Solar II	11 to 25 kW	29.45¢	20 years
Small-Scale Solar II, Third-Party Owned	11 to 25 kW	29.45¢	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.

REDLINED VERSION

Fifth Tariff Supplement to RIPUC No. 2151-I
Sheet 1

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

Program Year: April 1, 2019 through March 31, 2020

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	1 to 10 kW	28.45¢	15 years
Small-Scale Solar I	1 to 10 kW	24.95¢	20 years
Small-Scale Solar II	11 to 25 kW	27.65¢	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.

REDLINED VERSION

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

Program Year: April 1, 2020 through March 31, 2021

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	1 to 10 kW	29.65¢	15 years
Small-Scale Solar II	11 to 25 kW	23.45¢	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.

REDLINED VERSION

Seventh Tariff Supplement to RIPUC No. 2151-I
Sheet 1

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

Program Year: April 1, 2021~~1~~ through March 31, 2022~~2~~

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	1 to 15 kW DC	28.75¢	15 years
Small-Scale Solar II	16 to 25 kW DC	24.35¢	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.

REDLINED VERSION

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

Program Year: April 1, 2022 through March 31, 2023

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	1 to 15 kW DC	31.05¢	15 years
Small-Scale Solar II	16 to 25 kW DC	27.55¢	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.

REDLINED VERSION

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.

REDLINED VERSION

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

Program Year: April 1, 2024 through March 31, 2025

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	2024 Ceiling Price/Standard Performance-Based Incentive (per kWh)	Term of Service
Small-Scale Solar I	>0 to 15 kW DC	36.45	15 years
Small-Scale Solar II	>15 to 25 kW DC	33.15	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.

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

Program Year: April 1, 2025 through March 31, 2026

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	2024 Ceiling Price/Standard Performance-Based Incentive (per kWh)	Term of Service
Small-Scale Solar I	>0 to 15 kW DC	TBD	15 years
Small-Scale Solar II	>15 to 25 kW DC	TBD	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.

Schedule RIE-4

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR NON-RESIDENTIAL CUSTOMERS

1. **Introduction**

This tariff ("Tariff") describes the terms and conditions under which an Applicant for an eligible distributed generation project ("DG Project") will receive funding pursuant to Chapter 26.6 of Title 39 of the Rhode Island General Laws ("Chapter 26.6"), which refers to the Renewable Energy Growth Program ("RE Growth Program").

This Tariff will apply to an Applicant who has installed a DG Project at a Non-Residential Customer's service location or another location that allows for interconnection to the Company's electric distribution system. For this purpose, a Non-Residential Customer ("Customer") is defined as a customer receiving retail delivery service on any rate schedule other than the Company's residential rate schedules (Basic Residential Rate A-16 and Low-Income Rate A-60). This Tariff will also apply to a DG Project that does not provide On-Site Use to a Customer receiving retail delivery service from the Company. The Applicant and the Customer may be the same person, or different persons, subject to the eligibility standards in the Solicitation and Enrollment Process Rules ("Rules") and this Tariff.

This Tariff applies to the Applicant for a DG Project that is awarded a Conditional or Final Certificate of Eligibility by the Commission or the Company pursuant to the Rules, and any successor Applicant for the Project. Upon being awarded a Conditional Certificate of Eligibility, a DG Project has a defined period to meet all requirements to receive compensation pursuant to this Tariff, which is: (1) 48 months for a Small DG Project using hydropower and for Large-Scale Solar I, II, III, IV; (2) 36 months for a Project using anaerobic digestion; or (3) 24 months for a Project using another eligible technology.

Commented [redacted]: This change reflects the Company's non-substantive revision described in the pre-filed testimony of Ms. Gauntner.

The Applicant is required to update the Application information for the DG Project, including but not limited to information concerning: the DG Project owner, the Customer, the Bill Credit Recipient(s), the recipient of Performance-Based Incentive Payments, the total cost of the project, indication of whether the system is a "self-install" by the Customer/Project Owner, proof of completed mandatory training from the Rhode Island Office of Energy Resources if the system is a "self-install", and both the General Contractor registration number and the Electrician license number of the entities constructing the project. Also, an Applicant may designate a successor Applicant for a DG Project under this Tariff with notice to the Company and without the consent of the Company. The Applicant may, but need not be, the same person or entity to pursue the interconnection of the DG Project with the Company's electric distribution system. The Applicant maintains the obligation to ensure that all aspects of a DG Project comply with the terms of the Company's Solicitation and Enrollment Process Rules and this Tariff. Upon notice to the Company, the Applicant may transfer the compensation under this Tariff to another person or entity without the consent of the Company.

2. **Definitions**

The following words and terms shall have the following meanings when used in this Tariff:

a. Applicant: the person or entity with legal authority to enroll the DG Project in the RE Growth program, and with the obligation to ensure that all aspects of the DG Project comply with the Rules.

b. Application: the RE Growth Program Enrollment short form application submitted by the Applicant.

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR NON-RESIDENTIAL CUSTOMERS

c. Bill Credit: means a monthly billing account credit that allows eligible recipients to offset electric service charges applicable to On-Site Use subject to the eligibility requirements and provisions of Section 8.

d. Bill Credit Recipient: a Customer, as defined below, who is eligible to receive Bill Credits from a Community Remote Distributed Generation System, a Shared Solar Facility, or Standard DG Project pursuant to the eligibility rules in Section 8., or a person or entity that is a customer of record and receiving Residential retail delivery service pursuant to one of the Company's residential retail delivery service rate schedules, who is eligible to receive credits from a Community Remote Distributed Generation System or a Shared Solar Facility. The Bill Credit Recipient must be in good standing on its electric service accounts with the Company and on any applicable electric service, payment plans or agreements, including but not limited to meeting all obligations under an interconnection service agreement. Bill Credit Recipients shall receive Bill Credits from a single DG Project.

e. Board: the Distributed Generation Board established pursuant to R.I. Gen. Laws § 39-26.2-10 and having expanded responsibilities under Chapter 26.6.

f. Ceiling price: means the bidding price cap(s) applicable to each annual enrollment for a given distributed-generation class, that shall be approved annually for each renewable energy class pursuant to the procedure established in R.I. Gen. Laws § 39-26.6.. The ceiling price(s) are not required to, but may be, approved for up to three years. The ceiling price for each technology should be a price that would allow a private owner to invest in a given project at a reasonable rate return, based on recently reported and forecast information on the cost of capital and the cost of generation equipment. The calculation of the reasonable rate of return for a project shall include, where applicable, any state or federal incentives, including, but not limited to, tax incentives. Nothing shall prohibit the distributed-generation board from proposing revised ceiling prices prior to a program year to account for changes to available federal or state tax incentives, trade tariffs, or other federal or state incentives which that would affect the calculation of the rate of return on a project.

g. Commercial--Scale Solar Project: a solar DG Project with a nameplate capacity greater than 250 kilowatts (250 kW) but less than 1 megawatt (1 MW).

h. Commission: the Rhode Island Public Utilities Commission.

i. Community Remote Distributed Generation System: a distributed generation facility with a nameplate capacity greater than two hundred fifty kilowatts (250 kW) and which allocates Bill Credits for each kilowatt-hour (kWh) generated to a minimum of three (3) eligible recipient customer accounts pursuant to the rules specified in Section 8. The Community Remote Distributed Generation System may be owned by the same entity that is the Applicant, the Customer, or another party.

j. Company: The Narragansett Electric Company d/b/a Rhode Island Energy.

THE NARRAGANSETT ELECTRIC COMPANY
RENEWABLE ENERGY GROWTH PROGRAM FOR NON-RESIDENTIAL CUSTOMERS

k. Conditional Certificate of Eligibility: written notice by the Company or Commission that a DG Project has been enrolled in the RE Growth Program. Upon an award of a Conditional Certificate of Eligibility, a DG Project has a defined period to construct the facility and meet all requirements to receive compensation pursuant to the applicable Tariff.

l. Core forest has the same definition as provided in R.I. Gen. Law §39-26.6-3. "Core forest" refers to unfragmented forest blocks of single or multiple parcels totaling two hundred fifty (250) acres or greater unbroken by development and at least twenty-five (25) acres from mapped roads, with eligibility questions to be resolved by the director of the department of environmental management. Such determination shall constitute a contested case as defined in § 42–35–1. Notwithstanding any other provisions of this chapter, no renewable distributed-generation project that is located or planned to be located in or on a core forest, shall be considered an eligible renewable-distributed generation project or otherwise be eligible to participate in this program, unless it is on a preferred site.

m. Customer: a person or entity that is receiving retail delivery service pursuant to one of the Company's non-residential retail delivery service rate schedules for a single location having an electric service billing account, and the person or entity is listed as the customer-of-record on the billing account associated with the service location. If the person or entity has more than one account as the Customer-of-record, each account service location will be considered as a separate Customer. The Customer may be the Applicant, a Bill Credit Recipient or a third party.

n. Customer Payment/Credit Transfer Form: means a form submitted by the Applicant prior to the commercial operation date of the DG Project, and updated periodically as necessary, containing all required information necessary to process monthly Performance-Based Incentive Payments and Bill Credits.

o. Distributed–generation facility: means an electrical-generation facility located in the electric distribution company's load zone with a nameplate capacity no greater than five megawatts (5 MW), except for solar projects as described in § 39–26.6–7 that may exceed five megawatts (5 MW) but shall not be greater than fifteen megawatts (15 MW), unless located on preferred sites, in which case they may be sized up to thirty-nine megawatts (39 MW), using eligible renewable energy resources as defined by § 39–26–5, including biogas created as a result of anaerobic digestion, but, specifically excluding all other listed eligible biomass fuels, and connected to an electrical power system owned, controlled, or operated by the electric distribution company. For facilities developed in core forests on preferred sites, no more than one hundred thousand square feet (100,000 sq. ft.) of core forest shall be removed, including for work required for utility interconnection or development of a brownfield, in which case no more core forest than necessary for interconnection or brownfield development shall be removed. For purposes of this chapter, a distributed-generation facility must be a new resource that:

(i) Has not begun operation;
(ii) Is not under construction, but excluding preparatory site work that is less than twenty-five percent (25%) of the estimated total project cost; and
(iii) Except for small-scale solar projects, does not have in place investment or lending agreements necessary to finance the construction of the facility prior to the submittal of

an application or bid for which the payment of performance based incentives is sought under this chapter except to the extent that such financing agreements are conditioned upon the project owner being awarded performance-based incentives under the provisions of this chapter. For purposes of this definition, preexisting hydro generation shall be exempt from the provisions of subsection (6)(i) regarding operation, if the hydro-generation facility will need a material investment to restore or maintain reliable and efficient operation and meet all regulatory, environmental, or operational requirements. For purposes of this provision, "material investment" shall mean investment necessary to allow the project to qualify as a new, renewable energy resource under § 39–26–2. To be eligible for this exemption, the hydro-project developer at the time of submitting a bid in the applicable procurement must provide reasonable evidence with its bid application showing the level of investment needed, along with any other facts that support a finding that the investment is material, the determination of which shall be a part of the bid review process set forth in § 39–26.6–16 for the award of bids.

p. Distributed–generation project: means a distinct installation of a distributed-generation facility. An installation will be considered distinct if it does not violate the segmentation prohibition set forth in § 39–26.6–9.

q. Final Certificate of Eligibility: notice by the Company that the DG Project has met all the requirements to receive compensation pursuant to the applicable Tariff supplement.

r. ISO-New England, Inc. ("ISO-NE"): the Independent System Operators of New England, Inc., established in accordance with the NEPOOL Agreement and applicable Federal Energy Regulatory Commission approvals, which is responsible for managing the bulk power generation and transmission systems in New England.

s. Large DG Project: a DG Project with a nameplate capacity that exceeds the size of a Small DG Project in a given year but is no greater than five megawatts (5 MW) nameplate capacity, except for solar projects, which shall be no greater than thirty-nine megawatts (39 MW) nameplate capacity.

t. Large-Scale Solar I Project: a solar DG Project with a nameplate capacity of one megawatt (1 MW) or greater, but less than five megawatts (5 MW).

u. Large-Scale Solar II Project: a solar DG Project with a nameplate capacity of five megawatts (5 MW) or greater, but less than ten megawatts (10 MW).

v. Large-Scale Solar III Project: a solar DG Project with a nameplate capacity of ten megawatts (10 MW) or greater, but less than fifteen megawatts (15 MW).

w. Large-Scale Solar IV Project: a solar DG Project with a nameplate capacity of fifteen megawatts (15 MW) or greater, but less than thirty-nine megawatts (39 MW), for projects located on preferred sites.

x. Low-Income Discount: the discount provided to a customer receiving delivery service on the Low-Income Rate A-60 pursuant to the terms of the Low-Income Rate A-60 tariff.

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y. Medium-Scale Solar Project: a solar DG Project with a nameplate capacity greater than 25 kilowatts (25 kW) and up to and including 250 kilowatts (250 kW).

z. Nameplate Capacity: the maximum rated output or gross output of a DG Project. For a solar DG Project, it is the total rated power output of all the DG Project's panels, measured in direct current (DC).

aa. Office: the Rhode Island Office of Energy Resources.

bb. On-Site Use: the amount of energy used at a Customer or Bill Credit Recipient service location during a billing period that may be delivered by the Company, or supplied by the DG Project, or both.

cc. Output Certification: certification provided by an independent engineer (licensed Professional Engineer) stating that construction of both the DG Project and the interconnection facilities is complete in all material respects, that the metering has been installed and tested, that the Nameplate Capacity is as on the Conditional Certificate of Eligibility, and that the DG Project is capable of producing at least 90% of the maximum hourly output specified on the Conditional Certificate of Eligibility.

dd. Performance-Based Incentive: either a standard price per kilowatt-hour ("kWh") for small-scale solar, or a competitively bid price per kWh for all other renewable energy classes, that is applicable to the output of a DG Project when the Applicant has been awarded a Final Certificate of Eligibility, pursuant to the Rules.

ee. Preferred Site: has the same definition as provided in R.I. Gen. Law §39-26.6-3. "Preferred sites" means a location for a renewable energy system that has had prior development, including, but not limited to, landfills, gravel pits and quarries, highway and major road median strips, brownfields, superfund sites, parking lots or sites that are designated appropriate for carports, and all rooftops including, but not limited to, residential, commercial, industrial and municipal buildings.

ff. Program Year: a year beginning April 1 and ending March 31, unless otherwise approved by the Commission.

gg. - "Renewable energy classes" means categories for different renewable energy technologies using eligible renewable energy resources as defined by § 39–26–5, including biogas created as a result of anaerobic digestion, but, specifically excluding all other listed eligible biomass fuels specified in § 39–26–2(6). For each program year, in addition to the classes of solar distributed generation specified in § 39–26.6–7, the board shall determine the renewable energy classes as are reasonably feasible for use in meeting distributed-generation objectives from renewable energy resources and are consistent with the goal of meeting the annual target for the program year. The board may make recommendations to the commission to add, eliminate, or adjust renewable energy classes for each program year, provided that the solar classifications set forth in § 39– 26.6–7 shall remain in effect

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for at least the first two (2) program years and no distributed-generation project may exceed five megawatts (5 MW) of nameplate capacity except for solar projects as described in § 39–26.6–7.

hh. Renewable Energy Certificate ("REC"): an electronic record produced by the New England Power Pool Generation Information System ("NEPOOL-GIS") that identifies the relevant generation attributes of each megawatt-hour accounted for in the NEPOOL-GIS.

ii. Shared Solar Facility: a single Small-Scale or Medium-Scale Solar Project that must allocate Bill Credits to at least two (2) and no more than fifty (50) accounts pursuant to the rules specified in Section 8. Shared Solar enables customers who own or rent properties unsuitable for installing solar, or where a single system is preferred, to participate in the RE Growth Program with Small-Scale Solar Projects and Medium-Scale Solar Projects (>0-25 kW DC and >25-250 kW DC nameplate capacity, respectively). The Shared Solar Facility ~~-~~may be owned by the same entity that is the Applicant, the Customer, or another party.

jj. Small-Scale Solar Project: a solar DG Project with a nameplate capacity of up to and including 25 kilowatts (25 kW).

kk. Small DG Project: either: (1) a Small-Scale Solar Project; (2) a Medium-Scale Solar Project; (3) a wind DG Project with a nameplate capacity of at least fifty kilowatts (50 kW) up to one and one-half megawatts (1.5 MW); or (4) a DG Project using renewable energy resources other than solar and wind, with a nameplate capacity to be determined by the Board, but no greater than one megawatt (1 MW).

ll. Solar Carport: The portion of the direct current (DC) nameplate capacity of a Solar DG Project that is installed above a permeable and/or non-permeable existing or new parking area and associated access and walkway areas (as recognized by the local municipal building and/or zoning department), which is installed in a manner that maintains the function of the area beneath the structure, and is continued to be used or available for use for such purposes for the term of enrollment in this tariff.

mm. SolarWise Program: available only through October 15, 2017, an energy efficiency and solar program, which, pursuant to RI Gen Laws § 39-26.6-19, encouraged the use of residential and non-residential solar photovoltaic equipment by offering extra incentives from the RE Growth Program when customers pursued greater energy efficiency savings through the Energy Efficiency Program Plan, which the Company files pursuant to R.I. Gen. Laws. § 39-1-27.7.

nn. Solicitation and Enrollment Process Rules: the rules governing the solicitation, enrollment, and award processes for the RE Growth Program for Non-Residential Customers, established pursuant to Chapter 26.6, and approved by the Commission.

oo. Standard DG Project: a project that is not classified as either a Shared Solar Facility or a Community Remote Distributed Generation System.

pp. Station Service: energy used to operate auxiliary equipment and other load that is directly related to the production of energy by a DG Project.

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3. **Performance Guarantee Deposit**

a. No later than five (5) business days after a project is offered a Conditional Certificate of Eligibility, the Applicant shall submit by wire transfer a Performance Guarantee Deposit ("Deposit") as identified on the Conditional Certificate of Eligibility. Each Deposit shall be no less than $500.00 and no greater than $75,000.00. The Deposit shall be calculated as $15.00 for Small DG Projects or $25.00 for Large DG Projects, multiplied by the estimated RECs to be generated during the DG Project's first year of operation. Small-Scale Solar Projects and Medium-Scale Solar Projects are not required to submit a Performance Guarantee Deposit to receive a Conditional Certificate of Eligibility.

b. If the Company does not receive a Deposit per Section 3.a., the Company may withdraw the Conditional Certificate of Eligibility offer and not proceed further with the Applicant in that enrollment.

c. The Deposit shall be refunded to the Applicant during the first year of the DG Project's operation, paid quarterly. In the event that the Applicant terminates the DG Project prior to operation, the Deposit will be forfeited.

d. Except for Small-Scale Solar Projects and Medium-Scale Solar Projects, after receiving the Conditional Certificate of Eligibility, the Applicant must provide the Output Certification within: (1) 48 months for Small DG Projects using hydropower or Large-Scale Solar Projects; (2) 36 months for anaerobic digestion; or (3) 24 months for all other DG Projects. If the Output Certification is not received within the specified timeframe (including extensions allowable by the applicable Tariff or Rules), the Conditional Certificate of Eligibility will be voided and the Deposit will be forfeited. Once a DG Project has provided the Output Certification to Rhode Island Energy, the project then has 90 days to meet all other requirements specified in Section 8(a) to receive payment pursuant to the Tariff. For Small-Scale Solar Projects and Medium-Scale Solar Projects, projects have 24 months after being awarded a Conditional Certificate of Eligibility to achieve operation at expected availability and capacity, and meet all other requirements under this Tariff.

e. An Applicant may elect, for any reason, to extend the DG Project deadline for providing the Output Certification by an additional six (6) months with no additional Deposit. After such initial six-month extension, the Applicant may elect, for any reason, to extend Output Certification deadline for an additional six-month period by posting an additional Deposit, with the amount equal to one-half of the original Deposit amount. An Applicant shall not extend the deadline to provide the Output Certification by more than one (1) year in total. Prior to the expiration of the timeframe applicable to the Applicant's DG Project, as specified herein Section 3(d) or as extended as provided for by Section 3(f), the Applicant must notify the Company of its election to extend the DG Project deadline.

f. ~~Medium-Scale Solar Projects will have the option to extend their 24 month deadline of achieving operation at expected availability and capacity and meeting all other requirements under this~~

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~~Tariff by two additional six (6) month periods, but must pay a Deposit of $7.50 multiplied by the estimated RECs to be generated during the DG Project's first year of operation for each six (6) month extension.~~ Medium-Scale Solar Projects have the option to extend their 24-month deadline of achieving operation at expected capacity, as well as all other requirements under this Tariff, by two (2) additional six -month periods. For each six-month extension, a Deposit must be paid. Each deposit, for each extension is equal to $7.50 multiplied by the estimated RECs to be generated during the DG Project's first year of operation.

~~e.~~

~~f.~~g. If the Applicant is unable to provide the Output Certification within the timeframe specified in Section 3(d), or as extended pursuant to Section 3(f), because of non-completion of the necessary system modifications on the Company's side of the meter or any other interconnection delays that are beyond the reasonable control of the Applicant, the deadline for providing the Output Certification will be extended until such time as the DG Project has received approval from the Company to interconnect to the Company's distribution system and begin production, with no additional deposit required.

h. If an act of God occurs within the timeframe allowed for providing the Output Certification, and as a direct result of the act of God, the DG Project is incapable of providing the Output Certification within the timeframe prescribed in this Tariff, the DG Project shall be terminated and the Deposit shall be refunded immediately.

4. **Interconnection**

a. The interconnection of the DG Project with the Company's distribution system and any system modification s required by the Company shall be in accordance with the Standards for Connecting Distributed Generation and coordinated or delegated by the Applicant.

b. Except for Small-Scale Solar Projects and Medium-Scale Solar Projects, all Applicants for DG Projects awarded a Conditional Certificate of Eligibility are required to submit quarterly reports to the Company and the Office reporting on the progress of construction. Failure to submit these reports may result in the loss of the Applicant's Conditional Certificate of Eligibility.

5. **Project Segmentation**

Rhode Island law prohibits project segmentation in the RE Growth Program. In no case may a project developer be allowed to segment a distributed generation project on the same parcel or contiguous parcels into smaller sized projects in order to fall under a smaller size project classification. Subject to the exceptions below, projects proposed by a developer on the same parcel or contiguous parcels will be presumed to have been segmented and only one of the projects will be eligible for a Certificate of Eligibility. An Applicant may appeal the Company's decision to the Commission.

Before making its determination, the Company will look for one of the following exceptions to the prohibition on project segmentation:

Commented [redacted]: This revision reflects the Company's proposed changes concerning medium-scale solar projects guarantee deposits described in the pre-filed testimony of Ms. Gauntner.

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i. The DG Projects use different renewable energy resources; or

ii. The DG Projects use the same renewable energy resource, but they are: (1) electrically segregated; (2) separately metered; and (3) can demonstrate that 24 months have elapsed between the commencement of operation for one DG Project and the commencement of construction of any additional DG Project.

iii. DG Projects installed on the same or contiguous parcels will not be considered segmented if they serve different Non-Residential Customers and both Customers receive bill credits under Option 2 as defined in Section 8.c.

iv. If two or more projects are proposed on same or contiguous parcels and their combined nameplate capacity does not total to an amount that exceeds the class nameplate range of the enrollment class of the individual projects

If the Company determines that a DG Project is ineligible to enroll in the RE Growth Program due to project segmentation, such project may be eligible for compensation pursuant to the Net Metering Provision or through other energy market participation. Rhode Island law requires eligible Projects must not already be operating to participate in the RE Growth Program, therefore any Project receiving compensation pursuant to the Net Metering Provision is not eligible for the RE Growth Program. Furthermore, if an Applicant is awarded a Final Certificate of Eligibility for a DG Project and is receiving Performance-Based Incentive Payments pursuant to this Tariff it will not receive compensation pursuant to the Net Metering Provision for the same DG Project during the term specified in the applicable Tariff supplement.

6. **Metering**

a. A Company-owned meter must be installed on all DG Projects that are enrolled in the RE Growth Program for the purpose of measuring and reporting the output of the DG Project. An interval meter will be installed on all projects greater than 25 kW in AC capacity. In the event that there is an existing service location with an existing meter, the meter for the DG Project shall be wired in parallel with, and be adjacent to, the existing service meter, or in another location as approved by the Company pursuant with the Company's specifications and polices on metering. In the event an existing service meter is present, the existing service meter will be exchanged for an interval meter by the Company at the Applicant's expense.

b. For Medium-Scale Solar Projects, Commercial-Scale Solar Projects, Large-Scale Solar Projects, and DG Projects of other eligible technologies, the Applicant is responsible for the cost of a revenue-quality interval meter and associated metering equipment, including required remote communication for measuring and reporting the output of the DG Project as well as any existing service meter. An Applicant may elect to supply the meter and associated equipment provided that it conforms to the Company's metering standards and the Rhode Island Division of Public Utilities and Carriers ("Division") Rules for Prescribing Standards for Electric Utilities, as may be amended from time to time. At the request of the Applicant, the Company will provide the required interval meter and

associated equipment, subject to the Company having such equipment available and the Applicant reimbursing the Company for its cost.

c. The Company must be provided with adequate access to read the meter(s), and to install, repair, maintain and replace the meter(s), if applicable.

d. Energy storage systems (ESS), such as electro-chemical batteries, that can store and release electrical energy, may be co-located with RE Growth qualifying projects. When located behind-the-meter of a customer and able to charge from the electric power system, ESS must be configured in a manner that they cannot export through the RE Growth production meter. When configured to charge directly from the RE Growth system, ESS must be configured so that any energy used for back-up supply purposes is not measured by the RE Growth production meter.

7. **Energy, Capacity, Renewable Energy Certificates and Other Environmental Attributes**

a. Prior to receiving compensation pursuant to Section 8 of this Tariff, an Applicant, at its own cost, must obtain Commission certification of a DG Project as an Eligible Renewable Energy Resource pursuant to the Commission's Rules and Regulations Governing the Implementation of a Renewable Energy Standard. In addition, the Applicant is required to cooperate with the Company to qualify the DG Project under the renewable portfolio standard or similar law and/or regulation of New York, Massachusetts, and/or one or more New England states and/or any federal renewable energy standard.

b. For the term specified in the applicable Tariff supplement, the Company shall have the irrevocable rights and title to the following products produced by the DG Project: (1) RECs; (2) energy; and (3) any other environmental attributes or market products associated with the sale of energy or energy services produced by the DG Project, provided, however, that it shall be the Company's choice to acquire the capacity of the DG Project at any time after it is awarded a Certificate of Eligibility by the Commission or the Company pursuant to the Rules. Environmental attributes shall include any and all generation attributes or energy services established by regional, state, federal, or international law, rule, regulation or competitive market or business method that are attributable, now or in the future, to the output produced by the DG Project during the term of service specified on the applicable Tariff supplement.

(1) RECs: RECs must be delivered to the Company's appropriate NEPOOL-GIS account. This will be accomplished through registration of the DG Project with the NEPOOL-GIS. If requested by the Company, Applicant will provide approvals or assignments, as necessary, to facilitate the DG Project's participation in asset aggregation or other model of asset registration and reporting.

Small-Scale Solar Projects shall provide all necessary information to, and cooperate with, the Company to enable the Company to obtain the appropriate asset identification for reporting generation to the NEPOOL-GIS for the creation of RECs and direct all RECs from the DG Project to the Company's appropriate NEPOOL-GIS account. The Applicant will provide approvals or assignments, including, but not limited to,

completing the Renewable Energy Certificate Assignment and Aggregation Form, to facilitate the DG Project's participation in asset aggregation or other model of asset registration and reporting.

(2) Energy: Except for Small-Scale Solar Projects, energy must be delivered to the Company in the Company's ISO–NE load zone at the delivery node associated with the DG Project. As requested by the Company or the ISO-NE, Applicant will provide all necessary information as well as follow all requirements for all applicable market rules needed to set up the necessary generation asset.

(3) Capacity: The Company may qualify the DG Project as an Existing Capacity Resource in the Forward Capacity Market ("FCM") after the Commercial Operation Date to participate in the FCM, as determined by the Company, in consultation with the Division. As requested by the Company or the ISO-NE, Applicant will provide all necessary information as well as follow all requirements for all applicable market rules needed to set up the necessary capacity asset Applicants are required to take commercially reasonable actions to maximize performance against any FCM Capacity Supply Obligations.

8. **Performance-Based Incentive Payment**

a. Eligibility

Upon receipt of a Final Certificate of Eligibility, the Applicant is entitled to the Performance-Based Incentive Payment for the term specified in the applicable Tariff supplement, provided that the Applicant has complied with all other requirements of this Tariff and the Solicitation and Enrollment Process Rules.

As a condition for receiving monthly payments pursuant to Section 8, the Applicant must provide confirmation of the following: 1) the Company's written authority to interconnect to its electric distribution system and Applicant's payment of all amounts due; 2) Commission certification of the DG Project as an Eligible Renewable Energy Resource; 3) registration of the DG Project with the ISO-NE and NEPOOL GIS; 4) a copy of the Project's approved State of Rhode Island Solar Permit or building permit, including the responsible Rhode Island General Contractor's Number; and 5) except for small-scale and medium-scale solar, the Output Certification. Small-Scale Solar Projects can demonstrate completion of items 2 and 3 by the completion of the Renewable Energy Certificate Assignment and Aggregation Form. If an Applicant or Customer is no longer in good standing with regard to payment plans or agreements, if applicable, and other obligations to the Company (including but not limited to meeting all obligations under an interconnection service agreement), the Company may withhold payments under this Tariff. In addition, all Bill Credit Recipient(s) must remain in good standing with regard to the electric service account(s) receiving Bill Credits pursuant to this tariff, or the Company may withhold Bill Credits until such an account is again in good standing. If payments to an Applicant are suspended or withheld for any reason, up to 90 days of Performance Based Incentive payments and bill credits (if applicable) will be available to be paid once the suspension is cured; the value of all generation that occurred prior to 90 days of the cure will be forfeited.

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b. Performance-Based Incentive

The Performance-Based Incentive will be a fixed per-kWh price for the term specified in the applicable Tariff supplement.

The Performance-Based Incentive for Small-Scale Solar shall be a standard Performance-Based Incentive that is recommended by the Board and approved by the Commission. The Performance-Based Incentive for other DG Projects shall be determined through competitive bidding.

If applicable, for any Customer who has applied for and received approval for a SolarWise Bonus Tier and has met all of the requirements to receive a SolarWise Bonus by October 15, 2017, the Performance-Based Incentive may be adjusted to reflect SolarWise Bonus payments pursuant to Section 8.e.

Zonal Incentive: In addition to the Performance-Based Incentive, the Company may propose, and the Commission may approve, a zonal incentive, which is in addition to the Performance-Based Incentive for DG Projects that are: 1) located in designated geographic areas; or 2) comply with other specified conditions. Any Zonal Incentive shall be reflected in the applicable Tariff supplement.

Solar Carport Incentive:
The Solar Carport Incentive was available during Program Years 2020 and 2021, up until March 31, 2022. For any project that applied for and received approval of a Certificate of Eligibility that includes the Solar Carport Incentive, the SCI will be added to the competitively bid PBI of the specific project, and the total amount will be paid on all generation of the total DG Project and as indicated on the Customer's Certificate of Eligibility. Any change in the DC nameplate rating of a Solar Carport portion of a project as built must be provided to the Company prior to Authority to Interconnect, and adjustments to the SCI amount will be reflected in the Final Certificate of Eligibility provided to the Customer, based on the SCI formula in effect at the time of application. Additionally, the project owner shall provide final cost data, with documentation to verify costs (invoices, contracts, etc.) for the carport's canopy structure and mounting system at the time of approval of Final Certificate of Eligibility as a condition for receiving payment of the PBI and Carport Adder. No changes to the Solar Carport portion of the project are permitted after the project is operational.

c. Performance Based Incentive Payment for Standard DG Projects and Shared Solar.

The Performance-Based Incentive Payment will be the fixed per-kWh Performance-Based Incentive, plus any adjustments where applicable, applied to the measured kWh produced by the DG Project, net of any Station Service. Distribution of the Performance-Based Incentive Payment will be in accordance with the rules below.

Applicants that have been awarded a Final Certificate of Eligibility for a DG Project will receive Performance-Based Incentive Payments in accordance with the rules specified in this section. Before a DG Project begins to operate, an Applicant must notify the Company of the manner by which it will be compensated for its output under one of the two options below. There are two mechanisms in which an Applicant can receive Performance-Based Incentive Payments, which include either cash (Option 1) or a combination of cash and Bill Credits (Option 2). Standard DG Projects may select Option 2 only if the DG Project can be configured to serve on-site load. Shared Solar Facilities must select Option 2, and will receive Performance-Based Incentive Payments as a

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combination of cash payments and Bill Credits. Applicants will be responsible for designating Bill Credit Recipient billing account(s), and each Bill Credit Recipient's percentage share of the generator output on the Customer Payment/Credit Transfer Form. For DG Project sizing requirements, all Bill Credit Recipients must be listed at the time of application. Bill Credit Recipients will receive an allocation of generated kWh each month for purposes of determining monthly Bill Credits applicable to each Bill Credit Recipient account.

1. Option 1: Direct payment of the entire Performance-Based Incentive Payment in the form of a check or such other payment method that is mutually agreed upon by the Company and the Applicant; or

2. Option 2: A combination of direct payment and Bill Credit Recipient Bill Credits.

The following rules apply to the administration of Performance-Based Incentive Payments under Option 2:

1) Bill Credit Recipients

i. Standard DG Projects are not required to designate a Bill Credit Recipient. However, if Standard DG Projects choose to designate a Bill Credit Recipient, they may designate only the Customer as the sole Bill Credit Recipient.
ii. Shared Solar Facilities must designate at least two (2) but no more than fifty (50) Bill Credit Recipients.
iii. Shared Solar Bill Credit Recipients must be in the same customer class (i.e. Residential or Non-Residential) but may be in different retail delivery service rate classes.
iv. The Bill Credit Recipients of Standard DG Projects must be located on the same parcel of land. Shared Solar Facilities can only share Bill Credits with Bill Credit Recipients on the same or adjacent parcels of land as the DG Project. Properties that are separated by a public way will not be considered to be adjacent. Applicants who operate a Shared Solar Facility on behalf of a Public Entity may designate Bill Credit Recipients without regard to physical location so long as the Shared Solar Facility's and Bill Credit Recipient's points of service, which must all belong to the same municipality or public entity, are located within the same municipality.
v. The Applicant may make changes to the Bill Credit Recipients of a Shared Solar facility once per calendar quarter, and must provide such change in a specified electronic format to the address indicated on the Customer Payment/Credit Transfer Form at least 15 days prior to the next billing date to be reflected in the next billing period.
vi. For Bill Credit Recipients enrolled in the Company's A-60 Residential Rate, the maximum annual allocation limit will be either 70% or 75% of their three (3) year annual average on-site usage depending on whether they are receiving a 30% or 25% Low-Income Discount.

2) Allocation of kWh Generation to Bill Credit Recipients:

i. Each Bill Credit Recipient will receive a monthly generated kWh allocation equal to the lesser of the Bill Credit Recipient's designated percentage allocation of the kWh output or the Bill Credit Recipient's on-site load for the applicable billing period. For Bill Credit

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Recipients of Standard DG Projects, the designated percentage allocation is one hundred (100) percent.

ii. Each Bill Credit Recipient will receive monthly generated kWh allocations so long as the cumulative annual allocation to each account is less than the Bill Credit Recipient's maximum annual limit, which is defined as the Bill Credit Recipient's three (3) year average on-site use. For Bill Credit Recipients that have not established a three (3) year on-site usage history, the maximum annual limit will be estimated initially. A Bill Credit Recipient may request that the Company reset its three (3) year annual average use once three (3) years of billing history is available.

3) Calculation of Bill Credits Applicable to Bill Credit Recipients and Residual Cash Payments:

If the Applicant selects Option 2, the DG Project must be reasonably designed and sized to produce electricity at an annual level equal to or less than 1) the Customer's On-Site Use or the aggregate On-site Use of all Bill Credit Recipients if the DG Project is a Shared Solar Facility, as measured over the previous three (3) years at the electric service account located at the Customer or Bill Credit Recipient's service location(s); 2) the annualized On-Site Use over the period of service to the Customer or Bill Credit Recipients' service location(s) if such service has been provided for less than three years; or 3) a reasonable estimate of annual On-Site Use if the DG Project is located at a new service location. The Applicant may change the selection only one time after the DG Project begins to operate provided that the Applicant gives the Company no less than 60 days' notice to implement the change. Additional changes to the method of compensation may be allowed at the discretion of the Company.

If the Applicant selects Option 2, the Performance-Based Incentive Payment shall be provided as follows:

The Bill Credit Recipient's bill will be based upon the On-Site Use, the retail delivery service charges and the Last Resort Service or Non-Regulated Power Producer charges in effect during the billing period and which apply to the Bill Credit Recipient's retail delivery service rate class. The Company shall apply a Bill Credit, as calculated below, to offset the Bill Credit Recipient's bill. The Bill Credit will appear on the Bill Credit Recipient's bill separate from the charges for on-site use.

BC = ALLOC (kWh) x (DC + TC + TrC + LRS)

Where:

BC = Bill Credit

ALLOC (kWh) = Bill Credit Recipient's allocated generated kWh as determined per Section 8.c.(2)(i).

DC = the distribution charge per RIPUC No. 2095, Summary of Retail Delivery Rates, as may be amended from time to time.

TC = the Transmission Charge per RIPUC No. 2095, Summary of Retail Delivery Rates, as may be amended from time to time.

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TrC = the Transition Charge per RIPUC No. 2095, Summary of Retail Delivery Rates, as may be amended from time to time.

LRS = the Last Resort Service charge applicable to the Bill Credit Recipient's retail delivery service rate class per RIPUC No. 2096, Summary of Last Resort Service Rates, as may be amended from time to time, exclusive of the renewable energy standard charge or credit.

The Performance-Based Incentive Payment less the sum of the Bill Credits for all Bill Credit Recipients will be paid in the form a check (or another agreed-upon means) to the recipient as identified on the Application. The Bill Credit Recipients will be responsible for paying any balance due on the electric bill in accordance with the Terms and Conditions for Distribution Service.

If the sum of the Bill Credits in a given month exceeds the Performance-Based Incentive Payment, the Bill Credit Recipients shall receive the full amount of the Bill Credit, which will not exceed the total of the per kWh delivery service charges and applicable Last Resort Service charges, excluding the customer charge and any applicable taxes. There will be no additional amounts related to the calculation of the Performance-Based Incentive Payment charged or credited to the Bill Credit Recipients or the recipient identified on the Application.

d. Performance-Based Incentive Payment for Community Remote Distributed Generation Systems

The Performance-Based Incentive Payment will be the fixed per-kWh Performance-Based Incentive, plus any adjustments where applicable, applied to the measured kWh produced by the DG Project, net of any Station Service. Distribution of the Performance-Based Incentive Payment will be in accordance with the rules below.

Applicants that have received a Final Certificate of Eligibility for a Community Remote Distributed Generation System will receive Performance-Based Incentive Payments in the form of Bill Credits applicable to a minimum of three (3) eligible Bill Credit Recipients and residual cash payments. Applicants will be responsible for designating Bill Credit Recipient billing accounts and other required information on the Customer Payment/Credit Transfer Form prior to the commercial operation date of the DG Project. Bill Credit Recipients will receive an allocation of generated kWh each month for purposes of determining monthly Bill Credits applicable to each Bill Credit Recipient account.

The following rules apply to the administration of Performance-Based Incentive Payments:

1) Bill Credit Recipient Accounts

i. No more than fifty percent (50%) of the kWh generated by the DG Project may be allocated to a single Bill Credit Recipient.
ii. At least fifty percent (50%) of the kWh generated by the DG Project must be allocated to multiple Bill Credit Recipients in an amount not to exceed that which is produced annually by a twenty-five kilowatt (25 kW) AC capacity system.

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iii. Provided that the conditions specified in (i) and (ii) above have been met, there is no limit to the number of Bill Credit Recipients that may receive Bill Credits from the DG Project. However, the aggregate kWh transferred to Bill Credit Recipients during a 12-month period, may not exceed the aggregate three (3) year average on site use of the Bill Credit Recipients. For Bill Credit Recipients that have less than three (3) years of actual on-site use, a projection of annual on-site use may be used until the actual three (3) year average on-site use becomes available for use in determining the number of eligible Bill Credit Recipients.
iv. Bill Credit Recipients may receive retail delivery service on any of the Company's rate schedules.

2) Allocation of kWh Generation to Bill Credit Recipients:

i. Applicant must specify each Bill Credit Recipient's percentage share of the DG Project's output on the Customer Payment/Credit Transfer Form.
ii. On a monthly basis, and in the aggregate, generated kWh may be allocated to Bill Credit Recipients up to the amount of available generated kWh.
iii. Generated kWh available to allocate during a month is equal to the current month's generated kWh plus the cumulative generated kWh not allocated during prior months.
iv. Allocation of generated kWh to Bill Credit Recipient accounts in any billing month will not exceed each individual Bill Credit Recipient's on-site use during that month.
v. If available aggregate generated kWh is greater than the sum of the Bill Credit Recipients' on-site use for the month, then all Bill Credit Recipients will receive a kWh allocation equal to their monthly use, subject to the Bill Credit Recipient's annual maximum limit.
vi. If available aggregate generated kWh is less than the sum of the Bill Credit Recipients' on-site use for the month, then all Bill Credit Recipients will receive a kWh allocation equal to their designated percentage share of generator output, subject to the Bill Credit Recipient's annual maximum limit.
vii. Bill Credit Recipients will receive monthly kWh allocations as long as the cumulative annual allocation is less than the Bill Credit Recipient's maximum annual limit.
viii. Each Bill Credit Recipient's maximum annual allocation limit will be that Bill Credit Recipient's three (3) year annual average on-site use. For Bill Credit Recipient accounts that have not established a three-year on-site usage history, the maximum annual allocation limit will be estimated initially. Bill Credit Recipients may request that the Company reset their three (3) year annual average once three (3) years of billing history is available.
ix. Unallocated generated kWh for each month will be calculated as the monthly generated kWh less the sum of the generated kWh allocated to the Bill Credit Recipients for the month. Unallocated generated kWh will be cumulated on an annual basis and the cumulative unallocated generated kWh calculated for each month will be used to increase or decrease the available generated kWh for the subsequent month within the program year. Any unallocated kWh remaining at the end of the program year will be paid to the designated cash recipient pursuant to Section 8.d.3.
x. Each Applicant may change the specified Bill Credit Recipients associated with a CRDG facility once per calendar quarter, and must provide such change in a specified electronic format to the address indicated on the Customer Payment/Credit Transfer Form at least 15 days prior to the next billing date to be reflected in the next billing period.

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xi. For Bill Credit Recipients enrolled in the Company's A-60 Residential Rate, the maximum annual allocation limit will be either 70% or 75% of their three (3) year annual average on-site usage depending on whether they are receiving a 30% or 25% Low-Income Discount.

3) Calculation of Bill Credits Applicable to Bill Credit Recipients:

The Bill Credit Recipient's bill will be based upon the On-Site Use, the retail delivery service charges and the Last Resort Service or Non-Regulated Power Producer charges in effect during the billing period and which apply to the Bill Credit Recipient's retail delivery service rate class. The Company shall apply a Bill Credit, as calculated below, to offset the Bill Credit Recipient's bill. The Bill Credit will appear on the Bill Credit Recipient's bill separate from the charges for on-site use.

BC = ALLOC (kWh) x Bill Credit Rate

Where:

BC = Bill Credit

ALLOC (kWh) = Bill Credit Recipient's allocated generated kWh as determined per Section 8.d.2.

BILL CREDIT RATE = a per kWh rate used to calculate each Bill Credit Recipient's monthly Bill Credit that may be either a fixed per kWh rate determined by the Applicant or the Default Bill Credit Rate. The Bill Credit Rate must be specified on the Customer Payment/Credit Transfer Form. The Default Bill Credit Rate is defined as the sum of the base Last Resort Service Rate, the Last Resort Service Adjustment Factor, the Last Resort Service Administrative Cost Adjustment Factor, the Transmission Service Cost Adjustment Factor, and the Non-bypassable Transition Service Charge, applicable to the Bill Credit Recipient's rate schedule in effect at the time of the application of the monthly Bill Credit to the Bill Credit Recipient's account. The fixed Bill Credit Rate must be equal to or less than the Default Bill Credit Rate in effect at the time that the Bill Credit Recipient's account information is submitted by the Applicant on the Customer Payment/Credit Transfer Form, and must be greater than the Minimum Bill Credit amount, as indicated in the Tariff Supplement for the Program Year in effect under which the Applicant received a Conditional Certificate of Eligibility. The Minimum Bill Credit amount will be calculated as 50% or the difference between the ceiling prices of non-CRDG facilities and CRDG facilities of the same technology and class, but in no case will be greater than 1.25¢ per kWh. The selection of the fixed or Default Bill Credit Rate applicable to each Bill Credit Recipient may not be changed once the initial selection is made.

4) Payment of Residual Performance-Based Incentive Payment

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i. Cash payment to the Applicant or designated payment recipient for each month will be as follows:

Cash Payment = Performance-Based Incentive Payment - (sum of Bill Credit Recipient Bill Credits) - (Unallocated Bill Credits)

Where

Unallocated Bill Credit=the unallocated generated kWh multiplied by the Default Bill Credit Rate applicable to the Applicant's rate class.

If the sum of the kWh allocated to the Bill Credit Recipients during a billing period is less than the monthly generation of the DG Project during the same period, the Unallocated Bill Credit will be calculated as the Default Bill Credit Rate multiplied by the difference between the monthly generated kWh and the sum of the kWh allocated to Bill Credit Recipients, and this amount will result in a decrease in the monthly cash payment.

If the sum of the kWh allocated to the Bill Credit Recipients during a billing period exceeds the monthly generation of the DG Project during the same period, but is less than the available generated kWh as defined in Section 8.d.2.ii, the Unallocated Bill Credit will be calculated as the Default Bill Credit Rate multiplied by the difference between the monthly generated kWh and the sum of the kWh allocated to Bill Credit Recipients, and this amount will result in an increase in the monthly cash payment.

ii. Any unallocated generated kWh remaining at the end of the Program Year will be valued at the average ISO-NE Locational Marginal Pricing rate that was realized by the settlement of the output with ISO-NE over the course of the year and will be paid to the designated payment recipient in a lump sum.

e. SolarWise Program

Standard DG Project Applicants who have been approved as qualifying for a SolarWise Bonus Award by October 1, 2017 are eligible to receive SolarWise Bonus payments. The PBI payments pursuant to Section 8.c of this Tariff will be adjusted to reflect the percentage increase applicable to the SolarWise Bonus Tier indicated on the Applicant's SolarWise Approval and Certificate of Eligibility.

Payments under the appropriate SolarWise Bonus Tier will be made pursuant to Option 2 described above. All solar PV systems eligible for SolarWise Bonus Award levels must be sized such that the maximum annual electric (kWh) output is not greater than the 3-year historic annual average electric (kWh) usage of the customer at that location minus the estimated annual electric energy (kWh) savings from the realized or committed measures on their SolarWise application. Systems can also be sized to produce less than the annual usage limit. The use of Excluded Technologies can adjust these calculations.

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Example: If a residential customer used an average of 10,000 kWh per year over the previous three years, and implemented energy savings of 2,000 kWh per year, the resulting SolarWise eligible system would be sized to produce no more than a maximum of 8,000 kWh in the course of a year. The maximum size of the customer's solar PV system (using a capacity factor of 14% for this example) would then decrease from 8.15 kW DC to 6.52 kW DC.

If a customer application included Excluded Technologies Adjustments, the system may be sized to include generation sufficient to power the eligible "Excluded Technologies." For example, if the customer example above also provided evidence of an electric vehicle in possession at the time of application that would consume 2,000 kWh per year, the eligible system size would increase to 8.15 kW, in order to generate 10,000 kWh per year. All of this production would be eligible for the SolarWise Bonus Awards.

The Company reserves the right to audit customers for compliance with commitments made to qualify for SolarWise Bonus Payments. If the requisite energy efficiency measures are not complete within twelve (12) months of the SolarWise application approval, the Company may withdraw the SolarWise Bonus Payment approval and the Tariff payments will revert to the applicable standard PBI without the SolarWise Bonus payment.

f. Incentive-Payment Adders for Renewable Energy Projects that Require Remediation

Commented [redacted]: This subsection header serves as a placeholder for the Brownfield Adder Pilot Plan proposed by the Distributed Generation Board in this proceeding, which is subject to the Public Utilities Commission's review and approval. As noted in the pre-filed testimony of Kimberly Gauntner, if approved, the Company will update this tariff as instructed by the Commission.

9. **Other Company Tariff Requirements**

a. The Company will provide the Customer with retail delivery service under the applicable retail delivery service tariff and the Company's Terms and Conditions for Distribution Service.

b. The Applicant is required to comply with Company's Standards for Connecting Distributed Generation. Any application by applicants for Projects seeking to qualify for the Small-Scale Solar class for interconnection under the Standards for Connecting Distributed Generation that is not complete and accurate will be rejected by the Company, as allowed by the Standards for Connecting Distributed Generation, and the applicant will need to resubmit its application for interconnection and Conditional Certificate of Eligibility under this program as a new application.

c. To be eligible to receive Renewable Net Metering Credits or excess Renewable Net Metering Credits pursuant to the Company's Net Metering Provision following the termination of the Customer's participation in the RE Growth Program, a DG Project and a Customer receiving credits from such a facility must comply with the applicable provisions of the Company's Net Metering Provision.

d. The Company's recovery of costs incurred to implement and administer the RE Growth Program is pursuant to the Renewable Energy Growth Program Cost Recovery Provision.

e. By participating in the Renewable Energy Growth Program and accepting a Conditional Certificate of Eligibility, all enrolled facilities shall be made available for inspection for quality and quantity

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assurance by the Rhode Island Office of Energy Resources, or its duly contracted agents, at the request of the Rhode Island Office of Energy Resources or its agent. Failure to allow such inspection with full access to the facility within 90 days from the date of the Office of Energy Resources' request for inspection will result in suspension of PBI payments until cured, and may result in termination of the Certificate of Eligibility after 180 days from the date of the Office of Energy Resources' request for inspection.

10. **Dispute Resolution**

If any dispute arises between the Company and either the Applicant or the Customer, the dispute shall be brought before the Commission for resolution. Such disputes may include but are not limited to those concerning the Rules, terms, conditions, rights, responsibilities, the termination of the Tariff or Tariff supplement, or the performance of the Applicant, the Customer, or the Company.

11. **Termination Provisions**

The Applicant and the Customer shall comply with the provision of this Tariff through the end of the term specified in the applicable Tariff supplement. The Applicant and the Customer may not terminate their obligations under this Tariff unless and until the Company consents to such termination. A formal request for termination must be submitted to the Company. Termination will be granted if the Applicant cannot fulfill the obligations because of an event or circumstance that is beyond the Applicant's reasonable control and for which the Applicant could not prevent or provide against by using commercially reasonable efforts. If these two conditions are met, ~~T~~the Company will not unreasonably delay or withhold its consent to an Applicant's request to terminate ~~if the Applicant cannot fulfill the obligations because of an event or circumstance that is beyond the Applicant's reasonable control and for which the Applicant could not prevent or provide against by using commercially reasonable efforts.~~

Commented [redacted]: This revision reflects the Company's proposal described in the pre-filed testimony of Mark Garland.

Only the DG Project described on the Certificate of Eligibility is eligible to participate under this Tariff. In no event shall an Applicant expand a DG Project's nameplate capacity beyond what is allowed by the Certificate of Eligibility. If a DG Project exceeds the nameplate capacity allowed by the Certificate of Eligibility, or the Company determines that a Customer or Applicant has violated the terms and conditions of this Tariff, the Company may, after notifying the Customer or Applicant in writing of such non-compliance and providing the Customer or Applicant a reasonable period to remedy such non-compliance and the violation persists, request the Commission to review the non-compliance and determine appropriate action, which may include requiring the Customer or Applicant to comply with the applicable provision being violated or revoking the Customer's or Applicant's Certificate of Eligibility.

12. **Statutory Authority**

This Tariff is filed in compliance with R.I. Gen. Laws. § 39-26.6-10. All revisions to the Tariff will be filed annually by November 15. Tariff supplements will be filed annually and following each scheduled RE Growth Program enrollment, as necessary. This Tariff and its supplements are subject to review, approval, and the exclusive jurisdiction of the Commission.

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Renewable Energy Growth Program for Non-Residential Customers
Tariff Supplement

Program Year: April 1, 2015 through March 31, 2016

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.G.L. § 39-26.6-20.

Term of Service represents the period of time during which the DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Facility, and the Term of Service for a particular DG Facility 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, Host Owned	1 to 10 kW	41.35¢	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	37.75¢	20 years
Small-Scale Solar I Third-Party Owned	1 to 10 kW	32.95¢	20 years
Small-Scale Solar II	11 to 25 kW	29.80¢	20 years
Medium-Scale Solar	26 to 250 kW	24.40¢	20 years

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Renewable Energy Class	Ceiling Price	Term of Service
Commercial-Scale Solar	20.95¢	20 years
Large-Scale Solar	16.70¢	20 years
Wind I (1.5MW to 2.99MW) with Investment Tax Credit	18.40¢	20 years
Wind I (1.5MW to 2.99MW) with Production Tax Credit	19.85¢	20 years
Wind I (1.5MW to 2.99MW) with No Federal Tax Incentives	22.75¢	20 years
Wind II (3.0MW to 5.0MW) with Investment Tax Credit	18.20¢	20 years
Wind II (3.0MW to 5.0MW) with Production Tax Credit	19.45¢	20 years
Wind II (3.0MW to 5.0MW) with No Federal Tax Incentives	22.35¢	20 years
Anaerobic Digestion (150kW to 1,000kW) with Production Tax Credit	20.20¢	20 years

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Renewable Energy Class	Ceiling Price	Term of Service
Anaerobic Digestion (150kW to 1,000kW) with No Federal Tax Incentives	20.60¢	20 years
Small-Scale Hydropower I (10kW to 250kW) with Production Tax Credit	19.80¢	20 years
Small-Scale Hydropower I (10kW to 250kW) with No Federal Tax Incentives	21.35¢	20 years
Small-Scale Hydropower II (251kW to 1,000kW) with Production Tax Credit	18.55¢	20 years
Small-Scale Hydropower II (251kW to 1,000kW) with No Federal Tax Incentives	20.10¢	20 years

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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.G.L. § 39-26.6-20.

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

Renewable Energy Class	System Size	Ceiling Price/Standard Performance-Based Incentive (per kWh)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase(1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase(1)	Term of Service
Small-Scale Solar I, Host Owned	1 to 10 kW	37.65¢	39.53¢	41.42¢	n/a	n/a	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	33.45¢	35.12¢	36.80¢	n/a	n/a	20 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	28.35¢	n/a	n/a	28.92¢	29.48¢	15 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	24.70¢	n/a	n/a	25.19¢	25.69¢	20 years
Small-Scale Solar II	11 to 25 kW	24.90¢	26.15¢	27.39¢	n/a	n/a	20 years

(1) SolarWise Bonus available only to DG Projects that have applied for and received approval for a SolarWise Bonus Tier prior to October 15, 2017.

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Renewable Energy Class	System Size	Ceiling Price/ Standard Performance-Based Incentive (per kWh)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase (1)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase(1)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase(1)	Term of Service
Small-Scale Solar II, Third-Party Owned	11 to 25 kW	24.90¢	n/a	n/a	25.40¢	25.90¢	20 years
Medium-Scale Solar (including ITC/PTC & Bonus Depreciation)	26 to 250 kW	22.55¢	23.68¢	24.81¢	n/a	n/a	20 years

(1) SolarWise Bonus available only to DG Projects that have applied for and received approval for a SolarWise Bonus Tier prior to October 15, 2017.

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Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar (including ITC/PTC & Bonus Depreciation)	19.30¢	20 years
Large-Scale Solar (including ITC/PTC & Bonus Depreciation)	15.10¢	20 years
Wind I (1.5MW to 2.99MW) (including ITC/PTC & Bonus Depreciation)	18.75¢	20 years
Wind II (3.0MW to 5.0MW, 2-turbine) (including ITC/PTC & Bonus Depreciation)	18.00¢	20 years
Wind III (3.0MW to 5.0MW, 3-turbine) (including ITC/PTC & Bonus Depreciation)	17.40¢	20 years
Anaerobic Digestion I (150kW to 500 kW) (including ITC/PTC & Bonus Depreciation)	20.00¢	20 years
Anaerobic Digestion II (10kW to 250 kW) (including ITC/PTC & Bonus Depreciation)	20.00¢	20 years
Small-Scale Hydropower I (251kW to 1,000kW) (including ITC/PTC & Bonus Depreciation)	18.65¢	20 years
Small-Scale Hydropower II (251kW to 1,000kW) (including ITC/PTC & Bonus Depreciation)	17.45¢	20 years

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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.G.L. § 39-26.6-20.

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

Renewable Energy Class	System Size	Ceiling Price/Standard Performance-Based Incentive (per kWh)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase(1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase (1)	Ceiling Price/Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase (1)	Term of Service
Small-Scale Solar I, Host Owned	1 to 10 kW	34.75¢	36.49¢	38.23¢	n/a	n/a	15 years
Small-Scale Solar I, Host Owned	1 to 10 kW	30.85¢	32.39¢	33.94¢	n/a	n/a	20 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	27.05¢	n/a	n/a	27.59¢	28.13¢	15 years
Small-Scale Solar I, Third-Party Owned	1 to 10 kW	24.05¢	n/a	n/a	24.53¢	25.01¢	20 years
Small-Scale Solar II	11 to 25 kW	27.75¢	29.14¢	30.53¢	n/a	n/a	20 years

(1) SolarWise Bonus available only to DG Projects that have applied for and received approval for a SolarWise Bonus Tier prior to October 15, 2017.

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Renewable Energy Class	System Size	Ceiling Price/ Standard Performance-Based Incentive (per kWh)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier I 5% increase (1)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier II 10% increase (1)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier I Third-Party Owned 2% increase (1)	Ceiling Price/ Standard Performance-Based Incentive (per kWh) with SolarWise Tier II Third-Party Owned 4% increase(1)	Term of Service
Small-Scale Solar II, Third-Party Owned	11 to 25 kW	27.75¢	n/a	n/a	28.31¢	28.86¢	20 years
Medium-Scale Solar	26 to 250 kW	22.75¢	23.89¢	25.03¢	n/a	n/a	20 years

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

(1) SolarWise Bonus available only to DG Projects that have applied for and received approval for a SolarWise Bonus Tier prior to October 15, 2017.

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Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar	18.75¢	20 years
Commercial-Scale Solar - CRDG	20.65¢	20 years
Large-Scale Solar	15.05¢	20 years
Large-Scale Solar – CRDG	16.85¢	20 years
Small Wind (10 to 999 kW)	21.45¢	20 years
Wind I (1.0MW to 2.99MW)	19.45¢	20 years
Wind I (1.0MW to 2.99MW) – CRDG	20.65¢	20 years
Wind II (3.0MW to 5.0MW, 2-turbine)	18.25¢	20 years

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Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Wind II (3.0MW to 5.0MW, 2-turbine) CRDG	19.35¢	20 years
Wind III (3.0MW to 5.0MW, 3-turbine)	17.35¢	20 years
Wind III (3.0MW to 5.0MW, 3-turbine) CRDG	18.55¢	20 years
Anaerobic Digestion I (150kW to 500 kW)	20.15¢	20 years
Anaerobic Digestion II (501kW to 1,000 kW)	20.15¢	20 years
Small-Scale Hydropower I (10kW to 250kW)	22.45¢	20 years
Small-Scale Hydropower II (251kW to 1,000kW)	22.45¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

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Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the current program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Wind I	0.600¢ per kWh
Wind II	0.550¢ per kWh
Wind III	0.600¢ per kWh
Commercial Solar	0.950¢ per kWh
Large Solar	0.950¢ per kWh

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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.G.L. § 39-26.6-20.

Term of Service represents the period of time during which the DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Project, and the Term of Service for a particular DG 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	1 to 10 kW	32.25¢	15 years
Small-Scale Solar I	1 to 10 kW	28.55¢	20 years
Small-Scale Solar II	11 to 25 kW	29.45¢	20 years
Medium-Scale Solar	26 to 250 kW	24.95¢	20 years

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

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

Program Year: April 1, 2018 through March 31, 2019

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar	19.65¢	20 years
Commercial-Scale Solar - CRDG	22.45¢	20 years
Large-Scale Solar	16.45¢	20 years
Large-Scale Solar – CRDG	18.92¢	20 years
Small Wind (1 to 999 kW)	22.25¢	20 years
Large Wind (1.0MW to 5.0MW)	17.55¢	20 years
Large Wind – CRDG (1.0MW to 5.0MW)	19.35¢	20 years

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

Program Year: April 1, 2018 through March 31, 2019

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Hydroelectric (1.0MW to 5.0MW)	24.55¢	20 years
Anaerobic Digestion I (1.0MW to 5.0 MW)	20.55¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the current program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Large Wind	0.900¢ per kWh
Commercial Solar	1.250¢ per kWh
Large Solar	1.2350¢ per kWh

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

Program Year: April 1, 2019 through March 31, 2020

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.G.L. § 39-26.6-20.

Term of Service represents the period of time during which the DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Project, and the Term of Service for a particular DG 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	1 to 10 kW	28.45¢	15 years
Small-Scale Solar I	1 to 10 kW	24.95¢	20 years
Small-Scale Solar II	11 to 25 kW	27.65¢	20 years
Medium-Scale Solar	26 to 250 kW	23.55¢	20 years

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

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

Program Year: April 1, 2019 through March 31, 2020

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar	17.85¢	20 years
Commercial-Scale Solar - CRDG	20.53¢	20 years
Large-Scale Solar	15.15¢	20 years
Large-Scale Solar – CRDG	17.42¢	20 years
Small Wind (1 to 999 kW)	24.05¢	20 years
Large Wind (1.0MW to 5.0MW)	19.35¢	20 years
Large Wind – CRDG (1.0MW to 5.0MW)	21.65¢	20 years

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

Program Year: April 1, 2019 through March 31, 2020

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Hydroelectric (1.0MW to 5.0MW)	27.15¢	20 years
Anaerobic Digestion I (1.0MW to 5.0 MW)	20.85¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the current program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Large Wind	1.135¢ per kWh
Commercial Solar	1.250¢ per kWh
Large Solar	1.150¢ per kWh

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

Program Year: April 1, 2020 through March 31, 2021

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 DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Project, and the Term of Service for a particular DG 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	1 to 10 kW	29.65¢	15 years
Small-Scale Solar II	11 to 25 kW	23.45¢	20 years
Medium-Scale Solar	26 to 250 kW	21.15¢	20 years

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

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

Program Year: April 1, 2020 through March 31, 2021

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar (251-999 kW DC)	18.25¢	20 years
Commercial-Scale Solar – CRDG (251-999 kW DC)	20.99¢	20 years
Large-Scale Solar – (1.0MW to 5.0MW)	13.65¢	20 years
Large-Scale Solar – CRDG - (1.0MW to 5.0MW)	15.70¢	20 years
Wind (up to 5.0MW)	18.85¢	20 years
Wind – CRDG (1.0MW to 5.0MW)	21.05¢	20 years
Anaerobic Digestion I (1.0MW to 5.0 MW)	15.35¢	20 years
Hydroelectric (1.0MW to 5.0MW)	21.45¢	20 years
Solar Carport Incentive	6¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Wind	1.10¢ per kWh
Commercial Solar	1.25¢ per kWh
Large Solar	1.03¢ per kWh

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

Program Year: April 1, 2021 through March 31, 2022

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 DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Project, and the Term of Service for a particular DG 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	1 to 15 kW DC	28.75¢	15 years
Small-Scale Solar II	16 to 25 kW DC	24.35¢	20 years
Medium-Scale Solar	26 to 250 kW DC	21.65¢	20 years

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

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

Program Year: April 1, 2021 through March 31, 2022

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar I (251-750 kW DC)	18.55¢	20 years
Commercial-Scale Solar II (751-999 kW DC)	15.25¢	20 years
Commercial-Scale Solar – CRDG (251-750 kW DC)	21.33¢	20 years
Commercial-Scale Solar – CRDG (751-999 kW DC)	17.54¢	20 years
Large-Scale Solar – (1.0MW to 5.0MW DC)	11.35¢	20 years
Large-Scale Solar – CRDG - (1.0MW to 5.0MW DC)	13.05¢	20 years
Wind (up to 5.0MW)	18.75¢	20 years
Wind – CRDG (up to 5.0MW)	21.05¢	20 years
Anaerobic Digestion I (up to 5.0 MW)	15.85¢	20 years
Hydroelectric (up to 5.0MW)	27.35¢	20 years
Solar Carport Incentive	5¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

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

Program Year: April 1, 2021 through March 31, 2022

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Wind	1.15¢ per kWh
Commercial Solar (251-750 kW)	1.25¢ per kWh
Commercial Solar (751-999 kW)	1.14¢ per kWh
Large Solar	0.85¢ per kWh

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

Program Year: April 1, 2022 through March 31, 2023

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 DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Project, and the Term of Service for a particular DG 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	1 to 15 kW DC	31.05¢	15 years
Small-Scale Solar II	16 to 25 kW DC	27.55¢	20 years
Medium-Scale Solar	26 to 250 kW DC	24.45¢	20 years

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

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

Program Year: April 1, 2022 through March 31, 2023

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar I (251-500 kW DC)	19.25¢	20 years
Commercial-Scale Solar II (501-999 kW DC)	15.75¢	20 years
Commercial-Scale Solar – CRDG (251-500 kW DC)	22.14¢	20 years
Commercial-Scale Solar – CRDG (501-999 kW DC)	18.11¢	20 years
Large-Scale Solar – (1.0MW to 5.0MW DC)	10.95¢	20 years
Large-Scale Solar – CRDG - (1.0MW to 5.0MW DC)	12.59¢	20 years
Wind (up to 5.0MW)	22.40¢	20 years
Wind – CRDG (up to 5.0MW)	24.60¢	20 years
Anaerobic Digestion (up to 5.0 MW)	25.55¢	20 years
Hydroelectric (up to 5.0MW)	37.15¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

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

Program Year: April 1, 2022 through March 31, 2023

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Wind	1.10¢ per kWh
Commercial Solar (251-500 kW)	1.25¢ per kWh
Commercial Solar (501-999 kW)	1.18¢ per kWh
Large Solar	0.82¢ per kWh

The Narragansett Electric Company
Renewable Energy Growth Program for Non-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 DG Project earns Performance-Based Incentive Payments. The billing month during which Performance-Based Incentive Payments begin will be specific to each individual DG Project, and the Term of Service for a particular DG 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
Medium-Scale Solar	>25 to 250 kW DC	25.65¢	20 years

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

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

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

Renewable Energy Class	Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar I (>250-500 kW DC)	22.05¢	20 years
Commercial-Scale Solar II (>500-1,000 kW DC)	19.05¢	20 years
Commercial-Scale Solar – CRDG (>250-500 kW DC)	25.15¢	20 years
Commercial-Scale Solar – CRDG (>500-1,000 kW DC)	21.91¢	20 years
Large-Scale Solar – (>1,000 to 5,000 kW DC	14.35¢	20 years
Large-Scale Solar – CRDG - (>1,000 to 5,000 kW DC)	16.50¢	20 years
Wind (>0 to 5,000 kW)	19.15¢	20 years
Wind – CRDG (>0 to 5,000 kW)	21.15¢	20 years
Anaerobic Digestion (>0 to 5,000 kW)	19.05¢	20 years
Hydroelectric (>0 to 5,000 kW)	31.95¢	20 years

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

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

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

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Wind (>0 to 5,000 kW)	1.00¢ per kWh
Commercial Solar (>250 to 500 kW)	1.25¢ per kWh
Commercial Solar (>500 to 1,000 kW)	1.25¢ per kWh
Large Solar (>1,000 to 5,000 kW)	1.075¢ per kWh

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

Program Year: April 1, 2024 through March 31, 2027

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

Renewable Energy Class	System Size	2024 Ceiling Price/Standard Performance-Based Incentive (per kWh)	2025 Ceiling Price/Standard Performance-Based Incentive (per kWh)	2026 Ceiling Price/Standard Performance-Based Incentive (per kWh)	Term of Service (Years)
Small-Scale Solar I	0 to 15 kW DC	36.45	TBD~~N/A~~	N/A	15
Small-Scale Solar II	>15 to 25 kW DC	33.15	~~N/A~~TBD	N/A	20
Medium-Scale Solar	>25 to 250 kW DC	33.15	31.95	31.35	20

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

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

Program Year: April 1, 2024 through March 31, 2027

Renewable Energy Class	2024 Ceiling Price (per kWh)	2025 Ceiling Price (per kWh)	2026 Ceiling Price (per kWh)	Term of Service
Commercial-Scale Solar I (>250-500 kW DC)	29.35	28.55	28.35	20
Commercial-Scale Solar II (>500 to <1,000 kW DC)	24.45	23.75	23.55	20
Large-Scale Solar I (1 to <5 MW DC)	18.65	18.05	17.85	20
Large-Scale Solar II (5 to <10 MW DC)	18.05	17.45	17.25	20
Large-Scale Solar III (10 to <15 MW DC)	18.05	17.45	17.25	20
Large-Scale Solar IV (15 to <39 MW DC)	18.05	17.45	17.25	20
CRDG Commercial-Scale Solar I (>250-500 kW DC)	32.25	31.45	31.25	20
CRDG Commercial-Scale Solar II (>500 to <1,000 kW DC)	27.35	26.65	26.35	20
CRDG Large-Scale Solar I (1 to <5 MW DC)	21.35	20.75	20.52	20
Wind (>0 to 5,000 kW)	20.25	19.85	19.85	20
CRDG Wind (>0 to 5,000 kW)	22.05	21.65	21.75	20
Anaerobic Digestion (>0 to 5,000 kW)	19.05	18.95	19.05	20
Hydroelectric (>0 to 5,000 kW)	34.15	33.35	33.45	20

*Note: All ceiling prices are assumed to be inclusive of all eligible federal incentives.

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

Program Year: April 1, 2024 through March 31, 2027

Minimum Bill Credit Amount for Community Remote Distributed Generation Facilities

The minimum bill credit is calculated as 50% of the difference between the ceiling prices for a Community Remote Distributed Generation project class and the standard ceiling price for the same facility size and technology, but in no case greater than 1.25¢. The Minimum Bill Credit Amounts for the program year are as follows:

Renewable Energy Class	Minimum Bill Credit
Wind (>0 to 5,000 kW)	1.00 cents per kWh
Commercial-Scale Solar I (>250-500 kW DC)	1.25 cents per kWh
Commercial-Scale Solar II (>500 kW to <1,000 kW DC)	1.25 cents per kWh
Large-Scale Solar I (1 to <5 MW DC)	1.075 cents per kWh

Schedule RIE-5

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TO: **Sustainable Energy Advantage (SEA) on behalf of Rhode Island Office of Energy Resources (OER) and the Distributed Generation Board (DG Board)**

FROM: **Rhode Island Energy**

DATE: **October 9th, 2024**

SUBJ: **RE Growth - Response to Initial Proposed Program Year 2025 Megawatt Allocation Plan**

Rhode Island Energy respectfully submits the following comments in response to SEA's Renewable Energy Growth (RE Growth) Program initial proposed Program Year 2025 (PY25) Megawatt Allocation Plan. Rhode Island Energy is dedicated to providing safe, reliable, affordable, and sustainable energy to our customers. As such, Rhode Island Energy reviews the initial proposed PY25 Megawatt Allocation Plan with the dual objective of (i) using our expertise to be a productive partner in advancing Rhode Island's climate and clean energy mandates and (ii) vetting program costs on behalf of our customers. Our review has a focus on competition and cost, in alignment with R.I. Gen. Laws §39-26.6-2, which states "The program shall be designed to finance the development, construction, and operation of renewable energy distributed-generation projects over five (5) years through a performance-based incentive system that is designed to achieve specified megawatt targets at reasonable cost through competitive processes" (emphasis added). Rhode Island Energy has replicated SEA's initial proposed PY25 Megawatt Allocation Plan below in Table 1.

SEA's Initial Proposed Megawatt Allocation Plan		
Renewable Energy Class	Plan A (MW)	Plan B (MW)
Small Scale I (0 - 15kW)	10	10
Small Scale II (>15 - 25kW)		
Medium Scale (>25 - 250kW)	7	7
Commercial Scale I (>250 - 500kW)	10	10
Commercial Scale II (>500 - <1000kW)	12.5	12.5
Large Scale I (1 - <5MW)	25	15
Large Scale II (5 - <10MW)	30	0
Large Scale III (10 - <15MW)	30	0
Large Scale IV (15 - <39MW)	0	0

Table 1

Rhode Island Energy appreciates the opportunity to provide data to SEA to inform their initial proposed PY25 Megawatt Allocation Plan, and the meetings that followed to discuss the data to ensure that it was being properly interpreted. Rhode Island Energy generally agrees with the approach to have a "Plan A" and "Plan B" PY25 Megawatt Allocation Plan, depending on the status of the Western Rhode Island Area Affected System Operator (ASO) Study #3. The initially proposed "Plan A" PY25 Megawatt Allocation Plan would be contingent upon ASO #3 completion at least 45 days prior to the PY25 Third Open Enrollment, and the megawatt allocation for Large-Scale Solar II, III, and IV would only be available in the PY25 Third Open Enrollment. If ASO #3 is not completed within that timeframe, then the "Plan B" PY25 Megawatt Allocation Plan would be effective. Rhode Island Energy also agrees with the recommendation that the

"Plan B" PY25 Megawatt Allocation Plan provide no megawatts of allocation for Large-Scale Solar II, III, and IV.

Regarding the solar renewable energy classes under 1 MW DC, Rhode Island Energy has competition and reasonable cost concerns, based on the historical enrollments in the RE Growth Program and probable high standard Performance-Based Incentive (PBI) rates. As shown in Table 2 below, the average total annual capacity of awarded projects in Medium-Scale Solar is 4.2 MW, with awarded capacities in 2022 and 2023 being significantly lower than the annual enrollment targets, and trending a similar way in 2024. A PY25 megawatt allocation of 7 MW may be too high to result in healthy competition. Similarly, the average total annual capacity of awarded projects in Commercial-Scale Solar is 5.3 MW, with awarded capacities from 2020 through 2023 not reaching the annual enrollment target and are trending a similar way in 2024. As such, a PY25 megawatt allocation of 22.5 MW may be too high to result in healthy competition. Small-Scale Solar projects, on the other hand, receive the standard PBI rate, which based on the estimations for Program Year 2025 from Docket 23-44-REG, were significantly higher than in the past. In summary, to allow for healthy competition and to balance the affordability and clean energy goals of the RE Growth Program, Rhode Island Energy recommends that SEA reduce the PY25 megawatt allocations for solar renewable energy classes under 1 MW DC to the minimum amount permissible pursuant to R.I. Gen. Laws §39-26.6-12.

Renewable Energy Growth Program: Solar <1MW Historical Program Participation						
Year	Small-Scale Solar (1-25 kW)		Medium-Scale Solar (26-250 kW)		Commercial-Scale Solar (251-999 kW)	
	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)
2015	3.4	3.0	2.7	4.0	4.1	5.5
2016	7.2	5.5	4.5	5.0	7.6	8.0
2017	7.1	6.6	3.6	3.0	5.3	5.0
2018	7.3	6.6	3.1	3.0	5.1	5.0
2019	5.8	12.2	7.2	6.8	8.4	7.3
2020	5.8	7.0	5.7	3.0	7.0	8.2
2021	12.9	7.0	6.4	5.0	7.2	12.0
2022	10.3	7.0	3.8	5.0	4.6	12.0
2023	0.6	9.0	1.9	5.0	0.4	12.0
2024*	2.0	9.0	2.6	5.0	3.8	18.0
Average	**6.2**	**7.3**	**4.2**	**4.5**	**5.3**	**9.3**
Max	**12.9**	**12.2**	**7.2**	**6.8**	**8.4**	**18.0**

*2024 only includes data from the 1st and 2nd open enrollments. For 2024 Small-Scale Solar, Awarded Projects is as of 10/8/2024.
**Data in this table is mainly derived from Docket 23-44-REG, Rhode Island Energy's Responses to PUC Data Requests, PUC 2-4.

Table 2

Regarding the Large-Scale Solar II renewable energy class megawatt allocation under Plan A, based on discussions with SEA, Rhode Island Energy agrees that eleven projects should be considered likely to be eligible to bid into PY25, pending ASO #3 completion as mentioned above. Historically, only a small percentage of projects are selected for RE Growth versus the number of net metering applications received. Table 3 below compares the total selected capacity in MW DC for each RE Growth Program Year to the received net metering applications in MW DC. The 5-year average percentage of projects that are selected in RE Growth, compared to the sum of selected RE Growth projects and net metering applications, is 17%. Although this number varies significantly year-to-year and depends on how the ceiling price and standard PBI rates compare to the energy market forecasts, among other factors, it is clear that a smaller proportion of projects historically chose RE Growth over net metering. Rhode Island

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Energy believes it is reasonable to assume that if the PY25 Megawatt Allocation Plan allowed for two to three projects to be awarded in Large-Scale Solar II, there may be healthy competition.

Renewable Energy Growth Program Selected MW vs Net Metering Application MW					
Year	RE Growth Selected MW DC	Net Metering Received MW AC	Net Metering Received MW DC	Total MW DC	% of RE Growth Selected MW DC vs Total MW DC
2019	49.0	227.0	295.1	344.1	14.2%
2020	44.0	180.0	234.0	278.0	15.8%
2021	52.0	122.0	158.6	210.6	24.7%
2022	34.0	65.0	84.5	118.5	28.7%
2023	8.0	100.0	130.0	138.0	5.8%
Total:	**187.0**	**694.0**	**902.2**	**1,089.2**	
Average:	**37.4**	**138.8**	**180.4**	**217.8**	**17.2%**

*From Docket No. 23-44-REG, from Rhode Island Energy's Response to PUC Data Request Set 1, from PUC 1-12, our team has created the table, which shows the Renewable Energy Growth Program selected MW DC for the previous five Program Years and compares it to the received Net Metering MW DC over the same time period.
** From Docket No. 23-44-REG, from DG Board and OER Filings, from SEA Schedule 4, Slide 12, the DC:AC ratio of 1.3 was utilized here.

Table 3

Regarding the Large-Scale Solar III renewable energy class megawatt allocation under Plan A, it seems that three projects should be considered likely to be eligible to bid into PY25, pending ASO #3 completion. Two of those projects are being developed by one developer. In addition, there are three projects that could possibly be eligible to bid into PY25, as they are not related to ASO #3, but it is unclear on how likely that may be. Rhode Island Energy believes it is reasonable to assume that if the PY25 Megawatt Allocation Plan allowed for one project to be awarded in Large-Scale Solar III, there may be healthy competition.

Table 4 below provides the initial proposed PY25 Megawatt Allocation Plan and a calculation of the minimum and maximum number of bids, per renewable energy class, that would be needed to meet the assigned megawatt allocation. For comparison, the number of bids received in PY24, and the associated number of kilowatts, is provided. The PY24 numbers are inclusive of the first and second open enrollments, except for small-scale solar, which is current as of October 9, 2024.

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Renewable Energy Class	PY25 MW Allocation Plan A/B	Plan A - Min Quantity of Projects To Meet MW Allocation	Plan A - Max Quantity of Projects To Meet MW Allocation	Quantity of Projects Bid in 2024 Program Year*	kW Bid in 2024 Program Year*
Large Scale IV (15 - <39MW)	0	-	-	-	-
Large Scale III (10 - <15MW)	30/0	2	3	N/A	N/A
Large Scale II (5 - <10MW)	30/0	3	6	N/A	N/A
Large Scale I (1 - <5MW)	25/15	5	25	1	3,300
Commercial Scale II (>500 - <1000kW)	12.5	12.5	25	5	4,560
Commercial Scale I (>250 - 500kW)	10	20	40	4	1,586
Medium Scale (>25 - 250kW)	7	28	280	17	2,612
Small Scale II (>15 - 25kW)*	10	400	1389***	265**	2,042**
Small Scale I (0 - 15kW)*					
*Except for Small-Scale Solar, only includes 1st and 2nd open enrollments. **As of 10/9/24. ***Assuming historic average size 7.2kW.					

Table 4

Rhode Island Energy has conducted a high-level analysis on the potential cost-to-customer impacts of the initial proposed PY25 Megawatt Allocation Plan below in Table 5, if 100% of the megawatt allocation is built, and that the PY25 ceiling price is awarded (except for Small-Scale Solar, where the PY24 Standard PBI rate was utilized). This is for illustrative purposes only. Rhode Island Energy will conduct a more detailed analysis when a final draft of the PY25 Megawatt Allocation Plan is provided.

Renewable Energy Class	PY25 MW Allocation Plan A/B	2025 Ceiling Price	Tariff Term	Plan A: Program Annual Cost	Plan A: Est Market Value	Plan A: Est Annual Net Cost
Large Scale IV (15 - <39MW)	0	17.45	20	$ -	$ -	$ -
Large Scale III (10 - <15MW)	30/0	17.45	20	$ 6,924,649	$ 3,517,483	$ 3,407,165
Large Scale II (5 - <10MW)	30/0	17.45	20	$ 6,924,649	$ 3,517,483	$ 3,407,165
Large Scale I (1 - <5MW)	25/15	18.05	20	$ 5,968,955	$ 2,931,236	$ 3,037,718
Commercial Scale II (>500 - <1000kW)	12.5	23.75	20	$ 3,796,913	$ 1,417,088	$ 2,379,825
Commercial Scale I (>250 - 500kW)	10	28.55	20	$ 3,651,431	$ 1,133,670	$ 2,517,761
Medium Scale (>25 - 250kW)	7	31.95	20	$ 2,840,802	$ 788,134	$ 2,052,669
Small Scale II (>15 - 25kW)*	10	33.15	20	$ 1,945,640	$ 520,246	$ 1,425,394
Small Scale I (0 - 15kW)*		36.45	15	$ 2,139,323	$ 520,246	$ 1,619,078
					Total - Plan A	$ 19,846,774
					Total - Plan B	$ 11,817,357
*The 2025 Ceiling Price for Small-Scale Solar is actually the Standard PBI rate for PY24. **The capacity factors used in the Program Annual Costs are from Docket 23-44-REG, from the RI DG Board and OER Filings, from SEA Schedule 5, slides 25-26. ***Assuming Small Scale I and II have an even megawatt split. ****Est. Market Value utilizes $0.05042/kWh for energy and $0.03822/kWh for RECs, from page 55 of Docket 23-24-REG.						

Table 5

Thank you for your time and collaboration in this effort.

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TO: **Sustainable Energy Advantage (SEA) on behalf of Rhode Island Office of Energy Resources (OER) and the Distributed Generation Board (DG Board)**

FROM: **Rhode Island Energy**

DATE: **October 24, 2024**

SUBJ: **RE Growth - Response to 10/16 Research, Analysis, & Discussion in Support of First Draft 2025 Program Year Small Solar Prices, MW Allocation, and Adder Pilot Recommendations**

In addition to the comments provided by Rhode Island Energy on 10/9/24 and 10/17/24 regarding the Renewable Energy Growth Program Year 2025 MW Allocation Plan, Small Scale Solar Prices and Adder Pilot Recommendations, Rhode Island Energy respectfully submits the following comments and questions on the information presented by SEA at OER's Solar Stakeholder Meeting on 10/16/24.

1. On Slide 10 of SEA's October 16th, 2024 presentation, SEA states that for Small Solar I and II, SEA will "continue to utilize the *median* installed cost data from NY, CT and MA programs, Energy Sage quotes, REF quotes, REG enrollments, and Lawrence Berkeley National Laboratory (LBNL) regional data." In Docket 23-44-REG, in the Rhode Island Distributed Generation Board (DG Board) and Office of Energy Resources (OER) filings, in the "Recommendations for the 2024-2026 Renewable Energy Growth Program Years" dated December 20, 2023, on page 36, regarding inputs for upfront capital costs for use in the CREST model for resources under 5 MW, SEA stated "Historically, SEA has aimed to incent projects that represent the lowest quartile of project costs, or in the case of the 2023 program year, an average of the lowest quartile and median costs, from other jurisdictions."

   RIE recommends that SEA utilize the historical approach, where the lowest quartile costs, or average of the lowest quartile and median costs, are used instead of the median costs. RIE also recommends providing a written evaluation of the difference in ceiling prices based on both lowest quartile and median costs for comparison.

2. In addition to the Median installed costs, does SEA consider sample size of the data sources? For example, on slide 37, for Small Solar II (partial year 2024), sample size of RI REF is 3, vs. NY - NYSERDA Solar Electric Programs, which has 898 projects for 2024. RIE recommends weighing sample size into the installed costs assumptions as they will have a noticeable impact on those assumptions, especially with RI REF being cost outliers at 39% higher than NYSERDA Solar Electric Programs and having only three projects as a sample size. As the installed costs are a significant input to the CREST model, these sample sizes of each are impactful to the recommend ceiling prices.

3. On Slide 15, SEA states that "Interest rates on 10 and 20-year treasury bonds have declined by over 100 basis points relative to the inputs assumed for 2025 during the 2024 ceiling price development process." Although SEA has not seen reduced rates in lenders that offer public rate quotes, would it be reasonable to assume that some decrease in interest rate for Small

Solar I and II projects would be expected, instead of no change in interest rates compared to the Program Year 2024 development process. As projects eligible to apply to the Renewable Energy Growth program must not have yet secured financing, the interest rates secured by eligible 2025 projects is very likely to be lower than the interest rates available for projects eligible in 2024, yet the values used for 1st Draft are the same as presented for 2025 PY on October 24, 2023 (slide 14)[1]. RIE recommends that these interest rates are updated to more current values or the values are estimated by the same or similar methodology that was used last year.

4. How does SEA estimate the land lease costs for adder-eligible projects and greenfield sites? What data sources are used for the cost of land leased? Have you utilized any studies or consulted with real estate professionals? Can anonymized data on the land lease costs in comparison to greenfield sites be provided? (Slide 24)

5. In comments provided on 10/9/24, Rhode Island Energy recommended that SEA reduce the PY25 megawatt allocations for solar renewable energy classes under 1 MW DC to the minimum amount permissible pursuant to R.I. Gen. Laws §39-26.6-12, which is 30 MW. RIE still believes that a MW allocation of ~30MW is both in line with historic participation and may drive a more competitive process. Table 1 below is RIE's recommended MW allocation plan for projects less than 1MW. Table 2 below provides the historic awarded MW in each of these classes which is used as the basis for the recommend MW allocation (This is the same as Table 2 provided in the 10/9/24 comments to SEA). As this is not the only possible solution, RIE welcomes further discussion.

RIE's Recommended Megawatt Allocation Plan		
Renewable Energy Class	**Plan A (MW)**	**Plan B (MW)**
Small Scale I (0 - 15kW)	9	9
Small Scale II (>15 - 25kW)		
Medium Scale (>25 - 250kW)	6	6
Commercial Scale I (>250 - 500kW)	7	7
Commercial Scale II (>500 - <1000kW)	8	8

Table 1

[1] https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2023-12/2344-SEA%20Schedule%203_0.pdf

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Renewable Energy Growth Program: Solar <1MW Historical Program Participation						
Year	Small-Scale Solar (1-25 kW)		Medium-Scale Solar (26-250 kW)		Commercial-Scale Solar (251-999 kW)	
	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)
2015	3.4	3.0	2.7	4.0	4.1	5.5
2016	7.2	5.5	4.5	5.0	7.6	8.0
2017	7.1	6.6	3.6	3.0	5.3	5.0
2018	7.3	6.6	3.1	3.0	5.1	5.0
2019	5.8	12.2	7.2	6.8	8.4	7.3
2020	5.8	7.0	5.7	3.0	7.0	8.2
2021	12.9	7.0	6.4	5.0	7.2	12.0
2022	10.3	7.0	3.8	5.0	4.6	12.0
2023	0.6	9.0	1.9	5.0	0.4	12.0
2024*	2.0	9.0	2.6	5.0	3.8	18.0
Average	**6.2**	**7.3**	**4.2**	**4.5**	**5.3**	**9.3**
Max	**12.9**	**12.2**	**7.2**	**6.8**	**8.4**	**18.0**

*2024 only includes data from the 1st and 2nd open enrollments. For 2024 Small-Scale Solar, Awarded Projects is as of 10/8/2024.
**Data in this table is mainly derived from Docket 23-44-REG, Rhode Island Energy's Responses to PUC Data Requests, PUC 2-4.

Table 2

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Renewable Energy Growth Program: Overview & Program Costs

Kimberly Gauntner, Manager - Clean Energy Procurement
September 23, 2024

Introduction and Objective

Objective:

Provide insight into Renewable Energy Growth enrollments and associated program costs

Calculations and values provided in this presentation are for illustrative and demonstrative purposes.

Affordability: Electricity Bill Impact

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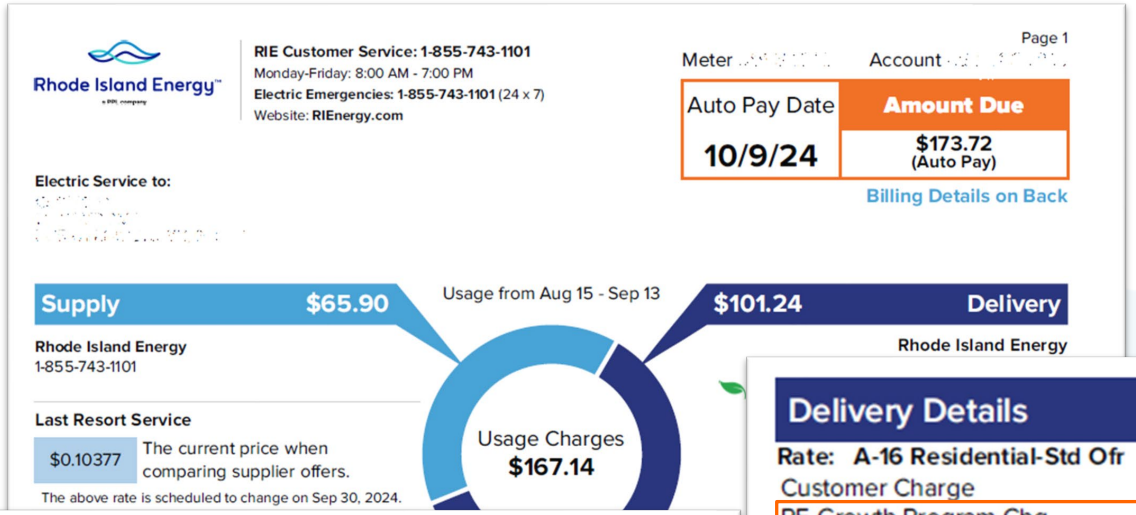
Rhode Island Energy

RIE Customer Service: 1-855-743-1101
Monday-Friday: 8:00 AM - 7:00 PM
Electric Emergencies: 1-855-743-1101 (24 x 7)
Website: RIEnergy.com

Page 1

Meter [redacted] Account [redacted]

Auto Pay Date	Amount Due
10/9/24	$173.72 (Auto Pay)

Billing Details on Back

Electric Service to:
[redacted]

Supply $65.90

Usage from Aug 15 - Sep 13

$101.24 Delivery

Rhode Island Energy
1-855-743-1101

Last Resort Service

$0.10377 The current price when comparing supplier offers.

The above rate is scheduled to change on Sep 30, 2024.

Usage Charges
$167.14

Rhode Island Energy

Understanding Your Bill - Continued

Supply Charge - The charge to provide electricity and other services to the customer by the supplier. This charge also includes the Renewable Energy Standard Charge which is being collected for the purpose of acquiring a portion of Rhode Island's energy supply from renewable energy resources, as required by R.I. General Laws section SS 39-26-1.

Delivery Details

Rate: A-16 Residential-Std Ofr

Customer Charge		6.00
RE Growth Program Chg		4.02
LIHEAP Enhancement Chg		0.79
Distribution Energy Chg	635 kWh at 0.06304	40.02
Renewable Energy Dist Chg	635 kWh at 0.02444	15.52
Energy Efficiency Programs	635 kWh at 0.01334	8.47
Transmission Charge	635 kWh at 0.04161	26.42
Total Delivery Charges		**$101.24**

Public Policy and Gross Earnings Tax comprise ~ 25% of "typical" Residential electric bill – and growing...

Net-Metering
Long-Term Contracts
Offshore Wind (future)

Insight: Public Policy & GET costs are approximately 25% of a "typical" 500kWh/mo electric bill. These drivers are expected to rapidly escalate in the coming years.

Business Use

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Renewable Energy Growth Program Success

Since 2015…

~216 MW of renewable energy enrolled

Small-Scale Solar: ~45MW at 7,637 total projects

Non-Small-Scale Solar: ~171MW at 230 total projects

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Renewable Energy Growth Program

Small Scale Solar

- Solar projects only
- Systems 25kW DC and below
- Continuous enrollment
- Non-competitive w/ annual MW cap

Non-Small-Scale Solar

- Various renewable energy classes e.g. wind, solar and hydro
- Sizes vary from >25 kW to 39,000 kW DC
- Three 2-week open enrollment periods per year
- Competitive w/ MW Allocation Cap for each renewable energy class

2024-Megawatt Allocation Plan

Renewable Energy Class	2024 Annual Enrollment Target (Nameplate MW)	Est Annual Cost	Est Market Value	Est Annual Net Cost
Small Scale Solar I (>0 - 15kW DC)	4.5	$ 1,724,231	$(188,412)	$ 1,535,819
Small Scale Solar II (>15-25kW DC)	4.5	$ 1,568,128	$ (188,412)	$ 1,535,819
Medium-Scale Solar (>25 - 250 kW DC)	5	$ 1,742,364	$ (529,270)	$ 1,213,094
Commercial-Scale Solar I (<250 to 500 kW DC)	7.5	$ 2,313,954	$ (793,905)	$ 1,520,049
Commercial-Scale Solar II (>500 to < 1,000 kW DC)	10.5	$ 2,698,693	$ (1,111,468)	$ 1,587,226
Large-Scale Solar I (1 to <5 MW DC)	15	$ 2,940,732	$ (1,587,811)	$ 1,352,921
Large-Scale Solar II (5 to <10 MW DC)	0	$ -	$ -	$ -
Large-Scale Solar III (10 to <15 MW DC)	0	$ -	$ -	$ -
Large-Scale Solar IV (15 to <39 MW DC)	0	$ -	$ -	$ -
CRDG Commercial-Scale Solar I (>250 to 500 kW DC)	0.5	$ 69,506	$ (52,927)	$ 116,579
CRDG Commercial-Scale Solar II (>500 to <1,000 kW DC)	1	$ 287,503	$ (105,854)	$ 181,649
CRDG Large-Scale Solar I (1 to <5 MW DC)	5	$ 1,122,156	$ (529,270)	$ 592,886
Wind (>0 to 5,000 kW)	1.5	$ 505,562	$ (271,261)	$ 234,301
CRDG Wind (>0 to 5,000 kW)	1.5	$ 550,500	$ (271,261)	$ 279,240
Anaerobic Digestion (>0 to 5,000 kW)	0.5	$ 675,856	$ (375,922)	$ 299,934
Small-Scale Hydropower (>0 to 5,000 kW)	0.5	$ 1,121,828	$ (348,571)	$ 773,257
Total	**57.5**	**$ 17,421,012**	**$(6,930,206)**	**$ 11,066,669**

Insight: The cost to customers for 2024 REG, if fully subscribed, would be ~$11M/y for 2024 Enrollments.

Example: 250kW Solar

250kW Solar (Medium Scale)
Renewable Energy Growth Bid Price: 24.44 ¢/kWh

Nameplate Size x Capacity Factor* x Hours Per Year = Est. kWh output

250kW x 13% x 8760 = 284,000 kWh

Energy Purchased at Contract Price

Est. Annual Cost @ 24.44 ¢/kWh

284,000 kWh x 24.44 ¢/kWh =

$69,580/year

Est. Market Value* @ 9.0 ¢/kWh

284,000 kWh x 9.0 ¢/kWh =

$25,632/year

Energy Sold at Market Value*

Insight: The Annual Contract Cost isn't the cost passed on to the ratepayer. The purchased energy is sold at market value + REC value; the delta between these costs is recovered from the ratepayer.

* Market value includes both energy and the renewable energy credit (REC)

Business Use

Cost Recovery: Example

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Renewable Energy Growth contracts to purchase all generated power from designated generators at a specific price.

Est. Annual Cost	–	Est. Market Value*	=	Est. Annual Net Cost
Power purchased under REG contract		*Sell power at the market value**		*Recovered through customer bills*
$69,580 /year	–	$25,632/year	=	$43,948/year
$1,391,600	–	$512,640	=	$878,960 Over 20-Year Tariff Term

Insight: All renewable energy and RECs are purchased at a contracted price and immediate resold at the market price (which varies). The REC is used for compliance or sold at market value.

* Market value includes both energy and the renewable energy credit (REC), except for small scale solar where only the REC is received/used by RIE

Annual Cost Recovery: Examples

Project Size	Renewable Energy Class	2024 Ceiling Price	Est Annual PBI Payment	Est Market Value	Est Annual Net Cost
10 kW	Small Scale Solar I (>0 - 15kW DC)	36.45	$ 4,151	$ (453)	$ 3,698
250 kW	Medium-Scale Solar (>25 - 250 kW DC)	33.15	$ 94,378	$ (25,623)	$ 68,755
999kW kW	Commercial-Scale Solar II (>500 to < 1,000 kW DC)	24.45	$ 278,158	$ (102,390)	$ 75,769
4,999kW	Large-Scale Solar I (1 to <5 MW DC)	18.65	$ 1,061,719	$ (512,358)	$ 549,361

Total annual recovery for four example projects: $797,582

Insight: All renewable energy and RECs are purchased at a contracted price and immediate resold at the market price (which varies). However, for Small Scale projects, only the REC is purchased and used for compliance or sold.

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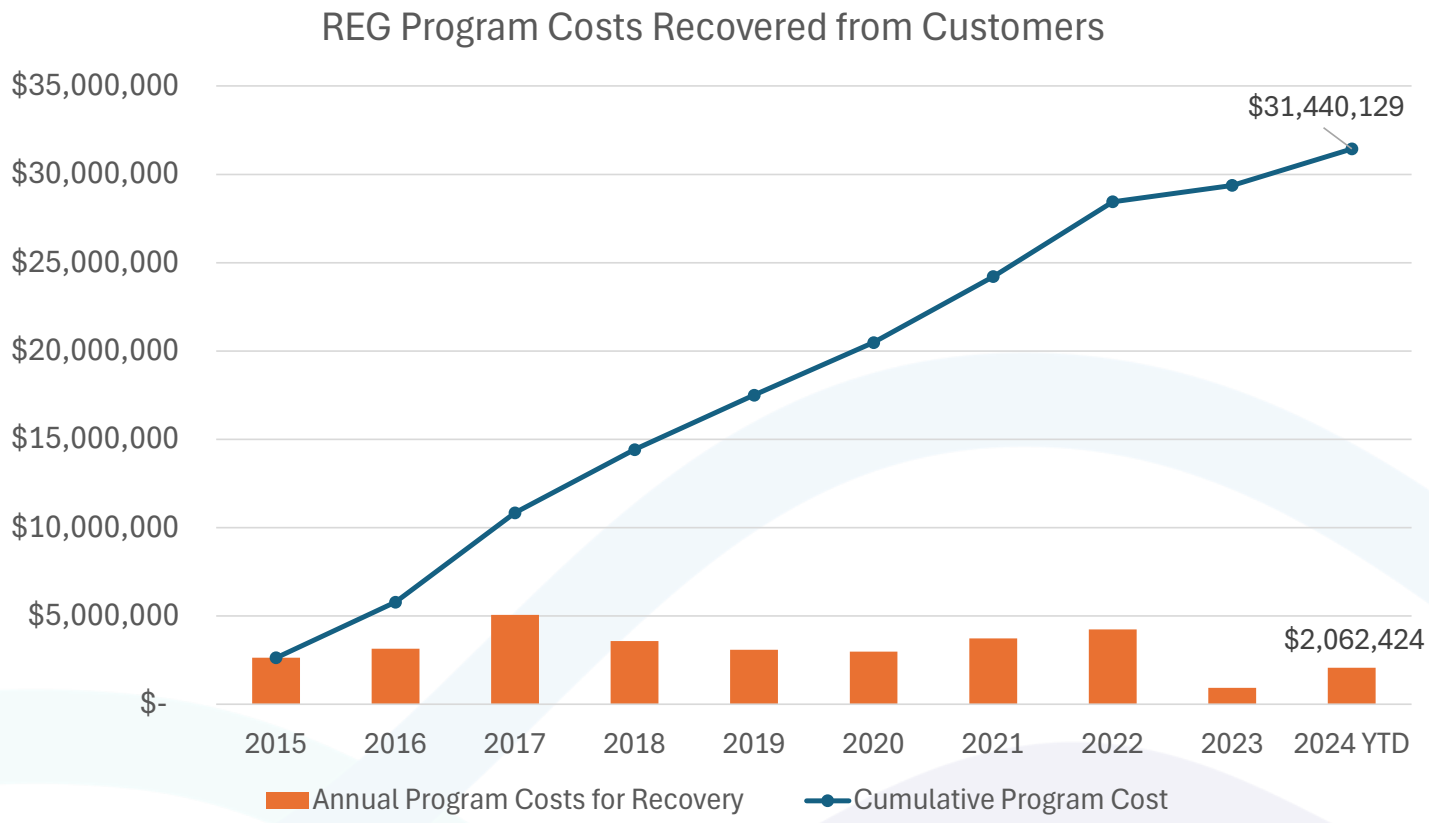


MW Enrolled By year	
2015	22,116
2016	14,750
2017	29,794
2018	22,982
2019	25,925
2020	28,555
2021	32,744
2022	21,788
2023	7,594
2024 YTD	9,662

Insight: Annual enrollments have increased program cost to customer an average of $3.1M/year since 2015. Cumulative program cost through 2024 YTD is $31.4M.

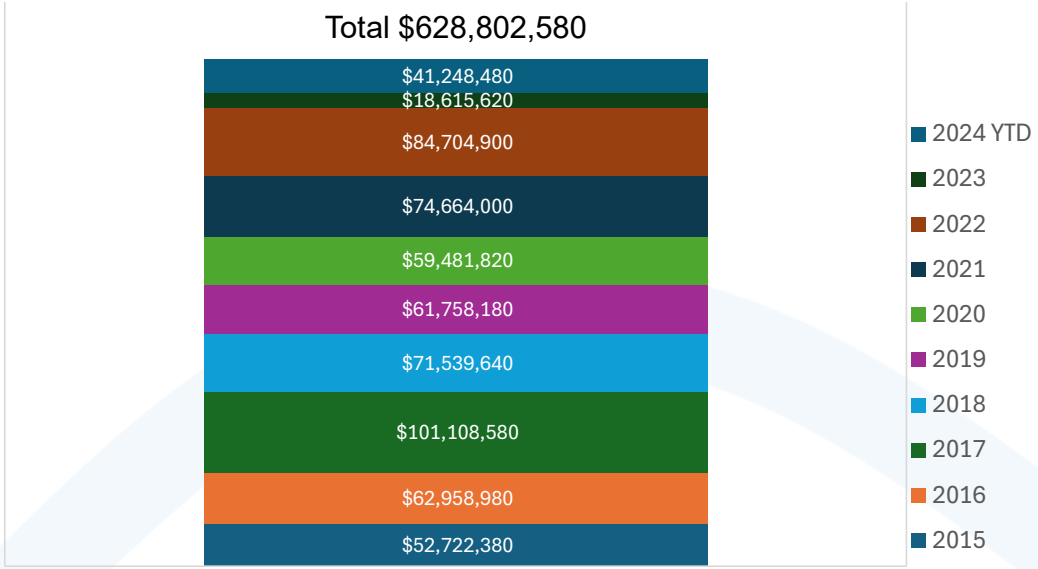
Total Cost Recovery: Example

Project Size	Renewable Energy Class	2024 Ceiling Price	Tariff Term (Years)	For Entire Tariff Term	
				Total PBI Payments to Customer	Total Cost to Customer
10 kW	Small Scale Solar I (>0 - 15kW DC)	36.45	15	$ 62,264	$ 55,465.25
250 kW	Medium-Scale Solar (>25 - 250 kW DC)	33.15	20	$1,887,561	$ 1,375,101
999 kW	Commercial-Scale Solar II (>500 to < 1,000 kW DC)	24.45	20	$ 5,563,163	$ 3,515,373
4,999 kW	Large-Scale Solar I (1 to <5 MW DC)	18.65	20	$ 21,234,372	$ 10,987,222

Tariff term cost to customer for example projects: $15,933,161

Insight: There are ~7800 Renewable Energy Growth enrollments each with 15- or 20-year terms. The cost of the entire project is annual payments times the tariff term length.

REG Cost to Customer by Enrollment Year



Insight: Total cost to customer for all ~7800 REG enrollments over the Tariff Terms will be $628,802,580. Recovered costs from ratepayers also include administrative costs to run the program, which are not included in these examples.

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Renewable Energy Programs: Comparison

	Renewable Energy Growth	Net-Metering	Long-Term Contracting Standards
Energy Price	Projects bid below ceiling prices set annually	Varies seasonally and annually with last resort service	Projects bid at "commercially reasonable" price
RECs	Yes	No	Yes
Terms	15 to 20-year terms at bid price	Life of the project	15 to 20-year terms at bid price; located anywhere in ISO-NE
Enrollment	Projects >25kW may only bid during three 2-week open enrollments annually	Rolling	RFPs are issued when enrollment falls below 90MW. (Recent RFPs: 2018 and 2024)
Overall Project Cost to Customer	$$$	$$$	$

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Thank you!

Kimberly Gauntner
Manager, Clean Energy Procurement
kwgauntner@pplweb.com

Schedule RIE-8

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Renewable Energy Growth Program: Overview & Program Costs

Kimberly Gauntner, Manager - Clean Energy Procurement
November 4, 2024

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Introduction and Objective

Objective:

Provide data and insight into the 2025 Renewable Energy Growth Program Year costs and MW enrollment targets.

Calculations and values provided in this presentation are for illustrative and demonstrative purposes.

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SEA's PY2025 Fully Subscribed Costs: Plan A

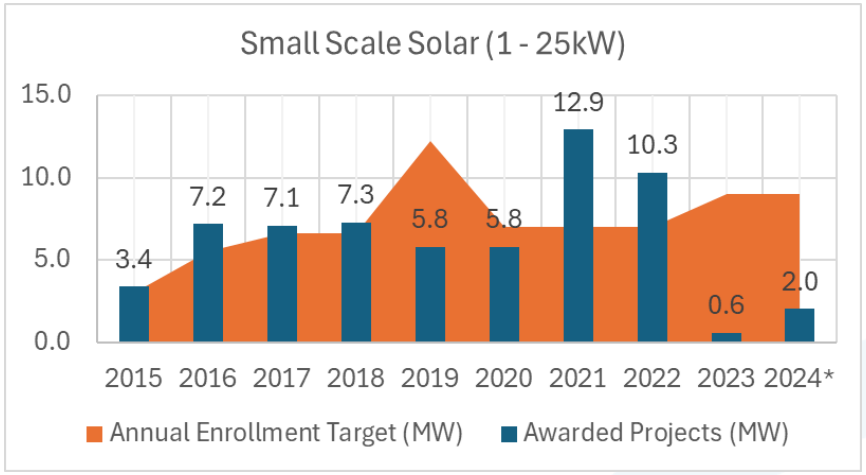
Plan A: Program Year 2025 MW Allocation Plan (as proposed by SEA)							
Renewable Energy Class	MW Allocation	2025 Ceiling Price	Capacity Factor	Tariff Term	Program Annual Cost	Est Market Value (annual)	Annual Net Cost to Customer
Small Scale I (0 - 15kW)*	9	34.55	13.4%	15	$ 1,825,028	$ (211,291)	$ 1,613,737
Small Scale II (>15 - 25kW)*		33.35	13.4%	20	$ 1,761,640	$ (211,291)	$ 1,550,349
Medium Scale (>25 - 250kW)	7	31.95	14.6%	20	$ 2,860,394	$ (805,745)	$ 2,054,649
Commercial Scale I (>250 - 500kW)	9.5	28.55	14.6%	20	$ 3,468,859	$ (1,093,511)	$ 2,375,348
Commercial Scale I (>250 - 500kW) CRDG	0.5	31.45	14.6%	20	$ 201,116	$ (57,553)	$ 143,563
Commercial Scale II (>500 - <1000kW)	11.5	23.75	14.6%	20	$ 3,493,160	$ (1,323,724)	$ 2,169,436
Commercial Scale II (>500 - <1000kW) CRDG	1	26.65	14.6%	20	$ 340,843	$ (115,106)	$ 225,736
Large Scale I (1 - <5MW)	20	18.05	15.1%	20	$ 4,775,164	$ (2,380,968)	$ 2,394,196
Large Scale I (1 - <5MW) CRDG	5	20.75	15.1%	20	$ 1,372,364	$ (595,242)	$ 777,122
Large Scale II (5 - <10MW)	30	17.45	15.1%	20	$ 6,924,649	$ (3,571,452)	$ 3,353,197
Large Scale III (10 - <15MW)	15	17.45	15.1%	20	$ 3,462,324	$ (1,785,726)	$ 1,676,598
Large Scale IV (15 - <39MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Wind*	3	19.85	21.0%	20	$ 547,741	$ (248,346)	$ 299,395
Wind CRDG*		21.65	21.0%	20	$ 597,410	$ (248,346)	$ 349,064
Small Sale Hydro*	1	33.35	55.0%	20	$ 803,402	$ (216,810)	$ 586,592
Aerobic Digestion*		18.95	92.0%	20	$ 763,609	$ (362,664)	$ 400,945
Total MW Allocation	112.5			**Total**	$ 33,197,702	$ (13,227,775)	$ 19,969,927
*Assumes even split of MW allocation between classes							

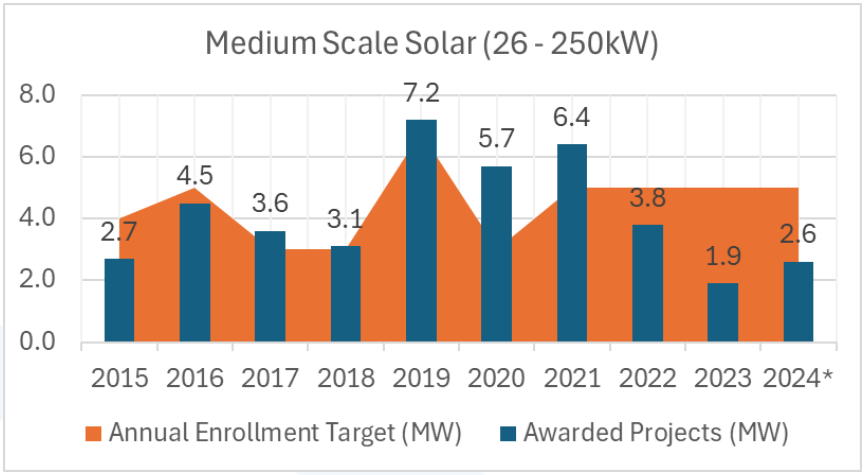
SEA's PY2025 Fully Subscribed Costs: Plan B

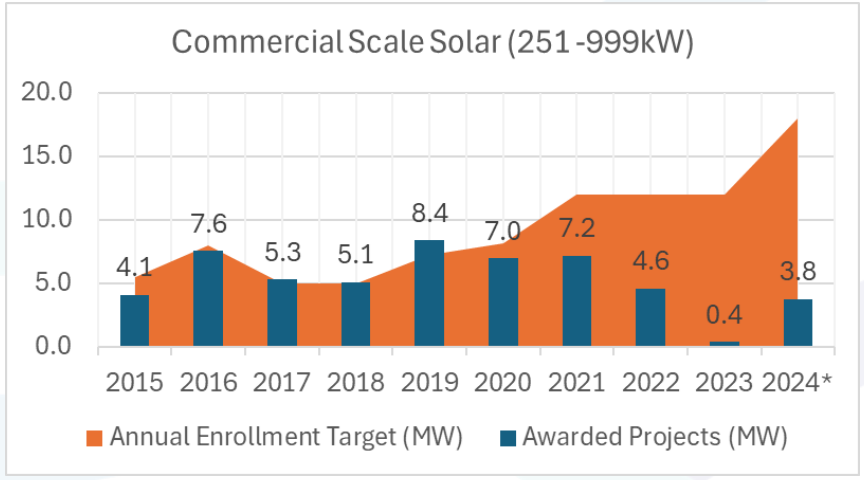
Plan B: Program Year 2025 MW Allocation Plan (as proposed by SEA)							
Renewable Energy Class	MW Allocation	2025 Ceiling Price	Capacity Factor	Tariff Term	Program Annual Cost	Est Market Value (annual)	Annual Net Cost to Customer
Small Scale I (0 - 15kW)*	9	34.55	13.4%	15	$ 1,825,028	$ (211,291)	$ 1,613,737
Small Scale II (>15 - 25kW)*		33.35	13.4%	20	$ 1,761,640	$ (211,291)	$ 1,550,349
Medium Scale (>25 - 250kW)	7	31.95	14.6%	20	$ 2,860,394	$ (805,745)	$ 2,054,649
Commercial Scale I (>250 - 500kW)	9.5	28.55	14.6%	20	$ 3,468,859	$ (1,093,511)	$ 2,375,348
Commercial Scale I (>250 - 500kW) CRDG	0.5	31.45	14.6%	20	$ 201,116	$ (57,553)	$ 143,563
Commercial Scale II (>500 - <1000kW)	11.5	23.75	14.6%	20	$ 3,493,160	$ (1,323,724)	$ 2,169,436
Commercial Scale II (>500 - <1000kW) CRDG	1	26.65	14.6%	20	$ 340,843	$ (115,106)	$ 225,736
Large Scale I (1 - <5MW)	10	18.05	15.1%	20	$ 2,387,582	$ (1,190,484)	$ 1,197,098
Large Scale I (1 - <5MW) CRDG	5	20.75	15.1%	20	$ 1,372,364	$ (595,242)	$ 777,122
Large Scale II (5 - <10MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Large Scale III (10 - <15MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Large Scale IV (15 - <39MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Wind*	3	19.85	21.0%	20	$ 547,741	$ (248,346)	$ 299,395
Wind CRDG*		21.65	21.0%	20	$ 597,410	$ (248,346)	$ 349,064
Small Sale Hydro*	1	33.35	55.0%	20	$ 803,402	$ (216,810)	$ 586,592
Aerobic Digestion*		18.95	92.0%	20	$ 763,609	$ (362,664)	$ 400,945
Total MW Allocation	57.5			**Total**	$ 20,423,147	$ (6,680,113)	$ 13,743,034
*Assumes even split of MW allocation between classes							

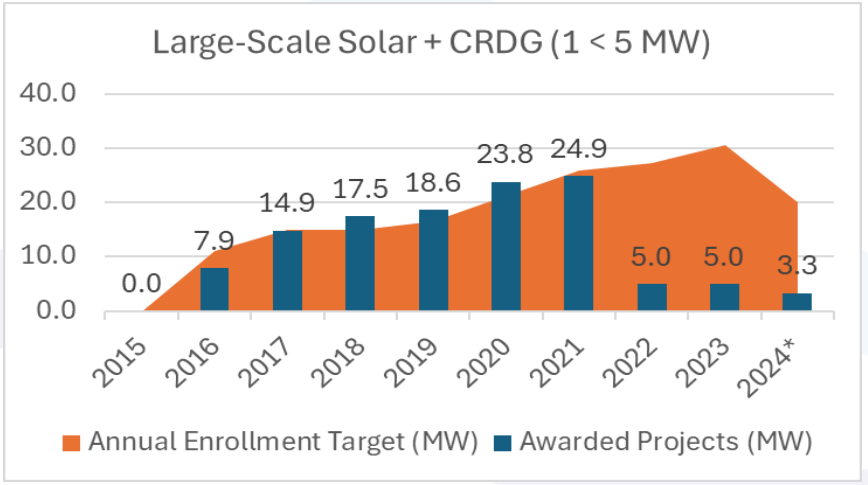
Business Use

Historic Enrollment in Renewable Energy Classes









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* 2024 Data is through the end of the end OE for 2024. Data details can be found in Appendix A.

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Comparison of MW Allocation Plans

Renewable Energy Class*	SEA Proposal		RIE Recommendation	
	Plan A (MW)	Plan B (MW)	Plan A (MW)	Plan B (MW)
Small Scale I (0 - 15kW)	9	9	9	9
Small Scale II (>15 - 25kW)				
Medium Scale (>25 - 250kW)	7	7	6	6
Commercial Scale I (>250 - 500kW)	10	10	7	7
Commercial Scale II (>500 - <1000kW)	12.5	12.5	8	8
Large Scale I (1 - <5MW)	20	10	20	10
Large Scale I (1 - <5MW) CRDG	5	5	5	5
Large Scale II (5 - <10MW)	30	0	30	0
Large Scale III (10 - <15MW)	15	0	15	0
Large Scale IV (15 - <39MW)	0	0	0	0
Wind	3	3	3	3
Small Scale Hydro	1	1	1	1
Aerobic Digestion				
Total MW	112.5	57.5	104	49
Annual Net Cost to Customer	$ 19,969,927	$ 13,743,034	$ 18,077,386	$ 11,850,493

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RIE's PY2025 Fully Subscribed Costs: Plan A

Plan A: Program Year 2025 MW Allocation Plan (as recommended by RIE)							
Renewable Energy Class	RIE Recommended PY25 MW Allocation	2025 Ceiling Price	Capacity Factor	Tariff Term	Program Annual Cost	Est Market Value (annual)	Annual Net Cost to Customer
Small Scale I (0 - 15kW)*	9	34.55	13.4%	15	$ 1,825,028	$ (211,291)	$ 1,613,737
Small Scale II (>15 - 25kW)*		33.35	13.4%	20	$ 1,761,640	$ (211,291)	$ 1,550,349
Medium Scale (>25 - 250kW)	6	31.95	14.6%	20	$ 2,451,766	$ (690,638)	$ 1,761,128
Commercial Scale I (>250 - 500kW)	6.5	28.55	14.6%	20	$ 2,373,430	$ (748,192)	$ 1,625,238
Commercial Scale I (>250 - 500kW) CRDG	0.5	31.45	14.6%	20	$ 201,116	$ (57,553)	$ 143,563
Commercial Scale II (>500 - <1000kW)	7	23.75	14.6%	20	$ 2,126,271	$ (805,745)	$ 1,320,526
Commercial Scale II (>500 - <1000kW) CRDG	1	26.65	14.6%	20	$ 340,843	$ (115,106)	$ 225,736
Large Scale I (1 - <5MW)	20	18.05	15.1%	20	$ 4,775,164	$ (2,380,968)	$ 2,394,196
Large Scale I (1 - <5MW) CRDG	5	20.75	15.1%	20	$ 1,372,364	$ (595,242)	$ 777,122
Large Scale II (5 - <10MW)	30	17.45	15.1%	20	$ 6,924,649	$ (3,571,452)	$ 3,353,197
Large Scale III (10 - <15MW)	15	17.45	15.1%	20	$ 3,462,324	$ (1,785,726)	$ 1,676,598
Large Scale IV (15 - <39MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Wind*	3	19.85	21.0%	20	$ 547,741	$ (248,346)	$ 299,395
Wind CRDG*		21.65	21.0%	20	$ 597,410	$ (248,346)	$ 349,064
Small Sale Hydro*	1	33.35	55.0%	20	$ 803,402	$ (216,810)	$ 586,592
Aerobic Digestion*		18.95	92.0%	20	$ 763,609	$ (362,664)	$ 400,945
Total MW Allocation	104			**Total**	$ 30,326,756	$ (12,249,371)	$ 18,077,386
*Assumes even split of MW allocation between classes							

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RIE's PY2025 Fully Subscribed Costs: Plan B

Plan B: Program Year 2025 MW Allocation Plan (as recommended by RIE)							
Renewable Energy Class	RIE Recommended PY25 MW Allocation	2025 Ceiling Price	Capacity Factor	Tariff Term	Program Annual Cost	Est Market Value (annual)	Annual Net Cost to Customer
Small Scale I (0 - 15kW)*	9	34.55	13.4%	15	$ 1,825,028	$ (211,291)	$ 1,613,737
Small Scale II (>15 - 25kW)*		33.35	13.4%	20	$ 1,761,640	$ (211,291)	$ 1,550,349
Medium Scale (>25 - 250kW)	6	31.95	14.6%	20	$ 2,451,766	$ (690,638)	$ 1,761,128
Commercial Scale I (>250 - 500kW)	6.5	28.55	14.6%	20	$ 2,373,430	$ (748,192)	$ 1,625,238
Commercial Scale I (>250 - 500kW) CRDG	0.5	31.45	14.6%	20	$ 201,116	$ (57,553)	$ 143,563
Commercial Scale II (>500 - <1000kW)	7	23.75	14.6%	20	$ 2,126,271	$ (805,745)	$ 1,320,526
Commercial Scale II (>500 - <1000kW) CRDG	1	26.65	14.6%	20	$ 340,843	$ (115,106)	$ 225,736
Large Scale I (1 - <5MW)	10	18.05	15.1%	20	$ 2,387,582	$ (1,190,484)	$ 1,197,098
Large Scale I (1 - <5MW) CRDG	5	20.75	15.1%	20	$ 1,372,364	$ (595,242)	$ 777,122
Large Scale II (5 - <10MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Large Scale III (10 - <15MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Large Scale IV (15 - <39MW)	0	17.45	15.1%	20	$ -	$ -	$ -
Wind*	3	19.85	21.0%	20	$ 547,741	$ (248,346)	$ 299,395
Wind CRDG*		21.65	21.0%	20	$ 597,410	$ (248,346)	$ 349,064
Small Sale Hydro*	1	33.35	55.0%	20	$ 803,402	$ (216,810)	$ 586,592
Aerobic Digestion*		18.95	92.0%	20	$ 763,609	$ (362,664)	$ 400,945
Total MW Allocation	49			**Total**	$ 17,552,202	$ (5,701,709)	$ 11,850,493
*Assumes even split of MW allocation between classes							

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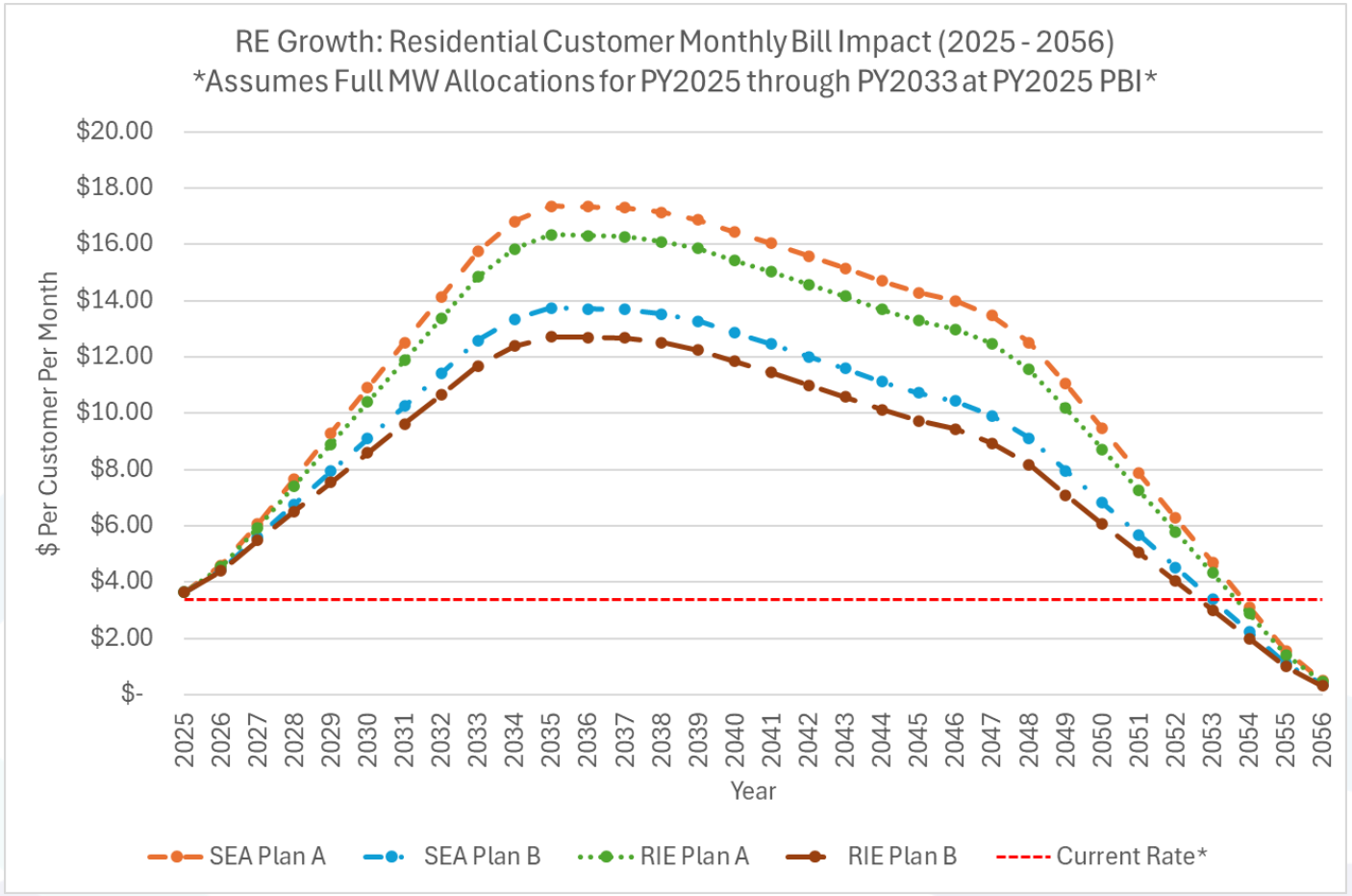
PY25 Fully Subscribed Bill Impacts

*The Renewable Energy Growth program recovery rate on a residential bill is $3.40 for 2024.

When adding in the annual reconciliation factor (for under or overcollection in the prior year), the total 2024 bill impact is $4.02.



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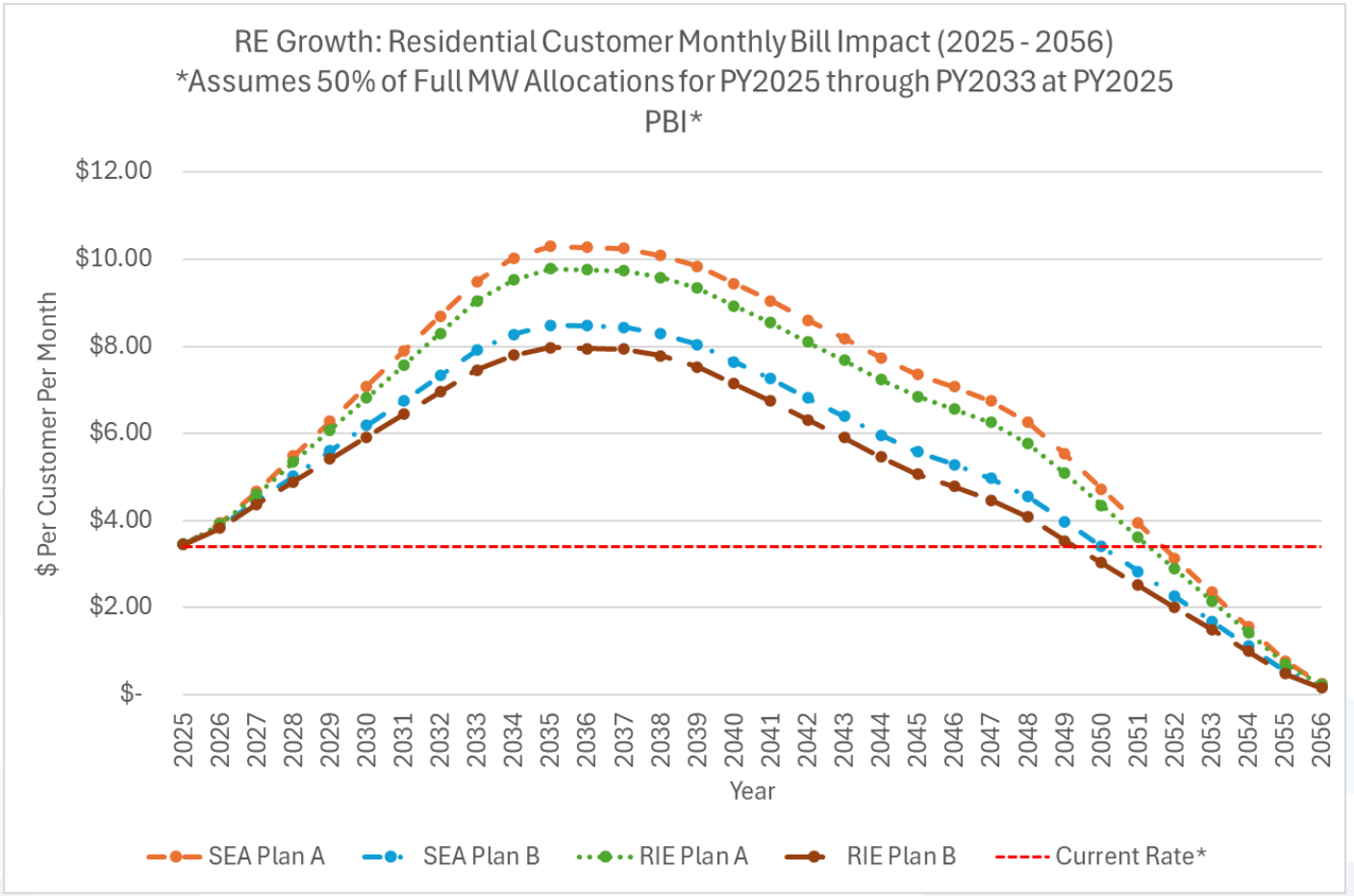
PY25 50% Subscribed Bill Impacts

*The Renewable Energy Growth program recovery rate on a residential bill is $3.40 for 2024.

When adding in the annual reconciliation factor (for under or overcollection in the prior year), the total 2024 bill impact is $4.02.



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Thank you!

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Appendix A

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Renewable Energy Growth Program: Historical Program Participation of Solar								
Year	Small-Scale Solar (1-25 kW)		Medium-Scale Solar (26-250 kW)		Commercial-Scale Solar (251-999 kW)		Large-Scale Solar + CRDG (1 - < 5MW)	
	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)	Awarded Projects (MW)	Annual Enrollment Target (MW)
2015	3.4	3.0	2.7	4.0	4.1	5.5	0.0	0.0
2016	7.2	5.5	4.5	5.0	7.6	8.0	7.9	11.0
2017	7.1	6.6	3.6	3.0	5.3	5.0	14.9	15.1
2018	7.3	6.6	3.1	3.0	5.1	5.0	17.5	15.1
2019	5.8	12.2	7.2	6.8	8.4	7.3	18.6	16.6
2020	5.8	7.0	5.7	3.0	7.0	8.2	23.8	21.3
2021	12.9	7.0	6.4	5.0	7.2	12.0	24.9	25.9
2022	10.3	7.0	3.8	5.0	4.6	12.0	5.0	27.3
2023	0.6	9.0	1.9	5.0	0.4	12.0	5.0	30.6
2024*	2.0	9.0	2.6	5.0	3.8	18.0	3.3	20.0
Average	**6.2**	**7.3**	**4.2**	**4.5**	**5.3**	**9.3**	**12.1**	**18.3**
Max	**12.9**	**12.2**	**7.2**	**6.8**	**8.4**	**18.0**	**24.9**	**30.6**

*2024 only includes data from the 1st and 2nd open enrollments. For 2024 Small-Scale Solar, Awarded Projects is as of 10/8/2024.
**Data in this table is mainly derived from Docket 23-44-REG, Rhode Island Energy's Responses to PUC Data Requests, PUC 2-4.