



Stephanie De LaRosa
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888
November 18, 2024

Renewable Energy Fund Comments on Brownfield Remediation Adder Proposal

Dear Ms. De LaRosa,

The Renewable Energy Fund has reviewed Rhode Island Energy's comments dated October 17th in response to the RI Office of Energy Resources' consultant, Sustainable Energy Advantage (SEA)'s request for comments related to the Brownfield Adder at the OER solar stakeholder meeting on September 10, 2025. In the section "REF Brownfields Fund" Rhode Island Energy requested that the REF program administrators explore changing the REF Rules and Regulations to allow the REF to fund Renewable Energy Growth projects. The REF staff, in consultation with OER, have identified several issues with making this change.

First, the timeline to update the REF Rules and Regulations is unreasonable given the start date of the adder for Program Year 2025. While there are plans to update this document, the timeline to do so was included in OER's Solar for All workplan submitted to the Environmental Protection Agency (EPA) on October 28, 2024. As of the date of this letter, EPA has not yet approved OER's Solar for All workplan and timeline. However, assuming approval, the timeline OER filed indicated the REF would start the process to update the Rules and Regulations in January 2025 and complete the process by December 2025. According to the Office of Management and Budget, the best-case scenario for an agency's timeline for updating rules and regulations is at least 120 days. This does not account for the determination as to whether the document must complete a cost benefit analysis. It is anticipated that the REF will need a full calendar year to complete the update.

Next, the REF lacks the administrative capacity and resources to accommodate further expansion. This year the REF, in collaboration with OER, launched two new programs, the Affordable Solar Access Pathways program and a diversity program within the Clean Energy Internship program. Later this year, a new microgrid feasibility program will launch. In addition, the REF has plans to take on three new programs in late 2025, funded through Solar for All. The REF team carefully reviewed current processes and upcoming administrative needs before OER submitted the Solar for All application to EPA. Additional programs, such as a new brownfield REG program, was not budgeted for in terms of administrative capacity and resources. The REF is currently at its statutory limit of staff capacity and hiring given the 10% administrative cap in R.I. Gen. Laws § 39-26-7 making adding new programs incredibly challenging.

The REF requires 100% inspections associated with projects that receive funding. Currently, the REF does not have a funding source to provide inspections beyond the current programs offered. As such, new funding would need to be identified to cover the cost of inspections for a new REG brownfield program.

Finally, the REF Brownfield program was designed to primarily support smaller commercial-sized brownfield projects, with a majority of projects qualifying for the program being under a megawatt. The REF has a limited funding pool based on allocations from RGGI funds, with approximately \$1.2 million available for the Brownfield program currently. Based on the revenue requirements for REG-eligible Large Solar I and II brownfields calculated by SEA, a fully subscribed REG adder pilot program would require funds greater than the total funds available under the REF. As such, the REF team is concerned that, if REF funding were leveraged for such projects, it would significantly impact available funds at the expense of supporting the smaller commercial-sized projects that the REF incentives were designed to support.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script that reads "K. Stewart". The signature is written in black ink and is positioned above the typed name.

Karen Stewart
Program Manager
Renewable Energy Fund