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February 5, 2025

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

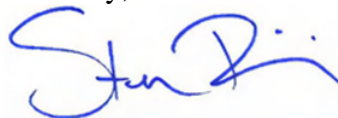
**RE: Docket No. 24-50-REG – RI Distributed Generation Board
2025 Renewable Energy Growth Program
Reply Testimony of Kenneth M. Campbell**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed the Company’s reply testimony of witness Kenneth M. Campbell in the above-referenced docket.

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

Sincerely,



Steven J. Boyajian

Enclosure

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

February 5, 2025

Date

**Docket No. 24-50-REG – Renewable Energy Growth Program for Year 2025
The Narragansett Electric Company & RI Distributed Generation Board
Service List updated 12/18/2024**

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REPLY TESTIMONY

OF

KENNETH M. CAMPBELL

February 5, 2025

Table of Contents

I.	Introduction and Adoption of Testimony.....	1
II.	Purpose and Structure of Testimony.....	4
III.	PUC’s January 27, 2025 Notice to Parties in Docket No. 24-50-REG.....	4
IV.	Plan A and Plan B Designation in Megawatt Allocation Plan.....	7
V.	Conclusion	12

1 **I. Introduction and Adoption of Testimony**

2 **Q. Mr. Campbell, please state your name and business address.**

3 A. My name is Kenneth M. Campbell. My business address is 827 Hausman Road,
4 Allentown, PA 18104.

5
6 **Q. Please describe by whom you are employed and in what capacity.**

7 A. I am employed as a Senior Energy Procurement Specialist for PPL Services Corporation.
8 My responsibilities include co-managing the open enrollment process for the Renewable
9 Energy Growth Program and managing the offshore wind program for The Narragansett
10 Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the
11 “Company”). In addition, I support the Long-Term Contracting Standard for the
12 Company, as well as other support functions in the energy procurement group.

13
14 **Q. Please describe your professional and educational background.**

15 A. I graduated from Rensselaer Polytechnic Institute in 2016 with a Bachelor of Science in
16 Biology and a minor in Sustainability Studies. I began my career in December 2016 with
17 Greener by Design, LLC, where I worked as a Junior Energy Consultant, and was later
18 promoted to Energy Consultant in June 2017. In February 2019, I was promoted to the
19 position of Project Manager in the Energy Division. During my time at Greener by
20 Design, LLC, my primary responsibilities included identifying and implementing energy
21 efficiency, renewable energy, and power reliability projects for a variety of clients,

1 including public entities, hospitals, prisons, sewage treatment plants, and large
2 development firms, where I both managed and responded to request for proposals
3 (“RFPs”).
4

5 In May 2020, I was hired by SodexoMAGIC, functioning as the North American
6 Sustainability Lead for a major pharmaceutical company, working to identify and
7 implement energy, water, and waste efficiency measures throughout a portfolio of
8 facilities. In May 2022, I became a Certified Energy Manager from the Association of
9 Energy Engineers.
10

11 In November 2022, I was hired by PPL Services Corporation as a Senior Energy RFP
12 Specialist. My title was changed in 2024 to Senior Energy Procurement Specialist, with
13 no change in my responsibilities, which is the position I currently hold.
14

15 **Q. Have you previously testified before the Rhode Island Public Utilities Commission**
16 **(“PUC” or “Commission”)?**

17 A. Yes. I have testified on behalf of Rhode Island Energy in Docket No. 23-44-REG
18 regarding the Rhode Island Renewable Energy Growth Program for 2024 and in Docket
19 No. 23-50-EL regarding Proposed Revisions to RFP for Long-Term Contracting Standard
20 for Renewable Energy and Renewable Energy Certificates.
21

1 **Q. Please describe your role relating to this Docket.**

2 A. I have been involved in Docket 24-50-REG during each step of the process. I reviewed
3 the various presentations from Sustainable Energy Advantage, LLC (“SEA”) and
4 provided feedback or comments, worked with the Company’s Customer Energy
5 Integration group (“CEI group”) to respond to the SEA data request to the Company, met
6 with SEA to discuss their competition analysis, and participated in the creation of the
7 Distributed Generation Board presentations and the Company’s filing.

8
9 **Q. Have you reviewed Kimberly Gauntner’s Direct Pre-Filed Testimony and**
10 **Schedules?**

11 A. Yes, I have.

12

13 **Q. Do you adopt Kimberly Gauntner’s Direct Pre-Filed Testimony and Schedules?**

14 A. Yes, I do.

15

16 **Q. Have you reviewed the Company’s Responses to the Division’s Data Requests Set 1,**
17 **prepared by or under the supervision of Evan Armstrong?**

18 A. Yes, I have.

19

20 **Q. Do you adopt Evan Armstrong’s Data Request Responses?**

21 A. Yes, I do.

1 **II. Purpose and Structure of Testimony**

2 **Q. What is the purpose of your reply testimony?**

3 A. The purpose of this testimony is two-fold. First, it is to respond to the Commission's
4 January 27, 2025 notice to the parties in this docket ("PUC's REG Notice") regarding the
5 Company's RIPUC No. 2151-K, Renewable Energy Growth Program for Residential
6 Customers ("Residential Tariff"), Section 6.c. Second, this testimony presents the
7 Company's position on the designation between the Plan A and Plan B Megawatt
8 Allocation Plan, including recommending clarification about the circumstances under
9 which Plan A or Plan B should be implemented.

10

11 **III. PUC's January 27, 2025 Notice to Parties in Docket No. 24-50-REG**

12 **Q. Have you reviewed the Commission's January 27, 2025 notice to the parties in this**
13 **docket ("PUC's REG Notice") regarding the RIPUC No. 2151-K, Renewable Energy**
14 **Growth Program for Residential Customers ("Residential Tariff"), Section 6.c?**

15 A. Yes, I have.

16

17 **Q. Have you reviewed the record requests and the PUC's post-hearing data requests**
18 **referenced in the PUC's REG Notice?**

19 A. Yes, I have.

20

1 **Q. Have you reviewed R.I. Gen. Laws § 39-26.6-20(d) and (e)?**

2 A. Yes, I have.

3

4 **Q. If the value of the Bill Credit exceeds the value of the fixed Performance-Based**
5 **Incentive for a given month, should the applicant and/or Bill Credit Recipient be**
6 **able to keep the excess value related to the higher Bill Credit rate?**

7 A. The Company's position, based on its review of applicable statutes and tariffs, and in
8 particular R.I. Gen. Laws § 39-26.6-20(d)-(e), is that the value of the Bill Credit should
9 be capped at the value of the fixed Performance-Based Incentive. R.I. Gen. Laws § 39-
10 26.6-20(e)(1-4), provides that the total value of the performance-based incentive per-
11 kilowatt-hour should be the same, regardless of which payment option is utilized:

- 12 (1) The owner is compensated solely through direct payments under the
13 performance-based incentive provisions of this chapter for the life of the
14 tariff term with no net metering implemented; or
15 (2) The owner is compensated through a combination of direct payments and
16 the bill credit value of net metering for the life of the term of the tariff
17 under the provisions of this chapter.
18 (3) In the case of residential small-scale solar projects, only option (2) shall be
19 available.
20 (4) In either option, the total value of the performance-based incentive per-
21 kilowatt-hour is the same...
22

1 **Q. Is it the Company's position that the value of the Bill Credit should not exceed the**
2 **value of the fixed Performance-Based Incentive in a given month, for both the**
3 **Residential and the Non-Residential Tariff?**

4 A. Yes. The applicable statutes do not differentiate between residential and non-residential
5 applicants with respect to the limitation on Bill Credits to the amount of the fixed
6 Performance-Based Incentive. Therefore, it is the Company's position that the value of
7 Bill Credits should not exceed the value of the fixed Performance-Based Incentive in a
8 given month under both the Residential and Non-Residential Tariff.

9
10 **Q. If the PUC approved the aforementioned tariff revision, when could the Company**
11 **implement it?**

12 A. The Company could implement the aforementioned tariff revision for Program Year
13 2025. To implement this revision, the Company would need to make billing system
14 modifications to either cap the Bill Credit value, reconcile any overcompensation after
15 the fact, or provide for another method to enact this change. It would be possible to enact
16 some form of billing system modification to projects approved in Program Year 2025,
17 and for each Program Year moving forward. If a Bill Credit cap is determined to be the
18 best option, it would take some time to build that into the billing system. Prior to the
19 completion of the Bill Credit cap billing system modification, the Company could
20 perform a one-time reconciliation.

21

1 **IV. Plan A and Plan B Designation in Megawatt Allocation Plan**

2 **Q. Have you reviewed the Amended Report and Recommendations for the 2025**
3 **Renewable Energy Growth Program Year and SEA Testimony (“SEA Amended**
4 **Testimony”) submitted on December 20, 2024, by the Rhode Island Distributed**
5 **Generation Board (“DG Board”) and Office of Energy Resources (“OER”)?**

6 A. Yes, I have.

7

8 **Q. Please explain the Company’s position on the Megawatt Allocation Plan consisting**
9 **of both a Plan A and a Plan B, dependent on the outcome of the Company’s third**
10 **Affected System Operator (ASO #3) study.**

11 A. The Company supports the general concept of having alternative Megawatt Allocation
12 Plans (Plan A and Plan B), depending on the status of the active ASO #3 applications.
13 There is a significant capacity of projects greater than one megawatt in size currently in
14 the ASO #3 project portfolio, so the status of the ASO #3 applications is essential in
15 determining if sufficient competition could exist in the Large-Scale Solar renewable
16 energy classes. However, the exact verbiage that governs whether Plan A or Plan B will
17 take effect requires modification.

18

19 **Q. How does the SEA Amended Testimony describe the designation between the Plan A**
20 **and Plan B Megawatt Allocation Plan?**

21 A. Page 9 of the SEA Amended Testimony states:

1 Plan A refers to the DG Board’s recommended plan in the case that RI Energy can
2 finalize ASO#3 results, including any required re-studies, by forty-five (45) days
3 prior to the anticipated opening of the Third Open Enrollment window for the
4 2025 Program Year. Plan B refers to the DG Board’s recommended plan in the
5 case that RI Energy cannot finalize any potential ASO Attrition Studies forty-five
6 (45) days prior to the anticipated opening of the Third Open Enrollment window
7 for the 2025 Program Year.
8

9 **Q. Please identify your concerns with the aforementioned proposed language.**

10 A. The Company has two concerns with the language as proposed by SEA which are
11 described more fully below. First, SEA’s phrase “RI Energy can finalize ASO#3 results”
12 is insufficiently precise. Second, the designation warrants additional specificity regarding
13 potential future ASO #3 Transmission Attrition Studies (an Attrition Study is prompted
14 by developer request, Company request, or ISO-NE requirements, with the objective of
15 restudying impacts under a different set of parameters or a different portfolio of projects)
16 and other unforeseen events.
17

18 **Q. What are the interconnection study requirements to bid into the Renewable Energy
19 Growth Program for projects that are not Small-Scale Solar projects?**

20 A. Section 2.1.1 of the Renewable Energy Growth Program Solicitation and Enrollment
21 Process Rules for Solar (Greater than 25 kW), Wind, Hydro and Anaerobic Digester
22 Projects (“Solar (Greater Than 25kW), Wind, Hydro and Anaerobic Digester Rules”)
23 states that projects must have received a completed Impact Study for Renewable DG
24 (ISR DG) from the Company, or a valid Interconnection Service Agreement (“ISA”).
25

1 **Q. Please explain the current status of the ASO #3 studies and identify the next steps**
2 **for the ASO #3 applications.**

3 A. Each “ASO study” consists of a Transmission System Impact Study (analyzes the impacts
4 of a portfolio (“cluster”) of projects on the transmission system), potential Transmission
5 Attrition Study/ies (an Attrition Study is prompted by developer request, Company
6 request, or ISO-NE requirements, with the objective of restudying impacts under a
7 different set of parameters or a different portfolio of projects), and multiple Distribution
8 System Impact Studies (each study analyzes the impacts of a subset of project(s) on the
9 distribution system). ISAs are provided following the completion of the Distribution
10 System Impact Studies, if requested. Note that a Transmission Attrition Study may be
11 requested at any point in time up until a project is commercially operational, including
12 after ISAs have been provided.

13
14 The ASO #3 Transmission System Impact Study was completed on December 5, 2024,
15 and required transmission system upgrades, and their associated costs have been
16 communicated to the ASO #3 developers. The Company cannot predict whether there
17 will be a Transmission Attrition Study. The Company is currently performing the
18 Distribution System Impact Studies, which are anticipated to take 35 to 45 business days
19 to complete. Following completion of the Distribution System Impact Studies, the
20 Company will communicate the required distribution system upgrades and their
21 associated costs and allow 15 business days for each developer to decide whether to

1 proceed to ISA. If a developer proceeds to an ISA, the Company has 15 business days to
2 deliver an ISA that can be executed. Note that a Transmission Attrition Study may be
3 requested at any time.

4
5 **Q. Please describe the risk a Transmission Attrition Study poses to projects being**
6 **eligible to bid into the Third Open Enrollment.**

7 A. Projects may withdraw their ASO #3 applications, which can affect the allocation of the
8 transmission system upgrade costs for the remaining projects. An increased percentage
9 allocation of transmission system upgrade costs could lead to additional project attrition
10 due to the increased cost allocation, which could have a cascading effect where more and
11 more ASO #3 developers withdraw their applications due to costs. If a significant portion
12 of projects withdraw their ASO #3 applications, an ASO #3 Transmission Attrition Study
13 may be requested, where the remaining projects will be studied to ascertain if fewer
14 transmission system upgrades are required. If fewer transmission system upgrades are
15 required, it is anticipated that this will decrease the transmission system upgrade costs,
16 which would mitigate the impact of having a higher percentage allocation of the ASO #3
17 transmission system upgrade costs. If an ASO #3 Transmission Attrition Study is
18 requested, then the remaining projects in the ASO #3 portfolio may not be ready for
19 participating in the Third Open Enrollment, depending on the timing of the study among
20 other factors.

21

1 **Q. What does the Company recommend with respect to language governing the**
2 **selection between the Plan A and the Plan B Megawatt Allocation Plan?**

3 A. The Company recommends the following language, which provides additional specificity
4 regarding potential future ASO #3 Transmission Attrition Studies and other unforeseen
5 events, with the purpose of giving clear guidance to developers but providing flexibility
6 to switch to Plan B in a situation where there is little to no competition due to ASO #3
7 applications being ineligible to bid. The language is intended to provide more certainty
8 that an ASO #3 Transmission Attrition Study will not be required by decreasing the
9 number of days between that determination and the Third Open Enrollment from 45 days
10 to 30 days. In the event that an ASO #3 Transmission Attrition Study is required, it also
11 provides enough time for an ASO #3 Transmission Attrition Study to be completed and
12 for projects to receive a Distribution System Impact Study to be eligible to bid. Finally, it
13 provides the Company with discretion to switch to Plan B if an event like an ASO #3
14 Transmission Attrition Study occurs in very close proximity to the Third Open
15 Enrollment, which would make ASO #3 applications ineligible to bid. To address these
16 issues, the Company recommends the following language:

17 The Plan A Megawatt Allocation Plan will be used if there has been no ASO #3
18 Transmission Attrition Study initiated thirty (30) days prior to the anticipated
19 opening of the Third Open Enrollment, or if there is significant project attrition
20 and the Company determines that an ASO #3 Transmission Attrition Study is
21 required, that the ASO #3 Transmission Attrition Study is complete and valid
22 forty-five (45) days prior to the anticipated opening of the Third Open
23 Enrollment. If neither of these conditions are met, or if the Company determines
24 that the ASO #3 applications will be unable to bid due to unforeseen events, the
25 Plan B Megawatt Allocation Plan will be used.

1 V. Conclusion

2 Q. Does this conclude your testimony?

3 A. Yes.