

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: THE OFFICE OF ENERGY RESOURCES' : DOCKET NO.: 25-13-REG  
(OER) BUDGET REQUESTS TO PERFORM 2026 :  
RENEWABLE ENERGY GROWTH PROGRAM :  
DEVELOPMENT :**

**OFFICE OF ENERGY RESOURCES (OER) AND/OR DISTRIBUTED GENERATION  
BOARD (DG BOARD) RESPONSE TO PUBLIC UTILITIES COMMISSION'S FIRST  
SET OF DATA REQUESTS**

**(Issued May 22, 2025; Due June 5, 2025)**

**PUC 1-1**

**Please explain why the regulatory process task for program year 2026 is anticipated to cost \$32,621 when in program year 2025, the actual cost was \$9,391.**

In program year 2025, OER utilized Sustainable Energy Advantage (SEA) for two tasks: 2025 REG Ceiling Price Development and a refresh of Landfill/Brownfield Adder to the develop an adder pilot program. OER covered the adder pilot at its own expense as a continuation of the work begun in the 2024 Program Year cycle. This was the result of the need to competitively procure the REG program development consulting services in the summer of 2024, while still allowing SEA to begin development of the adder-related tasks.

Regarding the reasonableness of the anticipated regulatory support budget for 2026 of \$32,621, the cost of \$9,391 referenced in PUC 1-1 and OER's May 27 budget memorandum was the estimate established during program scoping and approved by the DG Board as part of the not to exceed budget. While the Landfill/Brownfield Adder Refresh incurred costs overlapping with the Ceiling Price Development for regulatory support, given the continuance of the effort from the 2024 PY and timelines resulting from the procurement process, OER determined it would not seek recovery of the overlapping costs, and causes the disparity between the 2025 and 2026 PY budgets.

**PUC 1-2**

**In the 2025 RE Growth Program filing made by OER/DG Board, SEA included testimony about a megawatt (MW) allocation plan, but there was no cost recovery sought in Docket No. 25-09-REG. Please provide an itemization of the activities and expenses associated with the MW allocation plans in program years 2025 and 2026.**

A review of the 2025 REG Ceiling Price Development shows \$4325 billed for work directly related to the development of the MW allocation plan. Specifics are as follows:

- Task 2 Data Collection - \$3,809
- Task 3 Ceiling Price Recommendations - \$431
- Task 4 Regulatory Processes - \$84

SEA billed \$22,698 to OER under the Benefit Cost Analysis effort which were covered at OER's expense (also as a result of the timing of the procurement noted in PUC 1-1). As such, the combined expenses associated with the 2025 MW allocation plan development were at least \$27,023.

Regarding an itemization of the activities and expenses associated with the MW allocation plan in program year 2026, please see below for a sub-task level accounting of the total requested budget:

<b>Sub-Task</b>	<b>Budget</b>
Update interconnection spreadsheet with RIE data	\$1,732
Screen for competitiveness concerns	\$1,352
QC interconnection status, peripheral model, and competitiveness screening	\$1,743
Discuss initial capacity findings with OER and revise as needed	\$1,061
Update BCA model with 2026 PY inputs and MW allocations	\$3,475
QC BCA model and revise as needed	\$2,893
Incremental PPT Development for DG Board, including review/edits	\$7,035
Incremental direct and rebuttal testimony, including data requests	\$7,046

### **PUC 1-3**

**Is the information on which SEA is relying to estimate total capacity to be able to bid into annual Open Enrollments, as stated in Task 2, bullet point 1, the same information referenced on pages 39-40 of SEA's testimony in Docket No. 24-50-REG?**

Yes.

### **PUC 1-4**

**With reference to Task 3, could SEA refresh all inputs for the CREST model for \$19,778? If not, could it be done without increasing the overall cost of the contract?**

No, Task 3 was budgeted assuming a refresh of financing and tax related inputs only. These efforts include the development of additional stakeholder surveys, direct outreach to key market participants, the development of stakeholder meeting material, supporting desktop research,

modeling revisions to ceiling prices, and testimonial efforts. As such, SEA has communicated to OER that a full refresh of all inputs cannot be done at that cost.

OER notes, however, that Task 3 was budgeted at this lower level because it wishes not to change the capital and operating cost values assumed as part of the three-year program plan. This is because OER believes that maintaining these assumed inputs is important for maintaining clear thresholds for revisions to ceiling prices approved through a multi-year program plan. Thus, OER has directed SEA only to budget for revisions to financing and tax related assumptions.