Stephanie De La Rosa, Commission Clerk **August 6th, 2025**
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI, 02889

RE: Green Energy Consumers Alliance Comments on Docket No. 25-28-EL.

Dear Ms. De La Rosa,

Thank you for the opportunity to comment on Docket No. 25-28-EL: Notice for Comment on Options for Mitigating Winter Price Volatility for the Winter of 2025-2026. Green Energy Consumers Alliance is a nonprofit organization working in both Providence, Rhode Island and Boston, Massachusetts with a mission to empower consumers and communities to speed a just transition to a zero-carbon future. We respectfully submit the following comments.

Green Energy Consumers Alliance sees some merit to shifting the cost recovery period for certain rate components from twelve months to eight-months to reduce "rate shock" during winter season. However, before we endorse such a change, we would like to see an estimate of the cost to ratepayers of borrowing money to finance the deferral. We also want to emphasize that such deferrals would not reduce costs to ratepayers but simply shift costs away from the four winter months.

We also want to emphasize a point made in the Notice itself: the winter weather of 2024/2025 was a major factor in causing electricity bills to rise. This past winter was unusual and care should be taken before establishing a policy that would have seemed appropriate for just one winter out of many.

We also want to emphasize a point that was not made in the Notice, which is that rate and bill volatility are increasingly tied to the region's overdependence upon natural gas for power generation, especially in the winter. But this overdependence is also exhibited in spring and summer as well, as recently reported by ISO-NE in its Spring Market Report[1].

> "Energy costs totaled $1.26 billion, up 67% (or $500 million) from spring 2024 costs. The increase was driven by a 112% year-over-year rise in natural gas prices. Lower demand and an increase in net imports from New York partially offset the impact of higher natural gas prices."

[1] Internal Market Monitor releases spring 2025 quarterly report - ISO Newswire

Overdependence upon natural gas is a fact that can and must be addressed by a long-term, steady commitment to energy efficiency, renewable energy, and demand response.

In addition to rate reform measures that impact all ratepayers, Green Energy Consumers recommends the review and implementation of appliance-specific rates like seasonal heat pump rates and/or electric vehicle charging rates. There are other states in the New England region that have implemented or are developing technology specific rates that lower the customers' overall charge per kilowatt-hour. Massachusetts developed an Interagency Rates Working Group (IRWG) to advance near-and-long term ratemaking priorities in the Commonwealth to help the state decarbonize. For more information into the ratemaking strategies explored, and the implementation of seasonal heat pump rates, we refer you to the near-term IRWG recommendations[2] and the ratemaking report[3] prepared by Energy + Environmental Economics (E3).

Finally, we look forward to the September hearing on this matter. However, in advance of that hearing, we encourage the Commission to send out a more detailed memo to stakeholders regarding the ideas mentioned in the Notice and any new ideas that might stem from stakeholder comments.

Thank you for the opportunity to comment.

Sincerely,

Tina Munter, Rhode Island Policy Advocate
Tina@GreenEnergyConsumers.org
Green Energy Consumers Alliance

[2] Massachusetts Near Term Rate Strategy Recommendations
[3] Near-Term Rate Design to Align with the Commonwealth's Decarbonization Goals