



October 24, 2013

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Dear Commissioners:

This letter is in response to Docket 4404 – Commission Review into the Adequacy of Renewable Energy Supplies. The New England Clean Energy Council (NECEC) strongly urges the Commission to continue with the current RES compliance schedule and affirm Rhode Island’s commitment to growing the clean energy economy.

NECEC is a clean energy business association whose mission is to accelerate New England’s clean energy economy to global leadership by building an active community of stakeholders and a world-class cluster of clean energy companies. Council members span the broad spectrum of the clean energy industry, including energy efficiency, demand response, renewable energy, combined heat and power, energy storage, fuel cells and advanced and “smart” technologies. Our ranks also include venture investors, major financial institutions, universities, industry associations, utilities, labor and large commercial end-users. A cross-section of our members are operating and investing in Rhode Island and more are interested in doing so.

NECEC’s position on Docket 4404 is that any delay in the increase of the state’s Renewable Energy Standard (RES) would be a self-fulfilling prophecy. While the intended purpose of the RES is to stimulate the market for renewable energy, this delay would actually discourage development as it signals uncertainty about Rhode Island’s commitment to renewable energy.

As the Office of Energy Resources pointed out, National Grid’s Resource Adequacy Study indicates that if the current long-term contract projects are completed on schedule, they will be on target to meet the existing compliance schedule. If the projects are delayed, an Alternative Compliance Payment (ACP) may need to be made, but it is too early to tell. Moreover, the ACP was put in place for this type of scenario as insurance for customers against the utility needing to purchase RECs at too high of a price. The ACP is then reinvested in Rhode Island bringing forth more in-state renewable energy development and economic benefit.

With this in mind, NECEC encourages the Commission to continue Rhode Island’s commitment to renewable energy by maintaining the current RES compliance schedule. Thank you for taking the time to review these comments.

Sincerely,

A handwritten signature in blue ink that reads "CPennock".

Charity Pennock
RI State Coordinator

A handwritten signature in black ink that reads "Janet Gail Besser".

Janet Gail Besser
VP, Policy and Government Affairs