



Public Utilities Commission  
Attn. Cynthia Wilson-Frias  
89 Jefferson Blvd.  
Warwick, RI 02888

2/19/16

Dear Ms. Wilson-Frias,

I am writing on behalf of People's Power & Light (PP&L), a non-profit organization based in Providence dedicated to making energy affordable and environmentally sustainable. The following are comments regarding the scope of a potential docket to investigate the changing distribution system.

First, PP&L is appreciative of the Commission's interest in the questions posed in the February 5th memo to stakeholders. It is certainly time to review the system we now have in place with an eye towards changes that may happen in the next few years.

PP&L reserves the right to make more detailed comments if and when the docket is opened. But for now, we are prepared to say this:

- Pursuant to the Resilient Rhode Island Act, Rhode Island has established ambitious greenhouse gas reductions goals. The law sets an ultimate target of 80 percent reductions of greenhouse gas emissions at 1990 levels by 2050. By all accounts, the economics of reducing greenhouse gases are generally the best in the electricity sector. So GHG reduction benefits must be incorporated.
- Health benefits associated with reduced fossil fuel emissions should also be calculated and monetized.
- We are persuaded by recent studies by Synapse and The Analysis Group pointing to the economic advantages of meeting our energy needs through a combination of efficiency, demand response, targeted distributed generation, and clean energy supply procurement over approaches involving the procurement of more natural gas.
- The time for time varying rates has come. With today's technology and education, consumers can and will adapt well to price signals presented in a user-friendly manner. The PUC needs to point National Grid in that direction. This should begin with a thorough analysis of total benefits and costs.
- Like every other state in the country, Rhode Island is moving too slowly on electric vehicles (EVs). The economic and environmental benefits of electrifying vehicles are enormous. Rhode Island's State Energy Plan references EVs among key tools to develop renewable energy markets. And we certainly expect that the Executive Climate Change Coordinating Council (EC4) will also recommend a major effort to incentivize EV adoption as a strategy to reduce emissions and climate change impacts. Without a doubt, this means a central role for National Grid, perhaps in the form of charging stations and/or special rates for EV owners. EVs truly represent a win-win opportunity for consumers and for National Grid. Again, this calls for a thorough analysis of total benefits and costs.

Thank you for the opportunity to participate and your consideration of our comments. We recognize that there are many opportunities to explore, but we hope that the scope of the docket will include the suggested topics above.

Sincerely,



Larry Chretien  
Executive Director



Kat Burnham  
Program Coordinator