



20 July 2018

VIA FIRST CLASS MAIL & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 4822: Solicitation of Long-Term Contracts for Renewable Energy and Renewable Energy Certificates ("RECs"), Pursuant to R.I. Gen. Laws § 39-26.1-1 *et seq.*

Dear Ms. Massaro:

EDP Renewables (EDPR) offers this comment in response to the July 9, 2018 filing by The Narragansett Electric Company d/b/a National Grid ("National Grid" or "Company") in this docket.

In that filing, responding to a joint memorandum prepared by the Office of Energy Resources ("OER") and the Rhode Island Division of Public Utilities and Carriers (the "Division") on the Company's draft RFP (the "Joint Memo"), National Grid proposed an individual project contract cap of 200 MW.

We appreciate the general desire to strike "a reasonable balance between the competing objectives of considering a sizeable, but not overly large, amount of renewable energy and RECs now" and the specific concern that if "the Company receives one or more attractive bids from large projects, selecting those projects may foreclose the opportunity to select attractive smaller projects, which may also provide some resource diversity benefits" (National Grid July 9 filing at 3).

However, we strongly suggest that a hard cap on individual project size runs the risk of arbitrarily disqualifying a project that could best address the goals of this procurement. Specifically, we ask that the per-project parameter be adjusted to reflect the specific recommendations of the Joint Memo. The Joint Memo suggests a 200 to 300 MW per project parameter, while the Company has solely embraced the lower end of that range by proposing a hard cap of 200 MW per project. At the very least, the per-project size parameter should be a flexible target (like the 400 MW overall goal for the procurement) and not an inflexible cap.

EDPR notes, in the interest of transparency and to illustrate an unintended effect of this proposal, that our Number Nine Wind Farm project (ISO-NE Queue Position 417), the most mature large scale renewable energy project in New England, has full interconnection rights for 250 MW. The ability of that project to provide the best and lowest price to Rhode Island depends on the ability of the project to fully utilize those rights.

Revising the per project cap to 250 MW, or a range that includes 250 MW, would be fully consistent with the recommendations of OER and the Division in the Joint Memo and would not frustrate the intention of OER, the Division and the Company to not "foreclose the opportunity to select attractive smaller projects, which may also provide some resource diversity benefits."



Thank you for the opportunity to submit this comment and make this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ryan J. Brown", with a long horizontal flourish extending to the right.

Ryan Brown
Executive Vice President,
Eastern Region and Canada