



For a thriving New England

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April 5, 2019

By First Class Mail and Electronic Mail

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

Re: Docket 4929 - The Narragansett Electric Co. d/b/a National Grid - Review of Power Purchase Agreements (PPA) Pursuant to R.I. Gen. Laws 39-31-1 *et seq.*

Dear Ms. Massaro:

For filing in the above-referenced docket enclosed please find the comments of Conservation Law Foundation.

Thank you for your attention to this matter.

Sincerely,

JAMES CROWLEY
Staff Attorney
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cc: Docket 4929 Service List (*via electronic mail*)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

In re: The Narragansett Electric Co. d/b/a National Grid -
Review of Power Purchase Agreements (PPA) Pursuant to
R.I. Gen. Laws 39-31-1 et seq.

Docket 4929

COMMENTS OF CONSERVATION LAW FOUNDATION

Conservation Law Foundation (“CLF”) appreciates this opportunity to provide comment to the Public Utilities Commission (the “Commission”) on its review under the Rhode Island Affordable Clean Energy Security Act, R.I. Gen. Laws § 39-31 (“ACES”) of a 20-year Power Purchase Agreement (“PPA”) between Narragansett Electric Co. d/b/a National Grid (“National Grid”) and DWW Rev I, LLC (“DWW”) for the purchase of energy and renewable energy certificates (“RECs”) from DWW’s 400-megawatt (“MW”) Revolution Wind Farm offshore wind energy facility (the “Facility”).

CLF is a nonprofit, member-supported advocacy organization that works to solve the environmental problems that threaten the people, natural resources, and communities of New England. CLF has a decades-long record of advocacy in support of clean and efficient energy production in New England. CLF’s advocates have deep expertise in renewable energy law and policy as well as mitigation of the environmental impacts of renewable energy development. CLF and its members have a strong interest in promoting procurements of clean, renewable energy that maximize greenhouse gas (“GHG”) emissions reductions at the best price for Rhode Island electricity consumers.

Clean energy procurements, including those authorized under ACES, are a key mechanism for achieving the GHG emissions reduction goals of the Resilient Rhode Island Act¹ and advancing Governor Gina M. Raimondo’s goal of facilitating the development of 1,000 MW of clean energy resources by 2020.² This procurement represents a major step towards achieving that goal, and would more than double the State’s clean energy portfolio.³ The Department of Environmental Management (“DEM”) estimates that over the life of the PPA, the energy generated by the Facility would replace approximately 13,960 gigawatt hours (“GWh”) of fossil fuel generation, and reduce regional CO2 emissions by at least 6,738,480 metric tons.⁴ Electricity consumption is a major contributor to Rhode Island’s GHG emissions,⁵ so it is vital that the State take bold and aggressive action to transition to clean energy resources as soon as possible.

The proposed contract pricing compares favorably to other renewable energy contracts recently approved by the Commission,⁶ providing the State with large-scale renewable energy producing no direct greenhouse gas emissions at a fixed purchase price—inclusive of RECs—of 9.8 cents per kilowatt hour (“kWh”) over twenty years. The contract is projected to reduce electricity bills

¹ The Resilient Rhode Island Act targets GHG emissions reductions of 45% below 1990 levels by 2035 and 80% below 1990 levels by 2050. The most recent analysis from the Intergovernmental Panel on Climate Change indicates that even more ambitious targets are necessary to avoid warming beyond 1.5°C, calling for net zero emissions by 2050. *See* Intergovernmental Panel on Climate Change, *Global Warming of 1.5°C: Summary for Policymakers* (2018), available at https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf.

² *See* Governor Gina M. Raimondo Press Release of February 5, 2018, “Raimondo Touts Goal to Make Energy System 10 Times Cleaner: Directs State Energy Team to Work with Utilities to Procure 400MW of Affordable, Clean Energy,” available at: <http://www.ri.gov/press/view/32439>.

³ *See* *Governor’s 1,000 by ’20 Clean Energy Goal*, R.I. Office of Energy Res., <http://www.energy.ri.gov/renewable-energy/governor-clean-energy-goal.php> (last visited Apr. 5, 2019).

⁴ DEM Advisory Opinion at 5.

⁵ *See* R.I. Exec. Climate Change Coordinating Council, *Rhode Island Greenhouse Gas Emissions Reduction Plan 8* (2016), available at <http://climatechange.ri.gov/documents/ec4-ghg-emissions-reduction-plan-final-draft-2016-12-29-clean.pdf>.

⁶ OER Advisory Opinion at 18.

and provide over \$1 billion in total net benefits to Rhode Island ratepayers.⁷ Aside from utility savings, the project would also promote economic growth by creating upwards of 800 construction and 50 permanent jobs and spurring local investment.⁸ Furthermore, successful, thoughtful procurements have the potential to cultivate support for clean energy and send the necessary market signals to strengthen a sustained and vibrant renewable energy industry, which in turn has the potential to generate continuing economic and environmental benefits for Rhode Island.

CLF enthusiastically supports the utilization of clean energy resources to reduce greenhouse gas emissions and other air pollution, and to help reach Governor Raimondo's goal of facilitating the development of 1,000 MW of clean energy resources by 2020. This project and its PPA represent a chance to take a significant step forward in the State's transition to clean, renewable sources of electricity. That transition must accelerate if we are to meet our responsibility to cut carbon pollution and help prevent the worst impacts of climate change. Thank you for the opportunity to comment.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

By its attorney,



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Dated: April 5, 2019

⁷ OER Advisory Opinion at 4.

⁸ *Id.*