



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

Clerk Massaro,

The purpose of this letter is to provide support to the Episcopal Diocese of Rhode Island's Petition for a Declaratory Judgment in Docket 4981. Green Development, LLC ("Green") develops, installs, and operates distributed renewable energy projects in Rhode Island. Green currently has 53MW in its operational portfolio and another 200MW in the pipeline. Most of our pipeline projects are currently stalled in transmission study.

The renewable energy industry was blindsided in early 2019 with new forms of interconnection delays, including but not limited to "transmission system impact studies". Projects that should and did receive an Interconnection Services Agreement ("ISA") within 4-5 months now take 12-18 months to reach ISA. System Impact Studies are clearly due to interconnecting customers within 90 days as stated under RIGL § 39-26.3-3; and ISAs are due no later than 270 calendar days, or 360 is substation work is necessary under the same statute section.

The entire industry including job growth, clean energy production, and the Governor's renewable energy goals are currently at a standstill. Even worse is the fact that when the 12+month transmission studies are complete, the projects will be expected to tolerate additional and unpredictable fees to upgrade the transmission system. Transmission system upgrades are decidedly not the responsibility of distribution generation customers under R.I. Gen. Laws § 39-26.3-4 and 18 CFR § 292.306.

The delays and fees being imposed on renewable energy projects by transmission are devastating, unprecedented, and unauthorized. Green strongly encourages the PUC to issue a Declaratory Judgment sought by the Episcopal Diocese of Rhode Island. Thank you for the opportunity to provide comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hannah Morini", is written over a light blue horizontal line.

Hannah Morini
Director of Business Development