



Via Email

December 17, 2020

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

Re: Docket No. 5088 - Renewable Energy Growth (RE Growth) Program Year 2021 submitted by the Rhode Island Distributed Generation Board's (DG Board) and the Narragansett Electric Co. d/b/a National Grid

Dear Ms. Massaro,

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to provide comment to the Rhode Island Public Utilities Commission (“PUC”) in Docket No. 5088 regarding the 2021 program year of the Renewable Energy Growth (“RE Growth”) Program.

NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

NECEC strongly supports the goals and intent of the RE Growth Program which has helped accelerate the deployment of renewable energy across Rhode Island and which will be instrumental in ensuring that Rhode Island residents reap the local economic benefits in connection with Governor Raimondo’s 100% Renewable Executive Order. As such, NECEC supports the Recommendations for the 2021 RE Growth Program Year submitted by the Distributed Generation Board and the Office of Energy Resources on November 17, 2020.

The 2021 RE Growth Program filing includes adders for two types of projects: solar carports and low-income Community Remote Distributed Generation (“CRDG”). NECEC supports the continuation of the Solar Carport Adder, and the introduction of the Low-Income CRDG Adder. Adders have successfully been applied to solar programs in New England, particularly in the Massachusetts SMART Program. Adders work well to signal to developers that certain types of development provide a public policy value to the state and its residents.

NECEC supports the recommendation to continue the Solar Carport Adder Pilot. As evidenced by the selection of multiple carport projects in the 2020 REG Program year, the Solar Carport Adder is driving the desired development. We appreciate that the recommendation to retain the Solar Carport Adder recognizes that these projects almost always require more complex engineering and construction considerations when compared to rooftop or ground-mounted projects, and, consequently, are typically more expensive to build. Providing an additional incentive for solar canopies indicates that Rhode Island supports a broad set of solar solutions and will help the solar industry and their customers overcome the additional labor and material costs, helping to ensure that these projects can be built. In future program years, we encourage a mechanism to stabilize the value of the Solar Carport Adder to provide predictable incentives to develop these often multi-year projects.

NECEC also supports the proposed Low-Income CRDG Adder. As Rhode Island transitions to a fully renewable electric system, it is imperative that Rhode Island residents of *all* backgrounds receive the benefits of local renewable energy. The introduction of an adder for low-income CRDG projects is an important step towards ensuring that the RE Growth Program promotes equitable outcomes. We expect that the experience gained through the implementation Low-Income CRDG Adder will support the development of a low-income adder for all project types in future program years.

We appreciate the efforts of the Distributed Generation Board and the Office of Energy Resources to develop the recommendations and urge the Commission to adopt a 2021 RE Growth Program that incorporates a continuation of the Solar Carport Adder and an introduction of the Low-Income CRDG Adder.

Sincerely,



Jeremy McDiarmid
Vice President, Policy & Government Affairs



Sean Burke
Policy Associate

cc: Chris Kearns, Office of Energy Resources