



January 18, 2022

**RI-NE4OSW Partners:**

Acadia Center  
BlueGreen Alliance  
Clean Water Action  
Environment America  
Green Energy Consumers Alliance  
League of Conservation Voters  
National Wildlife Federation  
NASRCC (Carpenters)  
PowerOptions  
Second Nature

**RI-NE4OSW Endorsers:**

Amalgamated Bank  
Eastern Bank  
Environmental Council of Rhode Island  
Flashover LLC  
Greenwater Marine Sciences Offshore  
Mugventures  
Skunk Works Fund

**Allies:**

Audubon Society of RI  
Climate and Development Lab, Brown University

To the Division of Public Utilities and Carriers,

The undersigned organizations respectfully submit brief comments for consideration on the subject of a transfer of National Grid's Rhode Island gas and electric businesses to PPL. New England for Offshore Wind is a broad-based coalition of environmental, academic, labor, business, and social justice organizations united by our vision to combat climate change by increasing the supply of clean energy to our regional grid through responsibly developed offshore wind.

Rhode Island cannot afford to delay offshore wind development. The climate crisis is already impacting our communities, environment, and economy. As the 100% Renewable Electricity Report demonstrated, the rapid deployment of offshore wind is one of the least-cost, most straightforward steps to reduce electricity sector emissions in our state. It will be nearly impossible to meet our Act On Climate goals without an urgent and unprecedented ramp up in offshore wind generation for our state.

Unfortunately, the proposed utility sale to PPL has already resulted in a delay. In 2020, Governor Raimondo promised that RI would procure 600 MW of offshore wind, but the sale proceeding has evidently postponed that RFP for more than a year. As you deliberate in the final months of this proceeding, we urge you to consider the following comments so as to avoid even more damage to our burgeoning offshore wind industry:

- 1) Has PPL demonstrated that it can fulfill long-term contracting requirements and develop offshore wind contracts at least as well as National Grid at no additional cost to ratepayers? The Division should consider PPL's lack of experience with offshore wind contracting as well as the loss of shared resources with National Grid's Massachusetts business, which has and will continue to conduct much larger offshore wind procurements.
- 2) Has PPL demonstrated that it will support—or at least not oppose—policy, legislation, and regulation to accelerate offshore wind development in Rhode Island?
- 3) Has the Division sufficiently taken into account in its deliberations the Act On Climate's mandatory carbon emissions reductions goals?

We are at a pivotal point in our transition to a clean energy system and a strong offshore wind industry in our state. We hope that this transaction does not result in any more delays.

Sincerely,

Susannah Hatch  
*Regional Lead, New England for Offshore Wind*