

CLEAN WATER ACTION

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

Re: Docket 3659, Proposed Regulations Governing the Implementation of a Renewable Energy Standard (RES) - Comments of the State Energy Office

October 20, 2005

Dear Ms. Massaro,

Enclosed are the comments from Clean Water Action regarding the Renewable Energy Standard Rulemaking process. Clean Water Action is a grassroots environmental organization with over 10,000 members in Rhode Island.

A year and a half ago, Clean Water Action gave testimony supporting the passage of the Renewable Energy Standards Act of 2003 (H 7375). I am pleased to commend the Public Utility Commission of Rhode Island for drafting the rules to enforce the RES Act.

By making the shift to clean, renewable energy, Rhode Island is joining the leadership of states that have a hopeful vision for the future of our environment. Clean, renewable energy is a vision in which the threat of global warming can be stopped, in which our clean air and water can be protected from pollution, and in which our wild heritage can be protected from drilling and mining.

Before I worked for Clean Water Action, I worked on a campaign to stop oil and gas drilling on our national parks, forests and wildlife refuges. Always, the solution was for America to shift to clean renewable energy. I'm happy to be supporting that solution.

America's dependence on fossil fuels not only affects our beautiful legacy of wildlands. It also hurts our air and water quality. Everyone is familiar with the oil and gas spills along our coasts and waterways. Everyone has heard stories about how mining for coal pollutes our mountain streams (and indeed removes mountains altogether).

And everyone, everyday is confronted with our air quality when fossil fuels are burned to create energy. Asthma becomes a more and more common health threat among Rhode Islanders, especially those living in areas where pollution from burning fossil fuels is high.

And burning fossil fuels for energy is the leading cause of global climate change. Here in Rhode Island, our way of life is threatened by climate change. Rising sea levels threaten our beaches and the tourism they bring. Hotter days mean more ground-level ozone pollution which threatens the health of tens of thousands of Rhode Islanders suffering from asthma. Climate change also damages our native forests and key agricultural crops, like cranberries, maple syrup, and corn.

There are three points that Clean Water Action would like to see resolved in the final rules:

1. Clean Water Action supports National Grid's opposition to the itemization of compliance costs on customer bills (Section 8.4). By itemizing compliance with the RES Act we are sending the wrong message to consumers that clean, renewable energy costs money without acknowledging the long-term costs of not shifting to renewable energy. Asthma and other respiratory diseases cost money and lives. Destruction of open spaces for drilling and mining costs money. Global warming will cost us money. Accordingly, Clean Water Action requests a change to Section 8.4.
2. Clean Water Action is also concerned about the requirement for the entry of Generation Information System (GIS) Certificates to be verified by an independent, third party after they have been entered into the GIS system. A better scenario would be for that independent, third party to actually enter the GIS Certificates. While we understand that the system infrastructure is not there yet, Clean Water Action supports the idea and would like to see the system improved for this solution.
3. Clean Water Action is concerned that little attention in the RES Rules is given to reducing Greenhouse Gases from the electricity sector. Our organization has been following the Regional Greenhouse Gas Initiative and its model rule process. The PUC can expect that Clean Water Action will continue to push for real, quantifiable reductions in greenhouse gases from power plants either through the RES or through RGGI.

Aside from these three concerns, Clean Water Action is happy and proud to commend Rhode Island's Public Utilities Commission for drafting these rules to put our state's Renewable Energy Standards into effect. Thank you for opportunity to submit comments regarding the Renewable Energy Standards.

Sincerely,

Chris Wilhite
Climate Campaign Organizer
Clean Water Action
741 Westminster St.
Providence, RI 02903