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

Dear Ms. Massaro and Commissioners:

Thank you for considering the following comments on the proposed Distributed Generation Long Term Contracts - Rhode Island Public Utilities Commission Docket No. 4288.

Like others who have submitted comments, I agree that the revisions made to the contract represent improvements over previous versions. But I feel compelled to point out that other states have developed significantly simpler and less onerous contract solutions to very similar policy objectives.

While this contract may work for wholesale energy project developers doing relatively large projects, it includes unnecessary barriers to be appropriate for smaller projects for owners who are not full time energy industry professionals and thus shifts available resources toward larger projects. The enabling legislation was intended to serve typical distributed generation clients who own a store, non-profit, school or factory and want to install wind or solar without necessarily dedicating staff burdens to learning the arcane details of wholesale energy markets. The more perceived risk to sellers and their finance partners in the contract document, the higher the cost of these contracts will be for ratepayers.

The legislation indicates that the contract working group shall work in good faith to develop standard contracts that would be applicable for various technologies for both small and large distributed generation projects that take into account the size of each project and the technology. While it will be good to get the effort started with the contract under consideration, I hope that the Commission will empower and instruct the new Distributed Generation Standard Contract Board to come back to the Commission next year with a more simple and elegant solution for a contract that better addresses the needs of smaller distributed generation projects.

Thank you for considering my comments in this proceeding

Fred Unger
President
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