

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Co. d/b/a National Grid - Solicitations of Long-Term Contracts for Renewable Energy and Renewable Energy Certificates (RECs), Pursuant to R.I. Gen. Laws § 39-26.1-1 et seq.

Docket No. 4822

COMMENTS OF BROOKFIELD RENEWABLE

Brookfield Renewable strongly supports Governor Raimondo’s commitment to expand Rhode Island’s utilization of renewable energy resources, as well as solicitations such as the Draft RFP which support this goal. However, Brookfield Renewable believes Rhode Island would benefit considerably by issuing a final RFP that allows eligibility for a broader fleet of renewable energy resources than currently contemplated in the Draft RFP.

Section 2.2.2.2 of the Draft RFP limits an Eligible Facility to a resource which meets the following standards:

- “a. The electric generation facility must qualify as an eligible renewable energy resource as defined R.I. Gen. Laws § 39-26.1-2(4), § 39-26-5 and Section 3.16 of the Regulations; and
- b. The facility must qualify as a “newly developed renewable energy resource,” as defined in R.I. Gen. Laws § 39-26.1-2(6). As of the date of contract signing, the generation unit(s) must not have begun operation, and the developers must not have implemented investment or lending arrangements to finance construction.”

In order to maximize resource optionality and reduce costs for Rhode Island ratepayers, Brookfield Renewable urges the Commission to leverage its existing procurement authority

outside of R.I. Gen. Laws § 39-26.1-1 et seq.¹ to enable participation of any renewable resource currently eligible under the state’s Renewable Energy Standard (RES), including existing hydropower facilities sized 30 MW or less regardless of vintage, in addition to newly developed resources. There are several ways of incorporating existing small-scale hydropower in a manner consistent with the Draft RFP’s goal of procuring incremental renewable energy, including enabling eligibility of i) existing small-scale hydropower facilities which have not delivered to ISO New England in the last three years or longer and ii) existing small-scale hydropower resources that are “blended” with newly developed RES-eligible resources to provide a firm, 100% renewable clean energy product.

Importantly, by including eligibility for any existing small-scale hydropower facility not currently delivering to ISO New England, the RFP would support the goal of procuring incremental renewable energy for Rhode Island ratepayers and would also facilitate incremental reductions to Rhode Island’s greenhouse gas emissions. These renewable energy and carbon reduction benefits are equivalent to the deployment of new renewable resources. In addition, inclusion of existing small-scale hydropower in the Final RFP will enable Rhode Island to immediately realize the benefits of incremental renewable supply. Perhaps most importantly, expanding eligibility will increase competition in the RFP, thereby helping deliver least cost solutions for Rhode Island ratepayers.

Separately, enabling eligibility of existing hydro resources “blended” with new RES-eligible wind or solar will not only provide a firm, 100% renewable clean energy product, it would also offer significant economic and system reliability benefits that should be considered as part of this RFP and future procurements. By delivering renewable, carbon-free energy to firm intermittent supply, a blended product ensures that contracted generation is available during times of peak demand. This can mitigate exposure to price volatility and increased regional carbon emissions that frequently occur during winter peak hours, such as the cold snap from late December 2017 through early January 2018. During this period, weather conditions placed significant stress on the electricity grid and strained fuel availability, requiring the burning of over 2 million barrels of oil across the ISO New England footprint. In addition, by optimizing existing hydropower to firm intermittent resources, the RFP would promote more diverse

¹ For example, the *Affordable Clean Energy Security Act* (R.I. Gen. Laws § 39-26.1-1 et seq.).

CERTIFICATE OF SERVICE

I certify that on June 7, 2018, I sent the original and nine hard photocopies of this *Motion to Intervene and Comments* via United States mail to the Clerk of the Public Utilities Commission, 89 Jefferson Blvd., Warwick, RI 02888. In addition, an electronic copy has been delivered via email to the official service for Docket 4822.

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