



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF LEGAL SERVICES
One Capitol Hill, 4th Floor
Providence, RI 02908-5890

Tel: (401) 222-8880
Fax: (401) 222-8244

November 15, 2019

SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

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

Re: Docket #4982 - Petition of the Episcopal Diocese of Rhode Island for Declaratory Judgment on Rhode Island General Laws § 39-26.4 The Net Metering Act

Dear Ms. Massaro:

Enclosed for filing on behalf of the Rhode Island Office of Energy Resources ("OER") is an original and nine (9) copies of the Office of Energy Resources ("OER") comments regarding the Episcopal Diocese of Rhode Island's Petition for Declaratory Judgment (the Petition) on The Net Metering Act, as filed on October 11, 2019.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

c. Docket 4982 Service List

Rhode Island Office of Energy Resources
One Capitol Hill, 4th Floor
Providence, RI 02908



STATE OF RHODE ISLAND
**OFFICE OF
ENERGY RESOURCES**
Commissioner Carol J. Grant

November 15, 2019

Chairperson Margaret E. Curran
Commissioner Marion Gold
Commissioner Abigail Anthony
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket #4982 – Petition of the Episcopal Diocese of Rhode Island for Declaratory Judgment on Rhode Island General Laws § 39-26.4 The Net Metering Act

Dear Commissioners:

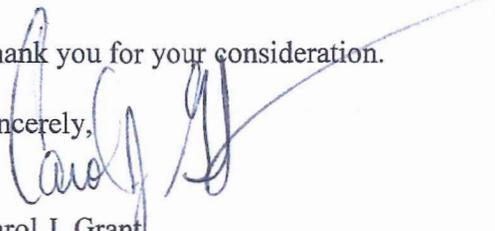
The Rhode Island Office of Energy Resources (OER) submits these comments regarding the Episcopal Diocese of Rhode Island's Petition for Declaratory Judgment (the Petition) on The Net Metering Act, as filed on October 11, 2019. OER supports the qualification of the Petitioner's renewable energy generation project, with capacity in excess of 25 kW and paired with battery storage, as an Eligible Net Metering System under R.I.G.L. § 39-26.4-2(5) to receive the full net-metering credit.

OER supports integrating energy storage with solar PV systems, regardless of solar PV system capacity. With proper electrical integration, energy storage can enhance the benefits of distributed generation like solar PV. The benefits can accrue to customers and society, and energy storage technology is an important tool in the long-term health of a modern power system.

Advances in battery technology and falling prices are increasingly making energy storage a viable solution in the market. The use of energy storage has great potential to bring substantial and diverse benefits to customers, the electric system, and society. These benefits include, but are not limited to, increasing system efficiency, reducing energy and system costs, reducing customer bills, integrating clean energy into the system, and increasing resiliency of the grid. Therefore, OER supports efforts to reduce barriers to storage deployment in Rhode Island and advance prudent policy measures to promote this technology in a thoughtful, cost-effective manner.

Thank you for your consideration.

Sincerely,


Carol J. Grant
Commissioner