

**Via Email**

December 6, 2019

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

**Re: Docket No. 4983 - The RI Distributed Generation Board's (DG Board) Report and Recommendations Relating to the 2020 Renewable Energy Growth Classes, Ceiling Prices, and Capacity Targets**

Dear Ms. Massaro,

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to provide comment to the Rhode Island Public Utilities Commission (“PUC”) in Docket No. 4983 regarding the 2020 program year of the Renewable Energy Growth (“RE Growth”) Program.

NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

As a general matter, NECEC supports the goals and intent of the RE Growth program which has helped accelerate the deployment of renewable energy across Rhode Island. By providing consumers and renewable energy developers with clear and predictable process, the RE Growth program reduces some of the uncertainty around project development while making project economics more predictable for all stakeholders.

More specifically, NECEC supports the Recommendations for the 2020 RE Growth Program Year submitted by the Distributed Generation Board and the Office of Energy Resources on October 22, 2019. We are particularly supportive of the recommendation to add a Solar Carport Adder of \$0.06/kWh to the Commercial and Large Solar classes.<sup>1</sup> At \$0.06/kWh, the proposed adder is consistent with the initial Solar Canopy adder in the Massachusetts SMART program. Solar carport projects take advantage of the footprint of an existing built environment and provide benefits to the parking lot users through weather protection. However, because Solar Carports almost always require additional construction when compared to rooftop or ground-mounted projects, they are typically more expensive to build. Providing an additional incentive for solar parking canopies indicates that Rhode Island supports a broad set

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<sup>1</sup> We note that National Grid, in its November 15, 2019 filing, “National Grid’s Proposed 2020 Renewable Energy Growth Program Tariff and Rule Changes” incorporates the Solar Carport Adder concept.

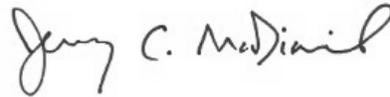
of solar solutions and will help the solar industry and their customers overcome the additional labor and material costs, helping to ensure that these projects can be built.

We appreciate the efforts of the Distributed Generation Board and the Office of Energy Resources to develop the recommendations and urge the Commission to adopt a final RE Growth program that incorporates a Solar Carport incentive.

Sincerely,



Peter Rothstein  
President



Jeremy McDiarmid  
Vice President, Policy and Government Affairs

cc: Carol Grant, Commissioner of Energy Resources  
Sean Burke, NECEC