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February 5, 2021

SENT VIA ELECTRONIC MAIL ONLY [Luly.Massaro@puc.ri.gov]:

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

RE: OER's Responses to the Commission's Record Requests (Response Dated February 5, 2021) (Docket No. 5088)

Dear Ms. Massaro:

Enclosed for filing on behalf of the Office of Energy Resources ("OER") are:

- An electronic copy of OER's responses to the Commission's Records Requests (Responses Dated February 5, 2021) (Docket No. 5088)
- An electronic copy of two updated PowerPoint slides from the August 28, 2020 SEA presentation (Slides 17 and 21) which have been updated to provide the cost analysis for ground mounted CRDG, as requested.

If there are any questions, please feel free to contact me.

Sincerely,

Albert J. Vitali III, Esq.

AJV/njr

Enclosure

c. Docket List: 5088

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: 2021 RENEWABLE ENERGY GROWTH	**:**	
PROGRAM: CLASSES, CEILING PRICES, AND	**:**	
CAPACITY TARGETS AND 2021 RENEWABLE	**:**	**DOCKET NO. 5088**
ENERGY GROWTH PROGRAM – TARIFFS AND	**:**	
SOLICITATION AND ENROLLMENT PROCESS RULES	**:**	

Record Requests
(Responses Dated February 5th, 2021)

RR-1 (OER) – Please add a row to slides 17 and 21 of the August 28, 2020 SEA presentation to provide the cost analysis for ground mounted CRDG.

Attached are the updated slides from the presentation.

Respondent: Jim Kennerly, SEA

RR-2 (OER) – Was the approved amount for 2020 Quality Assurance work transferred from National Grid to OER in 2020?

The Office of Energy Resources submitted an invoice payment of $146,400 to National Grid for the 2020 Quality Assurance Study and Report. The funds for the study were transmitted to OER. As of February 1, 2021, OER has paid $7,627.00 to the consultant, Natural Power.

Respondent: Chris Kearns, OER

RR-4 (OER) – The Chairman advised OER of some of his concerns with the continuation of the carport adder during the hearing on January 27, 2021. He asked OER for a response. OER took this as a record request.

As we understand his remarks, the Chairman expressed concern that the construction of any given solar carport does not prevent a separate solar project being built in another environment. The Chairman indicated that, therefore, consumers would pay additional costs for the carport without having prevented the development of that other solar project.

OER does not agree with that assessment. State policy supports market opportunity for a variety of renewable resource types in such a way that reduces environmental impact and does not specifically limit development to a given location or project type. Programmatic and regulatory actions should reflect that approach. In this instance, the Parties seek – on a pilot basis – to spark

market opportunity for alternatives to ground mounted solar, and to study and reflect on the results. This is not dissimilar to efforts elsewhere in the state, as described below. Without such opportunities, it is possible that the state may never host any solar projects other than ground and roof mounted solar, which could hinder the state's efforts to reach its greenhouse gas reduction and renewable energy goals. Therefore, in the near term, these three locational methods of solar development - roof, ground mount, and carports - can and should co-exist. It is not "one or the other," just as the state is not pursuing *just* solar or *just* offshore wind to achieve its array of energy, economic, and environmental policy objectives.

To meet our greenhouse gas reduction and renewable energy goals, Rhode Island will require a very large quantity of renewable resources across a variety of siting locations to effectively decarbonize the economy while simultaneously mitigating broader environmental impacts. It is in the state's interest to support stable market development of more environmentally-sensitive solutions today without eliminating other clean energy opportunities. Furthermore, OER believes that the REG program – which relies significantly on competitive procurements as a means to reduce its cost to ratepayers – provides a compelling platform for pursuing these solutions at a reasonable cost to ratepayers.

The proposed REG carport adder is not proposed in isolation. It is one of several initiatives across the policy and programmatic landscape supporting clean energy development in/on less sensitive environments, with a mix of ratepayer and other funds. In addition to the ongoing Carport Solar adder pilot, OER has supported the following:

- Investment of state funds in solar brownfield and carport incentives through Commerce RI's Renewable Energy Fund (REF).

- Technical assistance provided to eligible virtual net metering (VNM) customers that encourages public entities to focus project selection criteria on disturbed areas and commercial/industrial zoned lots, while avoiding undeveloped residential lots.

- Issuance of the Statewide Solar Siting Opportunities Report, which leveraged available municipal GIS mapping and other data to examine the technical and economic potential of solar in less sensitive environments, including parking lots. The Report found that there is substantial technical potential for solar sited on previously disturbed sites, including over 1 GW on parking lots. These findings emphasize that parking lots and disturbed sites represent a valuable resource for meeting state renewable energy goals with lower environmental impacts and reduced community concerns.

- Support for robust deployment of cost-effective energy efficiency and demand response measures that ultimately reduce demand that would otherwise need to be served by renewables in a decarbonized future.

Given that growth in distributed generation increases pressure on both land use and system integration costs, there is value in pursuing mechanisms that encourage projects that both minimize development on undeveloped residential lots or in environmentally sensitive areas and

are less costly to interconnect to the system. Initial limited results of the carport pilot program suggest the solar carport adder has potential to advance these objectives.

OER maintains that the continuation of the REG carport pilot for a 2nd year is an important, limited, and complementary market opportunity for renewable development on less-sensitive environments. Also, as designed, it enables thoughtful evaluation of the pilot results and impacts through an annual regulatory review with the agencies and stakeholders, which stands in contrast to other potential enabling mechanisms that may mandate such programs with little flexibility to evaluate the results and adjust based on the information gathered through a pilot program.

Respondent: Chris Kearns, OER