

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

The Narragansett Electric Company  
d/b/a National Grid

Docket No. 5202

RE: 2022 Renewable Energy Growth  
Program

**PREFILED DIRECT TESTIMONY OF**

**Michael W. Brennan, Consultant  
Gregory L. Booth, PLLC  
On Behalf of Rhode Island Division of Public Utilities and Carriers**

January 25, 2022

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**Table of Contents**

| <b><u>Section</u></b> | <b><u>Description</u></b>               | <b><u>Page Nos.</u></b> |
|-----------------------|---|-------------------------|
| <b>I.</b>             | <b>Introduction</b>                     | <b>1-2</b>              |
| <b>II.</b>            | <b>Purpose of Testimony</b>             | <b>3</b>                |
| <b>III.</b>           | <b>Ceiling Price Recommendations</b>    | <b>3-10</b>             |
| <b>IV.</b>            | <b>Competitiveness of Solicitations</b> | <b>11-18</b>            |
| <b>V.</b>             | <b>Conclusion</b>                       | <b>19</b>               |
| <b>Exhibits</b>       | <b>MWB-1    Resume</b>                  |                         |

**DIRECT TESTIMONY OF MICHAEL W. BRENNAN**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND THE BUSINESS ADDRESS OF YOUR**  
3 **EMPLOYER.**

4 A. My name is Michael W Brennan. I am engaged by Gregory L. Booth, PLLC ("Booth,  
5 PLLC"), mailing address 14460 Falls of Neuse Road, Suite 149-110, Raleigh, North  
6 Carolina 27614.

7 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS MATTER?**

8 A. I am testifying on behalf of the Rhode Island Division of Public Utilities and Carriers  
9 ("Division").

10 **Q. WOULD YOU PLEASE OUTLINE YOUR EDUCATIONAL BACKGROUND?**

11 A. I graduated from North Carolina State University in Raleigh, North Carolina in 1992 with  
12 a Bachelor of Science Degree in Civil Engineering and received a Master's in Business  
13 Administration from Wake Forest University in 2000.

14 **Q. PLEASE BRIEFLY DESCRIBE YOUR EXPERIENCE WITH ELECTRIC**  
15 **UTILITIES.**

16 A. I have worked in the electric utility industry since 2000. I was employed by Progress  
17 Energy from 2000 to 2012 and Duke Energy from 2017 to 2019 in a multitude of positions.  
18 Attached is my Curriculum Vitae Exhibit MWB-1. I have been actively involved in all  
19 aspects of electric utility strategic and financial planning, utility investment analysis, public  
20 policy, ratemaking, and renewable energy program management. I also have experience  
21 advising clients on energy markets and renewable energy project development.

22 **Q. HAVE YOU PREVIOUSLY TESTIFIED AS AN EXPERT BEFORE THE RHODE**  
23 **ISLAND PUBLIC UTILITIES COMMISSION?**

1 A. Yes, I testified in Docket 5088 in 2021.

2 **Q. HAVE YOU PREVIOUSLY TESTIFIED AS AN EXPERT IN OTHER**  
3 **JURISDICTIONS?**

4 A. No.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

3 A. The purpose of my testimony is to provide observations and recommendations on the  
4 following key elements of the proposed 2022 Renewable Energy Growth (RE Growth)  
5 program.

6 1. The recommended 2022 ceiling prices and MW allocations including observations  
7 on key inputs to the development of ceiling prices.

8 2. Observations on the competitiveness of the solicitation process including the  
9 recommendation to bifurcate the Commercial Class for the 2021 program year and  
10 the proposed bifurcation of the Medium and Commercial Classes for the 2022  
11 program year.

12 **III. 2022 CEILING PRICES**

13 **Q. DID THE DIVISION PARTICIPATE IN THE STAKEHOLDER PROCESS FOR**  
14 **THE DEVELOPMENT OF CEILING PRICES FOR THE 2022 PROGRAM YEAR?**

15 Yes, the Division participated in three stakeholder meetings as follows:

16 1) July 27, 2021 – first stakeholder meeting

17 2) September 8, 2021 – second stakeholder meeting

18 3) September 21, 2021 – stakeholder meeting to discuss affected system operator  
19 (ASO) studies

20 In addition, the Division participated in informal calls with SEA to discuss the key factors  
21 influencing the ceiling price calculations and the CREST model. The Division submitted  
22 written comments in response to the requests for comments issued by OER/SEA at each of  
23 the two stakeholder meetings on July 27 and September 8.

1 **Q. WHAT KEY ISSUES EMERGED FROM THE STAKEHOLDER PROCESS WITH**  
2 **RESPECT TO CEILING PRICES?**

3 In addition to the normal review of all key factors/ inputs to the ceiling price calculation,  
4 SEA focused the stakeholders on several areas for a more thorough discussion/ analysis  
5 including the following:

- 6 1) Cost pressures
- 7 2) Degradation rates
- 8 3) Capacity factors for Small Solar
- 9 4) Post tariff market prices
- 10 5) Potential for additional sub-division of solar classes

11 **Q. WHAT FEEDBACK / INPUT DID THE DIVISION PROVIDE TO THE**  
12 **STAKEHOLDER PROCESS?**

13 A. The Division provided written comments dated August 20, 2021 in response to the first  
14 draft ceiling prices issued on July 13, 2021 and the stakeholder meeting held on July 27,  
15 2021. The comments are summarized below:

- 16 • Project costs – the Division acknowledged the likelihood of upward pressure on  
17 project costs due to inflationary pressures and supply chain constraints but  
18 suggested that industry stakeholders provide documentation to support a reasonable  
19 adjustment to the project costs used in the ceiling prices
- 20 • Post tariff market prices – the Division supported using an estimate based on  
21 escalated retail rates, but suggested that the resulting values should not be  
22 discounted by 40% as proposed by SEA.
- 23 • Degradation rates and capacity factors – the Division supported adjustment of  
24 degradation rates for Medium and Commercial scale solar while leaving the rate

1 unchanged for Large scale solar. The Division expressed potential support for  
2 changing the Medium solar capacity factor pending review of National Grid's  
3 study.

- 4 • Additional bifurcation of classes – the Division expressed support for maintaining  
5 the current Commercial class bifurcation and pursuing a bifurcation of the Medium  
6 class.

7 The Division provided written comments dated September 29, 2021 in response to the  
8 second draft ceiling prices and the stakeholder meeting held on September 8, 2021. The  
9 comments are summarized below:

- 10 • Project costs – the Division continued to express concerns over the uncertainty of  
11 project costs given the volatility in the market and the inability to predict the  
12 persistency and magnitude of the current pricing pressures. The Division supported  
13 using the lower end of SEA's estimates for project costs unless compelling  
14 evidence emerged to support a different conclusion.
- 15 • Post tariff market prices – the Division reiterated the position expressed in the  
16 August written comments and proposed using 80% of the escalated retail rates as  
17 opposed to 60%.
- 18 • Taxability of bill credits for residential customers – the Division recommends that  
19 the ceiling prices for Small Solar I be calculated with the assumption that the value  
20 of these credits are not taxable income.

21 **Q. DOES THE DIVISION SUPPORT THE PROPOSED SOLAR CEILING PRICES**  
22 **IN THIS DOCKET?**

1 A. No, the Division believes that the recommended ceiling prices for 2022 are not appropriate.  
2 Specifically, the Division reiterates the following issues from the written comments  
3 submitted on September 30:

4 1) The post tariff market prices should be higher and the Division proposed  
5 utilizing 80% of the escalated retail rate proxy.

6 2) For Small solar I, the Division recommended that the remuneration be treated  
7 as non-taxable. The Division believes this is the appropriate treatment for this  
8 class.

9 The Division believes that the ceiling prices should be recalculated with updated  
10 assumptions for the post tariff market prices. The recalculation for Small Solar I ceiling  
11 prices should also reflect the tax treatment noted above.

12 **Q. DOES THE DIVISION HAVE FURTHER OBSERVATIONS ABOUT THE**  
13 **PROPOSED CEILING PRICES FOR THE MEDIUM SOLAR CLASS IN THIS**  
14 **DOCKET?**

15 A. Yes, with respect to the matter of volatility in project costs and the impacts of inflationary  
16 pressure, the Division recognizes that this issue is real and has likely resulted in increases  
17 in actual costs. For example, a September 2021 report issued jointly by SEIA and Wood  
18 Mackenzie suggested that Q2 2021 solar projects saw year over year price increases  
19 ranging from 3% to 12.5 % (see September 2021 Solar Market Insight Report). This report  
20 stated that pricing for Residential solar increased by 3.0%, prices for non-residential  
21 projects increased by 6.3%, and utility scale projects increased by 11.6 to 12.5%. In  
22 addition, SEA issued a survey to stakeholders in June 2021 and the results of that survey  
23 supported the fact that project developers are experiencing cost pressures and suggesting  
24 that the typical year over year decline in project costs that has been applied in this process



1           may need to be reconsidered. That said, for the Medium solar class, the Division is  
2           concerned that the ceiling prices currently proposed coupled with the propensity of bidders  
3           to submit bids at or extremely near the ceiling price may encourage higher bid prices in  
4           2022 than may be warranted. A primary source of this concern comes from results of the  
5           third enrollment in Docket 5088 which were revealed on December 21, 2021. In this  
6           enrollment which closed in October 2021, six (6) Medium Scale solar projects were  
7           enrolled at an average bid price of 20.97 cents/kWh (ranging from a low of 19.99 to a high  
8           of 21.64). These prices were consistent with the pricing for all Medium Scale solar projects  
9           enrolled in 2021 (27 total projects averaging 20.83 cents/kWh). Furthermore, the Medium  
10          Scale projects enrolled in 2021 totaled 6.424 MW in aggregate, exceeding the target  
11          allocation of 5 MW. The proposed ceiling prices of 24.45 (Medium Solar II) and 26.65  
12          (Medium Solar I) are significantly higher than these recent bid prices and ~13% to 23%  
13          higher than the 2021 ceiling price of 21.65. Figure 1 below presents a visual image of the  
14          actual bid prices from 2019-2021, the proposed new ceiling prices for the Medium I and  
15          Medium II class and the 2021 Medium solar ceiling price.

16

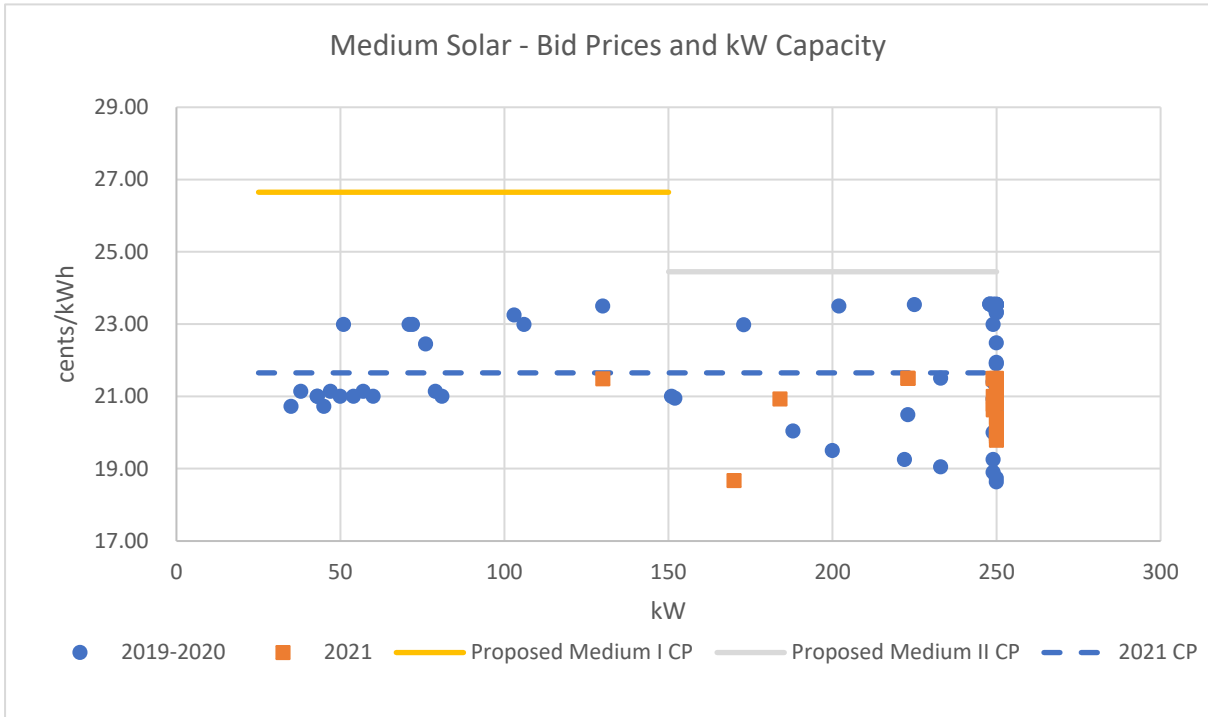


Figure 1

Recognizing the that the recent bids were all for projects that were sized close to the largest allowed size in this class (250kW), the Division believes that the ceiling price for the Medium Solar II sub-class should be set at the same level as the 2021 ceiling price (21.65 cents/kWh). For the Medium Solar I sub-class, the Division proposes to apply a 9% premium to the recommended Medium Solar II ceiling price, or 23.60 cents/kWh. This 9% premium is similar to the premium reflected in the ceiling prices currently proposed by SEA (26.65/24.45 or 1.0899).

**Q. CAN YOU PROVIDE MORE DISCUSSION ON THE TAXABILITY OF PERFORMANCE BASED INCENTIVES (PBI) FOR SMALL SOLAR I?**

**A.** Yes, it the Divisions position that residential owners of solar facilities are not required to report as income the value of bill reductions created by net metering programs or programs such as the RE Growth program that provides value to customers in the form of bill credits. Furthermore, the RE Growth program rules indicate that for residential customers, National

1 Grid is not procuring the energy from the participant, which is a key consideration  
2 regarding the taxability of this value stream. Finally, National Grid's tax guidance  
3 document states the following:

4 "Bill credits provided to residential customers will not be reported as income  
5 because National Grid will not be procuring energy from such systems. Residential  
6 customers only receiving bill credits, and not receiving PBI payments as the  
7 Applicant, do not need to provide a W-9."

8 This indicates that National Grid does not believe these bill credits are taxable income and  
9 does not intend to report them as such to the participant or the IRS.

10 **Q. DOES THE DIVISION SUPPORT THE PROPOSED CEILING PRICES FOR**  
11 **HYDROPOWER AND ANEROBIC DIGESTION?**

12 A. No, the Division is concerned primarily with the proposed ceiling price for the Hydropower  
13 class. The proposed price is 37.15 cents/kWh. This price represents a substantial premium  
14 to historic ceiling prices and, given the relatively small number of potential project  
15 opportunities in this class, presents a risk of excessive ratepayer costs for procuring  
16 renewable energy from this class. It is likely that a single project may submit a proposal in  
17 this category in 2022 and with the prospect of no competition, this ceiling price could allow  
18 a project to earn excessive returns, well above market. In the first enrollment in 2021, a  
19 732 kW hydropower project submitted a bid of 26.97, or 28% below the proposed new  
20 ceiling price. The ceiling prices for both hydropower and anaerobic digestion were heavily  
21 impacted by increases in insurance costs (up 47%) and capital costs up 21% for  
22 hydropower and 12% for anaerobic digestion. The Division recommends that the ceiling  
23 prices for 2022 reflected the values calculated in the first draft of the ceiling price

1 calculations, or 27.75 cents/kWh for hydropower and 22.45 cents/kWh for anerobic  
2 digestion.

3 **Q. SHOULD THE COMMISSION APPROVE THE RECOMMENDED CEILING**  
4 **PRICES?**

5 A. No, the Division believes that the ceiling prices should be revised as discussed above. The  
6 table below presents the Divisions calculations of these revised prices using the CREST  
7 model provided to stakeholders by SEA with the adjustments recommended above.

| <b>Class</b>                        | <b>2022 Proposed by<br/>DG Board</b> | <b>2022 Proposed by<br/>Division</b> |
|-------------------------------------|--------------------------------------|--------------------------------------|
| <b>Small Solar I (1)</b>            | 31.05                                | 25.25                                |
| <b>Small Solar II</b>               | 27.55                                | 27.25                                |
| <b>Medium Solar I</b>               | 26.65                                | 23.60                                |
| <b>Medium Solar II</b>              | 24.45                                | 21.65                                |
| <b>Commercial Solar I</b>           | 19.25                                | 19.05                                |
| <b>Commercial Solar I CRDG (2)</b>  | 22.14                                | 21.91                                |
| <b>Commercial Solar II</b>          | 15.75                                | 15.45                                |
| <b>Commercial Solar II CRDG (2)</b> | 18.11                                | 17.77                                |
| <b>Large Solar</b>                  | 10.95                                | 10.35                                |
| <b>Large Solar CRDG (2)</b>         | 12.59                                | 11.90                                |
| <b>Wind</b>                         | 22.40                                | 22.00                                |
| <b>Wind CRDG</b>                    | 24.60                                | 24.20                                |
| <b>Hydroelectric (3)</b>            | 37.15                                | 27.75                                |
| <b>Anerobic Digestion (3)</b>       | 25.55                                | 22.45                                |

**Notes**

(1) Adjusts for both income tax and for post tariff market prices

(2) Solar CRDG values are set at 15% above non-CRDG value for that Class

(3) Recommendation based on first draft ceiling price

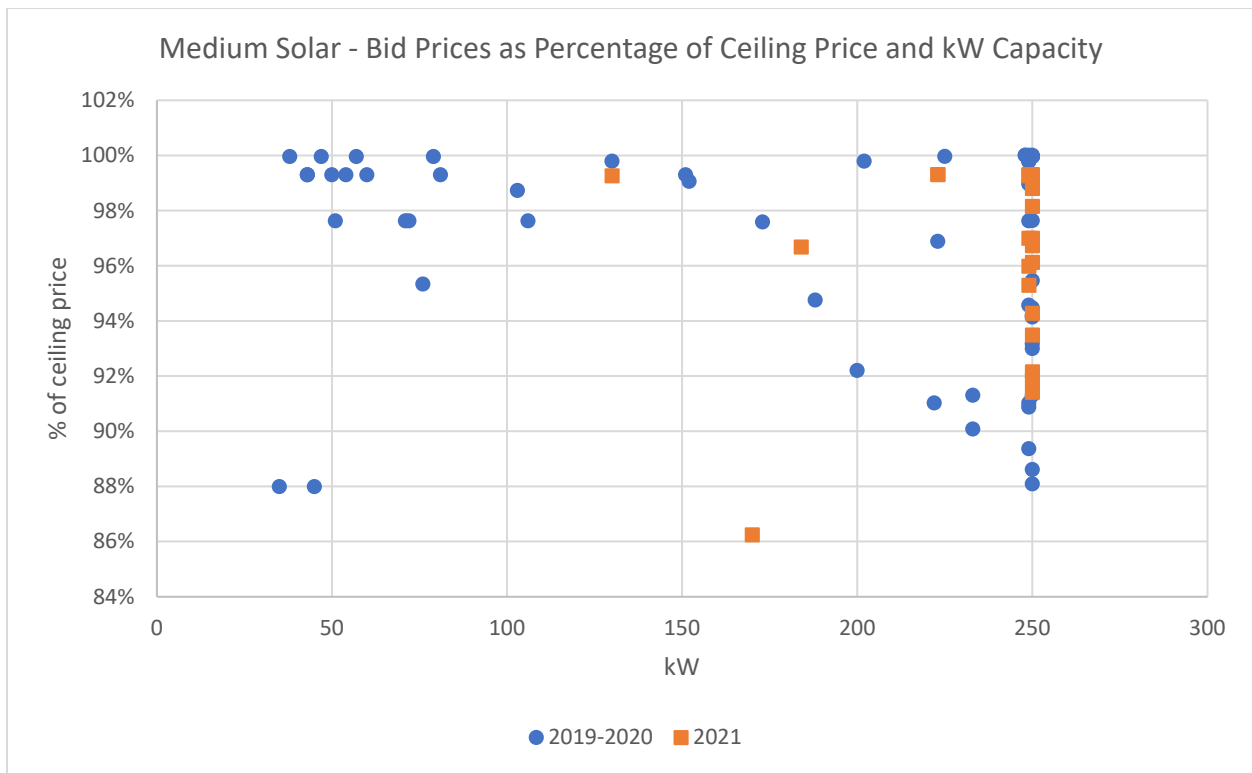
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1 **IV. COMPETITIVENESS OF SOLICITATION PROCESS**

2 **Q. WHAT WERE THEIR RESULTS OF THE 2021 ENROLLMENT PROCESS IN**  
3 **TERMS OF THE COMPETITIVENESS OF PRICES BID AGAINST CEILING**  
4 **PRICES?**

5 A. Overall, the 44 projects that were enrolled in the program (43 Solar and 1 Hydroelectric)  
6 had bid prices that averaged 96% of the ceiling price. This is higher than the average of  
7 84% for the period 2015 to 2020. The sole Hydropower project submitted a bid of 26.97  
8 cents/ kWh versus a ceiling price of 27.35. The following charts provide a visual  
9 representation of the results for each of the three solar classes: Medium, Commercial and  
10 Large.

11 Medium Solar Class:



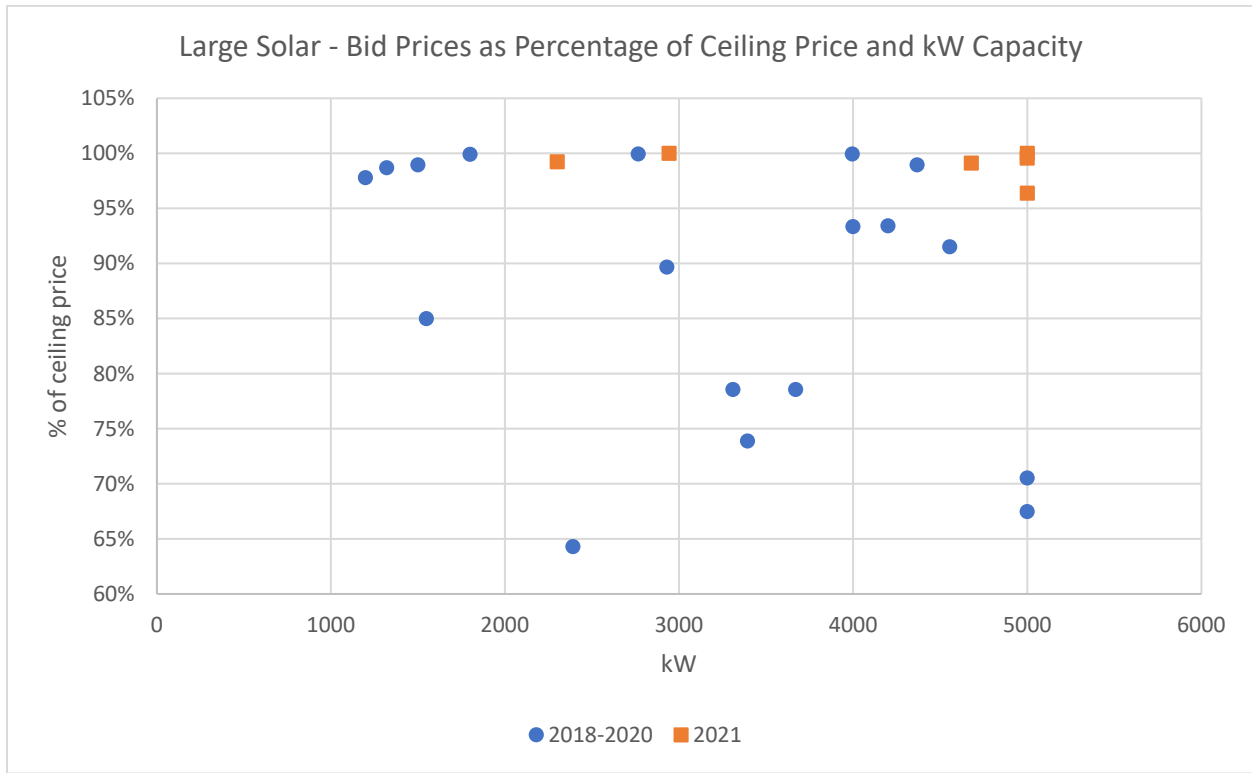
12 **Figure 2**



1 the ceiling price for the larger sub-class. It is unclear whether this bidder was aware that  
2 750 kW fell within the smaller sub-class and had a higher ceiling price.

3

4 Large Solar Class:



5

6

**Figure 4**

7 Figure 4 presents the bid prices as a percentage of the ceiling prices for the Commercial  
8 solar class from 2018-2021. The blue dots represent projects from 2018-2020. The orange  
9 dots represent the 6 projects from 2021. As has historically been the case, projects in the  
10 Large Class tended to be dispersed across the size range. The bid prices in 2021 tended to  
11 be closer to the ceiling price than in previous years. That said, the pricing in this class in  
12 2021 was at or near the lowest levels seen, averaging 11.23 cents/kWh, see Figure 5 below,  
13 which shows the bid prices in cents/kWh. Note, this average excludes the single Large  
14 CRDG project in 2021 which was proposed at 12.95 cents/kWh.

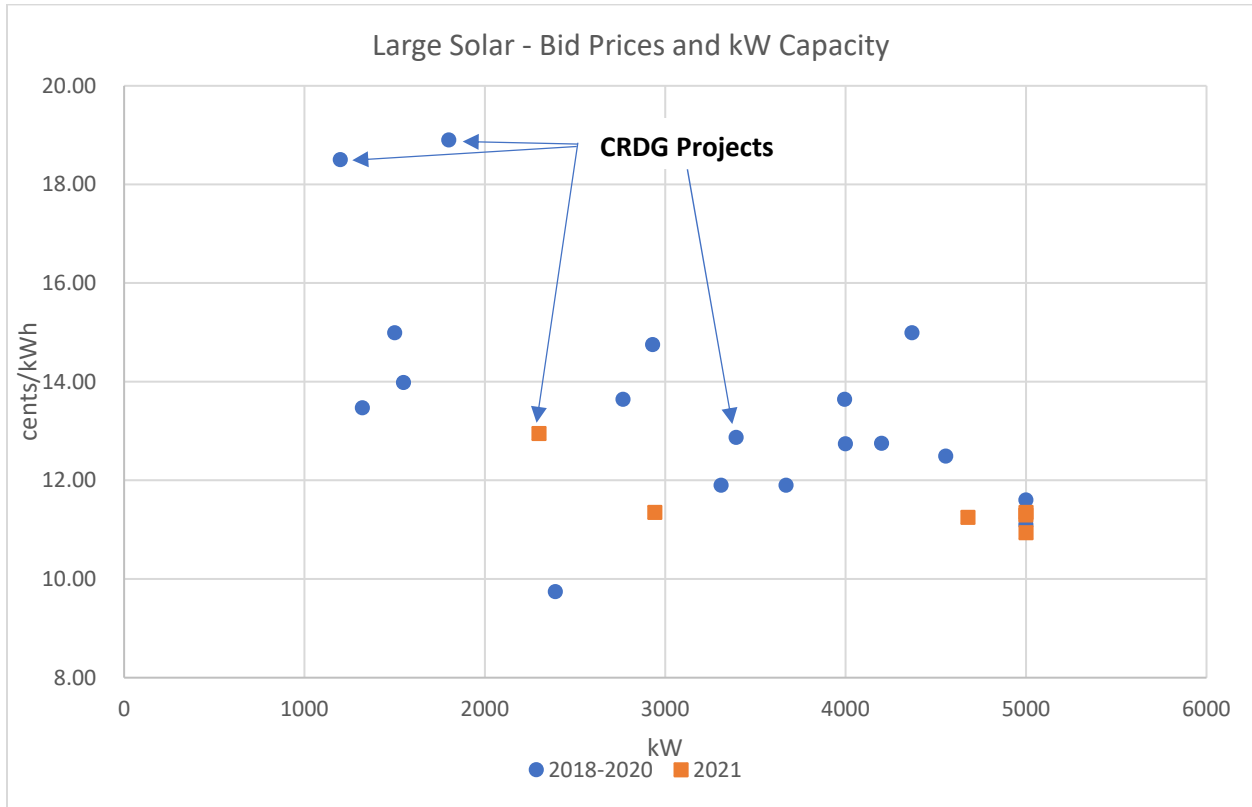


Figure 5

**Q. DID THE BIFURCATION OF THE COMMERCIAL CLASS IN 2021 RESULT IN MORE COMPETITIVE PRICING WITHIN THIS CLASS?**

In Docket 5088, the Commission approved the bifurcation the commercial class into two distinct sub-classes, one covering the range of projects sized between 251 kW and 750 kW and the other covering the range of 751 kW to 999 kW. This was intended to produce more competitive pricing on the higher end of the size range for the class by way of a lower ceiling price, reflecting the benefits of economies of scale for these larger projects. This lower pricing in this larger size sub-class was expected to be offset by potentially higher cost proposals in the smaller size sub-class, where the ceiling price is higher. The goal of the proposed bifurcation was to achieve a net gain in terms of weighted average pricing across the entire commercial class by encouraging more competitive bids for larger



1 projects. To ensure that a sufficient quantity of proposals (in MWs) were actually bid into  
2 the larger sub-class, the MW allocations for this class were split with 3.33 MW being  
3 allocated to the smaller sub-class and 6.67 MW allocated to the larger sub-class.

4 During the development of the ceiling prices in 2021, the proposed ceiling prices with and  
5 without the bifurcation are shown below:

6 Single Class, 250 – 999 kW: 17.65 cents/kWh

7 Bifurcation, 250 – 750 kW: 18.55 cents/kWh

8 Bifurcation, 751 – 999 kW: 15.25 cents/kWh

9 Weighted Bifurcation: 16.35 cents/kWh

10 The actual resulting proposals received / enrolled in 2021 are as follows:

11 Commercial, 250 – 750 kW: 8 projects totaling 4,992 MW's at a weighted average  
12 price of 17.38 cents/ kWh

13 Commercial, 751 – 999 kW: 2 projects totaling 1,997 MW's at a weighted average  
14 price of 15.20 cents/kWh

15 Overall: 10 projects totaling 6,919 MW's at a weighted average price of 16.75  
16 cents/kWh

17 Note, the weighted average prices shown above for the actual project bids are MW  
18 weighted prices. These results indicate that the bifurcation was partially successful in  
19 driving lower overall pricing in the Commercial class. The MW weighted average price of  
20 16.75 was below the ceiling price that was originally proposed for a single Commercial  
21 class (17.65) and was also below the MW weighted average price for projects enrolled in  
22 the Commercial Class in 2020 (17.81), however it was not lower than the weighted ceiling  
23 price for the bifurcated class (16.35). This is because the actual enrollment of ~5 MW in  
24 the smaller sub-class exceeded the annual target of 3.33 MW while the actual enrollment

1 of ~2 MW in the larger sub-class fell well short of the target of 6.67 MW. If the two sub-  
 2 classes had just been able to enroll equal amounts of MW’s at the same weighted average  
 3 bid prices the result would have been an overall weighted average price of 16.29, which  
 4 would have compared favorably to the weighted ceiling price for the bifurcated class  
 5 (16.35). The table below summarizes these results:

|                                | Commercial Sub-Class I (250-750 kW) | Commercial Sub-Class II (751-999 kW) | Total (MW Weighted for Prices) |
|--------------------------------|-------------------------------------|--------------------------------------|--------------------------------|
| Ceiling Price for Single Class | 17.65                               |                                      |                                |
| Ceiling Price                  | 18.55                               | 15.25                                | 16.35                          |
| MW’s Targeted                  | 3.333 MW                            | 6.667 MW                             | 10 MW                          |
| Actual MW’s Enrolled           | 4.992 MW                            | 1.997 MW                             | 6.919 MW                       |
| Actual Weighted Bid Price      | 17.38                               | 15.20                                | 16.75                          |
| Range of Bid Prices            | 15.25 – 18.50                       | 15.20 – 15.20                        |                                |

6  
 7 When the Commission approved the creation of the bifurcated Commercial class as a way  
 8 to spur a more competitive process, a key consideration was the need to allocate MWs to  
 9 the new sub-classes in a way that ensured that sufficient projects and MW’s would be  
 10 proposed and enrolled in each of the sub-classes, therefore ensuring that the average pricing  
 11 reflected this blend of larger, lower priced projects and smaller, higher priced projects.  
 12 Historically, the Commercial class has seen significantly larger levels of MW’s in the 751-  
 13 – 999 kW range. The table below illustrates this:

| # of Projects and MW's by Size in the Commercial Class |            |            |
|--|------------|------------|
|  | 251-750 kW | 751-999 kW |
| <b>Projects</b>  |            |            |
| <b>2018-2020</b>                                       | 17         | 18         |
| <b>2021</b>  | 8          | 2          |
|  |            |            |
| <b>MWs</b>   |            |            |
| <b>2018-2020</b>                                       | 8,675      | 17,587     |
| <b>2021</b>  | 4,992      | 1,997      |

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Before the introduction of the bifurcated Commercial Class, the number of projects was approximately the same in each size range (18 in the larger range and 17 in the smaller range) however the total MW's in the larger range was ~2x that of the smaller range. In 2021, the opposite was true with the MW in the smaller range being ~2.5x that of the larger range.

**Q. WHAT IS THE RECOMMENDATION OF THE DIVISION AS IT RELATES TO THE PROPOSED CONTINUED BIFURCATION OF THE COMMERCIAL CLASS AND THE PROPOSED NEW BIFURCATION OF THE MEDIUM CLASS?**

A. The Division observes that, while the overall MW weighted pricing in 2021 was favorable when compared with the potential single class ceiling price, the results would have been better, from the standpoint of minimizing costs, had more of the MW's been selected in the larger sub-class. It is possible that the 2021 ceiling price established for the larger end of the class was set at a level that did not encourage a sufficient number of projects to achieve the MW allocation to the larger Commercial sub-class. It is also possible that developers determined that it was advantageous to target the smaller Commercial sub-class given the higher ceiling prices. The Division recommends that safeguards be put in place in 2022 to ensure that the enrolled MW's in each sub-class more closely matches the targets (proportionally at a minimum). In other words, if the MWs enrolled in the larger range class falls short of the target, the MWs enrolled in the smaller range class should be limited to maintain the desired proportional mix. This could be accomplished in several ways, including limiting project selection in each enrollment based on the ratio of the annual targets. Alternatively, the first enrollment could focus solely on the Medium II and Commercial II sub-classes, with the second enrollment focused on Medium I and

1 Commercial I. The results of the first enrollment in terms of the MWs selected would  
2 inform the targeted number of MWs to be enrolled in the second enrollment. The third  
3 enrollment could then be open to all of the Medium and Commercial Classes, with  
4 selections made based on the proposals submitted and the targeted allocations.

5 **Q. DOES THE DIVISION HAVE RECOMMENDATIONS REGARDING THE**  
6 **ALLOCATIONS TO THE CLASSES AND SPECIFICALLY TO THE**  
7 **ALLOCATIONS FOR THE MEDIUM AND COMMERCIAL SOLAR CLASSES?**

8 A. The Division believes the proposed allocations are reasonable with one exception. Given  
9 the resulting large quantity of Small solar procured in 2021<sup>1</sup> and the cost increases that  
10 have driven higher ceiling prices in this class, the Division recommends a lower allocation  
11 of MWs to the Small Solar class and a higher allocation to the Medium Solar class. The  
12 Division recommends that the allocation be 5.950 MW to the Small Solar class and 6 MW  
13 to the Medium Solar Class (3 MW each to Medium I and Medium II). Furthermore, as  
14 discussed above the Division believes that it is important to ensure that allocations to sub-  
15 classes within the Commercial and Medium classes be deemed hard caps with no ability to  
16 use available excess MWs allocated to one sub-class to enroll projects in excess of the  
17 MWs allocated to the other sub-class. The Division is supportive of the allocations to the  
18 remaining classes.

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<sup>1</sup> According the National Grid website (<https://ngus.force.com/s/article/Residential-Renewable-Energy-Growth-program-available-cap>) as of December 27, 2021, the cap was expanded by 5.2 MW to 12.15 MW total. The original target for the Small Solar Class was 6.95 MW. The available capacity under this new cap was 2.78 MW meaning that 9.37 MWs had been procured as of that date, well in excess of the original target.

1 **VI. CONCLUSION**

2 **Q. DO YOU AND THE DIVISION SUPPORT THE NATIONAL GRID FY 2021**  
3 **RENEWABLE ENERGY GROWTH FILING?**

4 A. The Division believes that the ceiling prices should be revised downward to reflect the  
5 Divisions recommendations related to post tariff market prices and taxability of PBI's for  
6 Residential customers. The Division recommends that the proposed Medium Solar ceiling  
7 be set the current ceiling prices established in Docket 5088 for the Medium II class and  
8 setting the Medium I class ceiling price at a rate that is 10% higher than the Medium II  
9 class. The Division is also concerned that the increase in ceiling prices in the hydropower  
10 and anerobic digestion classes are not warranted and has recommended a lower value for  
11 both of these Classes. Finally, the Division has some concerns with the targeted allocation  
12 of MW's with respect to the Small, Medium and Commercial Solar classes and has  
13 proposed recommendations to address those concerns.

14

15 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

16 A. Yes.