

February 3, 2022

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

Re: Northeast Clean Energy Council Letter on Carport Adder in Renewable Energy Growth Program

Dear Ms. Massaro,

The Northeast Clean Energy Council (“NECEC”) hereby submits into the record the attached comment letter, which we had filed in October with the Distributed Generation Board. Through this submission, NECEC intends to underscore the broad industry support for continuation of the Solar Carport Adder.

NECEC similarly supports the January 5th joint letter from the Distributed Generation Board and the Office of Energy Resources to forge a path forward for the Solar Carport Adder. We should capitalize on opportunities to develop in preferred siting areas, especially when the modeling analysis indicates cost-effectiveness.

Thank you for the opportunity to provide these comments. Please contact us if you have any questions.

Sincerely,



Jeremy McDiarmid
Vice President, Policy & Government Affairs



Sean Burke
Policy Manager

Enclosure

October 29, 2021

Distributed Generation Board
1 Capitol Hill
Providence, RI 02908

Re: NECEC Comments to DG Board - Carport Solar Adder

Dear Distributed Generation Board Members,

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to submit comments in support of the continuation of the Carport Solar Adder within the Renewable Energy Growth Program (“RE Growth”). As Rhode Island seeks to maximize the development of renewable resources, with a particular emphasis on the built environment, the Carport Adder is a valuable tool that has led to projects sited in beneficial areas. It should be continued at a level at which the benefits outweigh the costs. NECEC is re-filing its October 25th letter to include a list of endorsing signatories who support the comments contained herein.

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.

In its Benefit-Cost analysis, Sustainable Energy Advantage (“SEA”) identified multiple benefits of the Carport Solar Adder including the opportunity to promote beneficial siting and alleviate land use challenges. In addition, unquantified benefits include avoided costs of snow clearing, and job-related benefits.

Any application of the Carport Adder that carries a Benefit-Cost Ratio greater than 1.0 should warrant a continuation for another year. As shown in the SEA analysis, there are several cases where the benefits outweigh the costs, including for high-benefits, low-cost commercial projects at a 7.5 cent adder level. Additionally, it is likely that the Carport Adder would be cost-effective across all or most cases if the adder level were to be reduced. We urge the DG Board to recommend that National Grid propose a Carport Adder at a value by which the benefits are greater than the costs, even if it requires reducing the adder from historical levels. Such approval will allow continued market development of this segment of the solar industry.

Thank you for your consideration of these comments. Continuing the Carport Adder, even at a reduced value, will allow developers the opportunity to respond to the adder to develop these beneficially sited projects and, as such, we recommend continuing the Carport Adder.

Please contact me if you have any questions.

Sincerely,



Sean Burke
Policy Manager

Endorsing Signatories

Doug Sabetti / Eric M. Martin
President / Sales Manager
Newport Solar

John Bernhardt
Director of Policy & Market Strategy
Pivot Energy

Kathleen Robertson
Director, Policy, Government Affairs, & Markets
Sol Systems LLC

James Schwartz
Vice President
Independence Solar LLC

Justin T. Somelofske
Associate Attorney
Handy Law LLC

Jaime A. Smith
Co-Founder and Managing Director
Lodestar Energy

Steve Cowell
President
E4TheFuture

David Malkin
President
DSM Realty Corp

John Typadis
Principal
Oak Square Partners

Amy E. Moses
General Counsel
Utilidata, Inc.

William Ellis
Founding Partner
New England Energy Development, LLC

Everett W. Tatelbaum
Vice President
Kearsarge Energy LP

Kai Salem
Policy Coordinator
Green Energy Consumers Alliance

Matt Shortsleeve
Vice President, Development
Solect Energy

Buzz Becker
Development Manager - RI Lead
Hexagon Energy

Matthew Doubleday
VP Project Management
ReWild Renewables, LLC