



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

Legal Section

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Rhode Island Public Utilities Commission
89 Jefferson Boulevard
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Dear Commissioners:

On July 25, 2023, the Office of Energy Resources (“OER”), on behalf of the Distributed Generation (“DG”) Board, filed a request for approval of a supplemental budget of \$215,811.00 for its consultant to perform program and ceiling price development for the Renewable Energy (“RE”) Growth Program. OER sought this supplemental funding as a direct result of changes to the RE Growth laws passed in June 2023.

The supplemental budget request was accompanied by a detailed memorandum prepared by Sustainable Energy Advantage, LLC (“SEA”) dated July 25, 2023. SEA has been the long-term consultant to the OER and the DG Board for the RE Growth program. In the memorandum, SEA describes the programmatic changes enacted for the near term and for a period of ten years. These changes include:

- The right to propose ceiling prices for a period no longer than three years into the future, whereas ceiling prices are currently determined annually;
- Disqualifies projects situated in “core forest” areas;
- Creates several new renewable energy classes; and
- Directs OER, the DG Board or Rhode Island Energy (“RIE”) to propose incentive-rate “adders” for projects on preferred sites requiring remediation.

In its proposal, SEA provides a comprehensive analysis of required tasks to effectuate the statutory changes and delineates whether the tasks are recurring or non-recurring.

The Division has carefully reviewed SEA’s memorandum and finds that its proposal has been carefully crafted, is well thought-out and will deliver maximum value to ratepayers. The Division particularly appreciates the DG Board’s effort to require delineation of recurring and non-recurring tasks.

While the Division is mindful of the substantial increase in proposed costs, we find that these incremental costs are a direct result of the program's legislative expansion and not the failure of the DG Board or OER's advance planning earlier this year, when they filed the original budget request. The Division recommends approval of this request.

Very Truly Yours,

Margaret L. Hogan, Esq.

cc: Linda D. George, Esq. Administrator
John Spirito, Esq. Deputy Administrator
Christy Hetherington, Esq.