For a thriving New England

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Via Electronic Mail

March 21, 2024

The Honorable Joseph J. Solomon, Jr. Chair, House Corporations Committee Room 101. State House Providence, RI 02903

Re: CLF Supports House Bill No. 7616 – Renewable Ready Program

Dear Chair Solomon:

The Conservation Law Foundation ("CLF") appreciates the opportunity to comment on House Bill No. 7616, the Renewable Ready Program. We offer our enthusiastic support for this bill.

Founded in 1966, CLF is a member-supported non-profit advocacy organization working to protect public health and the environment and build healthy communities in Rhode Island and throughout New England. CLF supports policies that increase New England's supply of clean electricity from renewable sources and help to achieve the greenhouse gas emissions reduction mandates of the Act on Climate.

As our state experiences significant growth in renewable energy generation there have been numerous conflicts regarding land use and the appropriate siting of renewable energy resources—both with respect to specific parcels of property and general land use classifications. Luckily, this proposal does not seek to weigh in on that contentious debate.

Instead, it seeks to identify and promote the use of contaminated and/or previously developed public property for renewable energy generation as a beneficial use. Rather than wading into the question of how existing forestland can be best used to address the climate crisis, our energy is better spent navigating how to put solar panels on preferred locations like municipal rooftops, the Department of Administration building, or contaminated property currently unused by Rhode Island Energy. Figuring out what actions are necessary to turn these properties into valuable distributed energy generating facilities starts with identifying them and soliciting information from the Office of Energy Resources and renewable installers on how best to finance and construct generation units.

In addition to identifying specific parcels of property that are particularly well suited for renewable energy generation, this proposal endeavors to create a process by which the RI Infrastructure Bank can subsidize the cost of bringing renewables online. This includes



potentially covering interconnection costs, which continue to be a barrier to construction of renewable generation facilities.

Interconnection costs may include necessary distribution grid upgrades to account for the needs of distributed energy generation, such as transformers or substations. In the end, each of these investments can and should be part of our shift to a more modern and flexible grid designed to facilitate two-way power flow across our distribution network. These investments are going to be critical as we continue to move towards greater electrification. Because the system upgrades that are made to bring renewable projects onto the grid are going to benefit all Rhode Islanders, it is logical to find more effective ways to cover the cost than the current byzantine method— charging individual developers for system improvements, who may then be reimbursed when other entities utilize those upgrades. This requirement of private funding for a public need is a hurdle that prevents necessary upgrades from occurring and reduces the size of renewable energy generation facilities. We can afford neither of these outcomes.

This bill is not a silver bullet for addressing climate change. It is, however, a targeted effort to utilize our public resources for the public good. In order to achieve the greenhouse gas emissions reduction mandates contained in the Act on Climate, Rhode Island is going to need creative solutions to many of these smaller policy issues. The proposed legislation will encourage private investment by utilizing public resources to address the current inadequacies of our electric distribution grid.

Thank you for your time and consideration of this testimony.

Respectfully submitted,

James Crowley Staff Attorney Conservation Law Foundation

cc: Members of the House Corporations Committee Representative June Speakman Representative Lauren Carson Representative Terri Cortvriend Representative Megan Cotter Darrèll Brown, Vice President, Rhode Island, Conservation Law Foundation