



## STATE OF RHODE ISLAND

### DIVISION OF PUBLIC UTILITIES & CARRIERS

Administration

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March 21, 2024

The Honorable Joseph J. Solomon, Jr.  
Chairman – House Committee on  
Corporations  
State House  
Providence, R.I. 02903

### Re: **H 7816 An Act Relating to State Affairs and Government – 2021 Act on Climate**

Dear Chairman Solomon:

While the Division appreciates the intent of H 7816 in addressing ethical and environmental issues, we nevertheless have significant concerns.

This proposed legislation does not identify whether the renewable energy credits generated in accordance with its provisions are intended to supplement and/or replace the current renewable energy certificates used by obligated entities to fulfil requirements under Rhode Island's renewable energy standard (RES). The lack of distinction between the credits generated under this act and certificates generated as part of the RES is problematic.

Due to the almost indeterminable amount of source materials used in the generation facility manufacturing processes it is the Division's position that monitoring/oversight necessary to accomplish the goals of this bill are far beyond the capabilities of this agency. Using the manufacturing of solar panels to illustrate this point, for the Division to qualify a generator as eligible to receive tradable credits under the provisions of this act, the Division would need to ensure all components (including glue, wiring, metal connectors, solder, wiring sleeves, plastic sheeting etc.) are not composed of materials excavated, processed, or manufactured outside the United States that uses exploitive labor, as determined by the United Nations International Labor Organization and do not contain silicon tetrachloride, cadmium, lead, or a chemical listed by the United States Environmental Protection Agency as a known or suspected carcinogen or genotoxin. These tasks appear more suited for a federal agency, rather than a state regulatory body.

Sincerely,



Linda George, Esq.

Administrator, RI Division of Public Utilities and Carriers

CC: The Honorable Representative Brian C. Newberry  
The Honorable Members of the House Committee on Corporations  
Nicole McCarty, Esq., Chief Legal Counsel