



October 29, 2021

Governor Dan McKee
Office of the Governor
82 Smith St.
Providence, RI 02903

Green Energy Consumers Recommendations for RI 2030

Dear Governor McKee,

Thank you for the opportunity to comment on the 2030 Working Draft. We commend you for your work to look at the multiple, complex, and intersecting issues facing Rhode Island over the next ten years, and for outlining potential solutions in the proposed draft. Green Energy Consumers Alliance's below comments focus primarily on the transportation and climate sections, with additional comments that apply to the document as a whole.

The underlying principles laid out to address climate change reflect a strong understanding of what is needed to get Rhode Island on track to cost-effectively meeting the Act On Climate goals. However, Rhode Island's ability to meet the Governor's 2030 vision will come down to the specifics. To that end, our comments here provide suggestions to establish a clearer vision for how to take the next steps on the ambitious but doable 2030 agenda.

Overall, we recommend that the draft more comprehensively integrate climate, energy, and transportation across all sections. In particular, climate and energy can be integrated into sections on housing and economic development. We note that any new infrastructure investments, especially in buildings, should be zero energy or go to supporting that goal. New investments in buildings and transportation systems should prepare for a conversion to electrified transportation.

Finally, before moving on to specific comments on the transportation and climate sections of the 2030 Working Draft, Green Energy Consumers urges the Governor to work to make sure that this holistic plan—and many of the proposals contained therein—are included in the upcoming Act on Climate decarbonization plan. We hope that the process to develop a 2030 Working Draft abets the Act on Climate planning process.

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CLIMATE

The report makes many good recommendations in the climate section. However, the organization of the section could be improved to explain how the recommendations come together to achieve our climate goals. The authors could consider organizing the recommendations by sector (transportation, buildings, electricity, energy affordability, as well as resiliency and non-energy climate issues) in addition to timeline (short-term vs. long-term) to improve clarity. It would also be helpful to clearly indicate which policies can be implemented by the Administration and which need legislative approval.

Climate Objectives

- This section should include a reference to reducing emissions from transportation.
- This section should set a goal to create good jobs in the clean energy sector.
- We strongly support the commitment to a 100% Renewable Energy Standard.
- We suggest that this section name the Heating Fuels Emissions Cap as a possible policy in the thermal sector, in addition to a Renewable Thermal Standard.

Where We Are Today As Rhode Island Emerges from the Pandemic

Green Energy Consumers commends the report for including a description of inequitable impacts of climate change on frontline communities. We further suggest that this section outline how properly targeted climate solutions, especially future investments in building and transportation, could benefit these communities--if driven by strong community engagement and leadership.

Short-Term Actions

- We support the expansion of staffing to aid Act on Climate implementation. We request that this work is conducted by FTEs in the state agencies who will be able to remain with this work for a long time. We further request that funding is reserved specifically for an Environmental Justice Director *and* a community engagement specialist.
- We strongly support the commitment to passing and implementing a 100% Renewable Energy Standard in 2022. We urge the Governor to specify that this 100% Renewable Energy Standard should reach 100% by 2030, a feasible and beneficial goal for the advancement of our clean energy economy.
- We urge the Governor to include a specific MW target for procurement of offshore wind by mid-2022. The MW target should be at least 1000 MW to get the best value for ratepayers and to keep pace with procurements happening in other states.

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- We thank the Governor for his support of the Transportation and Climate Initiative, and we suggest that it be included in this list of short-term actions.
- Grid modernization and smart meter investments will be needed to accommodate upcoming distributed energy resources and electrified transportation/heating. We suggest that this list of short-term actions include requiring grid modernization and smart meter PUC filings from all Rhode Island utilities in 2022.
- We support the initiative to identify sustainable funding for thermal electrification. In addition to thermal electrification, sustainable funding to support deep energy efficiency retrofits should be identified. The structure and funding level of the current energy efficiency programs are insufficient to support necessary deep energy efficiency.
- Further, we suggest that the Governor kick off a “future of gas” proceeding with the PUC to look into how to transition away from the gas utility. staffing and funding for Act on Climate. In this proceeding, the Governor should consider a Heating Fuel Emissions Cap (patterned after RGGI and TCI), which would help us transition away from fossil fuel heat and fund new investments in clean heat.
- On-shore renewable energy development will remain important to meeting Rhode Island’s future clean energy needs. Short-term actions should include a commitment to statutorily expanding Renewable Energy Growth, particularly by adding more megawatts in new categories for solar on carports and solar on schools, and expanding existing categories for rooftop solar on residential and commercial buildings.

Long-Term Actions

- We support the principles put forth in this section, particularly the commitment to building emissions reductions into state planning.
- Policies to include under long-term actions could include: future procurements of offshore wind, commitments to adopting zero energy building codes and building energy performance standards, the establishment of a heating fuels emissions cap, the creation of a new third-party energy efficiency utility.
- We agree that energy affordability is important, and we suggest that Rhode Island tackle the problem of energy affordability by opening an investigation into the reducing the whole bill, rather than only focusing on the parts of the energy bill associated with clean energy.
- Workforce development and a just transition will be critical to our transition to a clean energy future. Project labor agreements for climate-related infrastructure projects and other policies to support well-paying jobs can help this happen.
 - This section should equally reference blue and green economy.

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ADVANCING INFRASTRUCTURE & TRANSPORTATION

As noted in the state plan, addressing climate change has clear ties to the state's other 2030 priorities, including enhancing public health, housing, and particularly, advancing infrastructure & transportation. Here we highlight key overlaps between climate and transportation:

Short-term actions:

- We are glad to see the commitment to the establishment of a statewide networking of EV charging stations as a long-term action. To provide more specificity, we recommend committing to an EV adoption goal of at least 120,000 EVs on the roads by 2030, about 17% of the total vehicle stock in Rhode Island and proportional to Massachusetts' target. Charging infrastructure expansion can be sized to set the state up for success to meet the 2030 EV adoption goal.
- Policies in the short-term could also include: a directive to the PUC and utility company to prepare grid infrastructure; a proposal to encourage off-peak charging incentives to maximize benefits to EV drivers and the system; and directive that all new buildings install "EV-Ready" infrastructure for a minimum number of parking spots, depending on the size.
- Electric vehicles are not just passenger cars. Transit buses and electric school buses have high potential to improve air quality and decrease climate-warming emissions. We encourage executive coordination with RIPTA, municipalities, school administrators, and other key stakeholders to advance the adoption of electric buses.
- As advancement in EV charging infrastructure ramps up, so will the demand for qualified electricians. A clear target for the number of ports installed will allow training to prepare workers to keep up with demand.
- We appreciate the recognition that a transit system is vital for economic development, regional connectivity, and GHG reduction. We would like to see a commitment to stabilize or decrease vehicle-miles-travelled in Rhode Island to support investment in transit and bicycle infrastructure. The implementation of the Transit Master Plan, as listed in the long-term recommendations, is crucial. We believe the implementation of the Bicycle Mobility Plan should be specifically listed as well.
- We agree that transportation infrastructure (namely, roads and bridges) should be in a state of good repair, particularly as a resilience strategy to mitigate the effects of climate change. However, we advise against funding maintenance of highways and roadways through expansion.

Long-term actions:

- Within the "Climate" section, there's a commitment to "ensure that investments [in housing, infrastructure, and transportation] are being made with climate change in mind so that we

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are properly preparing Rhode Island for the future.” In this spirit, we suggest adding a commitment in the Infrastructure & Transportation section to assess projects in

the Statewide Transportation Improvement Plan on the basis of their contribution to or mitigation of greenhouse gas emissions and prioritize projects that advance the goal of emissions reduction.

- TCI will provide the state \$20 million annually to kickstart clean transportation investments- a good start for the short-term. In addition to TCI, Rhode Island needs to align its traditional mechanisms of funding transportation investments to better align with the Act on Climate.

Thank you again for the opportunity to comment on this Draft. We look forward to engaging with the administration on all aspects of the transition to a low-carbon future.

Sincerely,

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