



For a thriving New England

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Via Electronic Mail

May 12, 2026

The Honorable Louis DiPalma
Chair, Senate Finance Committee
Room 35, State House
Providence, RI 02903

RE: CLF Comments on Senate Bill No. 2764 Sub-A

Dear Chair DiPalma:

Thank you for the opportunity to provide testimony on Senator Tikoian's Senate Bill No. 2467 Substitute A. **This bill, in comparison to the Governor's budget proposal, provides a much more reasonable pathway to revisiting and revising the Renewable Energy Standard, a critical policy for reducing our reliance on fossil fuels and building a local, renewable energy economy.**

Conservation Law Foundation ("CLF") is a member-supported non-profit environmental advocacy organization working throughout New England to counter climate change, restore the health of our oceans, embolden new energy infrastructure, and safeguard health, quality of life, and economic prosperity for future generations. We are working to reduce emissions, address the climate crisis, and push for affordable and equitable energy policies in Rhode Island and across New England.

CLF remains skeptical about the need to add nuclear power as an eligible resource to meet any portion of the Renewable Energy Standard ("RES"). Our concern is that the purpose of the RES is to bring new generation online in the region to sever our overreliance on volatile, polluting, and unhealthy gas for our energy generation. In other words, the RES is intended to function as an incentive to develop **new** renewable resources. Giving RES money to the owners of **existing** resources furthers no public policy goal. It would function as an unearned windfall to out-of-state power plant owners for which Rhode Island ratepayers would receive no benefit.

We keep hearing about the need for new energy to meet a growing load. Instead of tackling that problem, this bill proposes to give preferential treatment to an existing nuclear facility. The nuclear facility is **already** providing carbon-free energy to the grid. The carbon-free generation is paid a market price for its generation and the carbon-free benefit is represented by lowering the emissions the mix of energy that already on the grid. There are no new benefits created for

Rhode Islanders if we enter into a direct contract with an existing facility. We need to bring new generation online, not fight with other states to “take credit” for a facility that has been in operation for over 50 years.

Finally, CLF does not believe it to be sound policy to allow Renewable Energy Certificates (“RECs”) to be banked for three years. This provision enables an accounting trick to make our state’s measured emissions plummet in a single year to satisfy the Act on Climate’s 2030 requirements. This will allow and incentivize our energy suppliers to save up RECs from 2027, 2028 and 2029 so that they can, in bulk, be retired in 2030. In other words, its purpose is to make it look like we hit the 2030 requirement by claiming that emissions reductions that actually happen over three years all happen and should be counted in just a single year. This is not a path that is sustainable over the long term. We need to move closer to real-time accounting of renewable generation and consumption rather than distancing the two events by an additional year.

Thank you for your time and consideration of these comments.

Sincerely,



Jamie Rhodes
Senior Attorney, Rhode Island
Conservation Law Foundation

cc: Members of the Senate Finance Committee
Darrèll Brown, Vice President, CLF Rhode Island