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PUBLIC COMMENT ON THE 2019 ENERGY EFFICIENCY PLAN

Thank you for the opportunity to provide public comment on the 2019 Energy Efficiency Plan.

I would like to first highlight today's very good news that Rhode Island retained its overall rank of #3 in the nation on the annual ACEEE Energy Efficiency Scorecard. Rhode Island also scored extremely well in the utility program category, tying Massachusetts for first. These rankings directly relate to the hard work of National Grid, stakeholders in the Energy Efficiency Collaborative and this Council. Thank you for your commitment to the policy of Least Cost Procurement and to ensuring that Rhode Island remains a leader on cost-effective efficiency.

A year ago, energy efficiency in Rhode Island was facing a setback. The 2018 Annual Plan, while still a good plan, was diminished by the General Assembly's scoop of ratepayer funds and an artificial budget cap that deprived customers of energy and bill savings. Acadia Center is pleased that energy efficiency appears to be back on track in Rhode Island this year. Through dedicated advocacy in and beyond the State House, energy efficiency programs were protected from further harm this year and will provide – without limitation – significant economic, consumer and environmental benefits in 2019.

Acadia Center has been deeply involved in the development of the 2019 Plan as a member of the Collaborative. The 2019 Plan is a strong plan that offers a full range of programs that, together, are cost-effective and cost significantly less than traditional energy supply.

The 2019 Plan advances the Acadia Center priority of strategic electrification, with new or expanded residential and commercial heat pump programs and incentives. While the initiatives outlined in this plan lay a foundation for further electrification, much work remains. According to Acadia Center's [EnergyVision 2030](#), 13% of oil, gas, and propane heating in homes and 5% in businesses in the Northeast need to be converted to heat pumps by 2030 to put the region on track to meet its greenhouse gas emissions goals. Maine has already demonstrated that this conversion rate is possible, switching 3% of its residential heating stock to heat pumps in about three years. To capture this potential in Rhode Island, heat pumps must be promoted through incentive programs, consumer education, workforce training, and electric rate design.

Acadia Center is pleased the Plan includes demand response as a full program in 2019 given the significant benefits of reducing peak usage, especially for commercial customers and the system overall. Because the electric grid is designed and built to meet needs of the peak hour, increases in energy efficiency can delay or defer expensive new infrastructure, which is paid for by utility customers.

Acadia Center also appreciates the Plan's efforts to better serve hard-to-serve customer segments, including low-income customers and renters. It remains critical that the many benefits of Rhode Island's nation-leading efficiency

programs be realized by all customers and all sectors. Still more progress must be made on this front in future energy efficiency plans.

Acadia Center had urged National Grid to lower lifetime costs in the plan's final draft and is pleased the cost has dropped, even while electric savings increased to fully reach the Three-Year Plan goal. It is important that stakeholders and this Council continue to closely watch lifetime costs as deeper energy savings measures, beyond traditional lighting, are pursued. To maximize the benefits of energy efficiency for all, innovation will be required, but costs must also be prudent.

Plain and simple, energy efficiency remains the lowest-cost, cleanest energy resource available, and the 2019 Energy Efficiency will continue the state's progress delivering the benefits of efficiency to all Rhode Islanders. For these reasons, Acadia Center offers its support for the 2019 Plan and urges the Council to approve it.

For more information:

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