

2019 EE Plan Summary of Stakeholder Comments on First Draft and Changes for Final 10/3/18

Purpose of Document:

This document summarizes the key high level comments we received from Stakeholders on the first draft of the Plan and where the Company has addressed/not addressed comments. This is in addition to the detailed review and changes that the Company undertook with the OER and C-Team on all of the attachments and main text of the plan. All Stakeholders can see changes from First to Final Draft in the redline changes.

PP&L Comments

- ConnectedSolutions
 - PP&L wants further detail on the expansion of residential demand response programs, especially with regard to electric vehicle chargers and battery storage. Given the widespread availability of smart charging technology and demonstrated effectiveness of demand response battery programs in other states, we encourage ambitious pursuit of savings in these areas.
 - PP&L wants to see winter peak
 - PP&L wants to see other technologies beyond tstats in resi DR program.

Company Response:

- Text around demand response was expanded. The Company explained the issues with winter peak DR during the last Collaborative meeting. The Company includes existing batteries, water heaters, and EVs in residential demand response program.

- Peak Savings
 - PP&L says first draft is short on Annual Peak kW Savings goal set in the Three-Year Plan.

Company Response:

- Company had to find annual KWh savings where it could to meet the savings gap for 2019 in the Three-Year Plan. This created a different mix of measures which had a different load shape resulting in fewer Annual Summer peak kW. However with the addition of the demand response programs which are additional to the Annual Summer peak kW savings, the Company finds the 2019 Annual Plan will be stronger than what was originally envisioned in the Three-Year Plan in addresses summer peak.

- Wants more heat pumps for fuel switching (delivered fuels to electric)

Company Response:

- These were increased in final draft as discussed at last collaborative meeting. As mentioned at Collaborative, if we see market and customer demand grow more than planned in 2019 we can work to try to manage budgets to address any increased demand.

	MEASURE	2019 Plan QUANTITY 1st Draft	2019 Plan QUANTITY 2nd Draft	Changes from 1st Draft to 2nd Draft

Income Eligible	Minisplit Heat Pumps - Electric Resistance	10	15	5
Income Eligible	Minisplit Heat Pumps - Oil Fuel Switching		15	15
HVAC Electric	Oil Fuel Switching	20	40	20
HVAC Electric	Oil Fuel Switching Replace on Failure	10	5	-5
HVAC Electric	Electric Resistance Fuel Switching	35	40	5

- Wants more lifetime savings.
Company Response:
 - This increased slightly in final draft as discussed at last Collaborative meeting.
- PP&L suggests changes to fund balance section of main text.
Company Response:
 - This was addressed in final draft.
- PP&L would like to see a lower gas charge
Company Response:
 - The gas charge was lowered due to reducing budgets and also changes to fund balance.
- PP&L would like us to make sure we're right sizing our budgets.
Company Response:
 - Electric budget and gas budgets were reduced in final draft as described at last Collaborative meeting.

Acadia Center

- Wants us to meet the electric savings targets in 3YP.
Company Response:
 - Final draft meets 3YP targets.
- Cost/saved energy too high – would like it to go down in second draft.
Company Response:
 - Electric budget and gas budgets were reduced in final draft as described at last Collaborative meeting.

- Wants low-income program to offer electric heat pumps to delivered fuels customers – right now only have electric to electric.

Company Response:

- This was changed for final draft as described at last Collaborative meeting. There is now oil to electric and electric to electric heat pumps in final draft for income eligible customers – see chart above.

City of Providence

- Wants oil to electric heat pumps offered in low-income.

Company Response:

- This was changed for final draft as described at last Collaborative meeting. There is now oil to electric and electric to electric heat pumps in final draft for income eligible customers. See chart above.

- Wants dealer training for the installation of MSHP expanded to all HVAC dealers, not just oil and propane dealers.

Company Response:

- Company does offer training through HVAC program to all dealers. This has been the case in past program years and will continue in 2019.

TEC-RI

- Wants to see a chart similar to the 3YP to 2019 Plan for a comparison between the 2018 and 2019 Plan

Company Response:

- The Company included this in its presentation materials for the Final Draft at the EERMC Meeting and the Collaborative meeting to show the changes from 2017, 2018, 3YP and first and second drafts.

- Wants lower cost and to keep budget where it was when we gave the preview at June Collaborative.

Company Response:

- As caveated in the presentation where the original estimates were given this was a high level estimate that the Company indicated would change based on “Budgets and charge depend on many factors that will continue to be refined up until final draft: Measure mix, electric sales forecast, FCM revenue, fund balance, legislation, evaluation results.”
- Per this caveat, in working to achieve the savings targets in the 3YP the Company had to refine the measure mix to grow savings. However, the Company worked hard to lower the electric and gas budgets for final draft. Now the electric charge is lower than it was in 2017.

- Concerned about equity changing

Company Response:

- In first draft these pie charts had not been updated. Final draft shows similar trends in electric and gas to last year. The C&I sector receives 70% of electric plans lifetime savings. Receives much more in savings compared to funds collected and budget.

CTEAM Main Text Comments

- Suggested edits on main summary table
Company Response:
 - Addressed and changed per recommendation.
- Recommended improvements to description of reconciliation language in the charge
Company Response:
 - Addressed and changed per recommendation.
- Suggested edits on bill impact wording
Company Response:
 - Addressed and changed per recommendation.
- Page 10 – evaluation changes. Wants an actual number increase/decrease to lifetime savings from the evaluations.
Company Response:
 - Addressed and changed per recommendation.
- Future innovation section Page 11. More items that could be counted as “innovation” to include in this list. Also needs an explanation of “The transformation of the lighting market is a key contributor to achieving additional savings in 2019”
Company Response:
 - Addressed and changed per recommendation.
- Participation Page 24
Company Response:
 - Addressed and changed per recommendation.
- Fund balance Dec 1st filing text recommendations
Company Response:
 - Addressed and changed per recommendation.
- Metrics section edits
Company Response:
 - Addressed and changed per recommendation.

OER High Level Comments

- Add mention of 4600 matrix in main text

Company Response:

- Addressed and changed per recommendation.

- Add text to PST interaction section to highlight coordination with electric heat, outreach and all initiatives undertaken by the Power Sector Transformation Advisory group.

Company Response:

- Addressed and changed per recommendation.

- Pilots Comments:

- Want text added to show more clarity on how Pilots, Demonstrations, Initiatives and Assessments will or will not be included in the calculation of shareholder incentives.
- A table summarizing all of these efforts with key information such as start date, duration, goal/objective, cost, and participation is needed to appropriately set expectations for 2019.
- If Demonstrations, Initiatives, and Assessments are not considered pilot activities, please explain how and why they do not meet the Pilot definition included in the Standards.

Company Response:

- Addressed and changed per recommendation.

- Workforce section.

Company Response:

- Addressed and added to residential section.

- Evaluation language needs improvement to show that it isn't changing savings.

Company Response:

- Addressed and added to residential section.

- Metrics:

- Want a commitment to coordinate with Power Sector Advisory group on metric development, etc.

Company Response:

- Addressed and added to residential section.

- Want additional metrics

Company Response:

- Added cost per kWh savings and cost/DR savings
- Will examine how to develop a customer satisfaction metric across C&I programs during 2019.
- Added Text to indicate striving to report out on all measures contribution to carbon equivalent to match Resilient RI goals.