



STATE OF RHODE ISLAND
**ENERGY EFFICIENCY &
RESOURCE MANAGEMENT COUNCIL**

March ##, 2020

Chairperson Margaret E. Curran
Commissioner Marion Gold
Commissioner Abigail Anthony
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: National Grid's Motion for Clarification and/or Relief of Order (Docket # 4979)

Dear Commissioners,

The Energy Efficiency and Resource Management Council's (EERMC) primary mission is to provide structured stakeholder participation and oversight of Rhode Island's energy efficiency and least cost procurement initiatives. The EERMC also acts as a public forum for discussion and feedback on current and future energy efficiency programs and attempts to provide representation for all energy customer segments.

The EERMC voted to approve a 2020 Energy Efficiency Plan that supported not only a continuation of the ASHP Delivered Fuels Displacement Program, but also an explicit increase in the program's participation numbers. Based on public discussions and stakeholder input, the EERMC respectfully asks that the Public Utilities Commission (Commission) approve National Grid's motion for Clarification and/or relief regarding a ramp-down process for ASHP Delivered Fuel Displacement Program incentives.

The Commission's ruling on National Grid's 2020 Energy Efficiency Program Plan (EE Plan) in Docket # 4979 resulted in the suspension of the ASHP Delivered Fuels Displacement Program and associated incentives. This program change has left numerous customers and contractors without access to anticipated ASHP rebates. As documented elsewhere in the record by the utility and stakeholders alike, in some cases, ASHP systems were marketed to consumers and/or contractors procured equipment assuming these rebates would be in place.

The EERMC believes that National Grid's motion to ramp down the ASHP Delivered Fuels Displacement Program is a prudent means of mitigating the impacts of the Commission's decision on local consumers and installers. It would also allow for a smoother transition to the deployment of state-allocated funds designed to sustain momentum in the marketplace, as called for in the 2020-A Regional Greenhouse Gas Initiative (RGGI) Allocation Plan now pending at the Office of Energy Resources (OER). Therefore, the EERMC strongly encourages the Commission to approve National Grid's motion.

Thank you for your consideration.

Sincerely,

Chris Powell
Chairman