



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

March ##, 2020

Nicholas S. Ucci
Acting Commissioner
Rhode Island Office of Energy Resources
One Capitol Hill, 4th Floor
Providence, Rhode Island 02903

Re: Proposed 2020-A Regional Greenhouse Gas Initiative (RGGI) Funding Allocation Plan

Dear Commissioner,

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.

As you are aware, the EERMC voted to approve a 2020 Energy Efficiency Plan that not only called for a continuation of the Air Source Heat Pump (ASHP) Delivered Fuels Displacement Program, but also an explicit increase in the program's participation numbers. Through its regulatory review, the Public Utilities Commission (PUC) suspended this incentive program, which has contributed to significant uncertainty across the marketplace.

Recognizing the societal and individual benefits generated by a heat pump fuels displacement program, the EERMC strongly supports the Office of Energy Resources' (OER) efforts to restore market incentives previously made available through National Grid's energy efficiency programs. The EERMC recognizes that RGGI funds are not a sustainable source of funds for heat pump incentives. However, OER's allocation of \$2.7 million in RGGI funds for the 2020 Program Year will sustain positive momentum toward building the supply chain, workforce, and innovative solutions necessary to decarbonize Rhode Island's heating sector.

By restoring these incentives, OER will be helping to continue the growth of Rhode Island's local ASHP market and provide local homeowners and businesses with alternative heating solutions that drive greenhouse gas emission reductions. We applaud OER for taking these steps and moving quickly to reassure market actors and consumers that the state is serious about heating sector decarbonization.

Thank you for your consideration.

Sincerely,

Chris Powell
Chairman