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Christopher Powell, EERMC Chair
Carol Grant, Commissioner, OER

Dear Chairperson Powell and Director Grant,

In reviewing the EERMC agenda and reading the C-team report on whether customer expenses are included in the calculations, I have a serious concern that is somewhat related. It does not apply directly to this agenda item, however, since you are removing customer expenses from the equation.

Customers, rightfully, are expected to pay some of the cost of their own energy efficiency improvements. The incentive program was designed and implemented to cause the customer to implement deeper energy savings than they might otherwise.

In my own home this system did not work. Twice.

In (roughly) 2007-8 we wished to insulate our home. As a converted beach house (owned by my grandfather, a Narragansett Electric executive) it had no insulation at all. We ordered an energy audit through RISE Engineering. Our furnace and ducts were in the attic, and the home's configuration required that spray foam was the only reasonable solution. Instead, RISE suggested picking up the attic floor, raising the furnace, and using batts to insulate the attic floor. This would be less efficient and would leave the entire heating system in the unheated space, cutting down its efficiency considerably. The reason? "We don't do spray foam so we won't analyze it or provide incentive money for it." We paid for 100% of the spray foam ourselves.

Now it is 2017. We found mold in our home's under-floor insulation so removed it all and remediated. We have a very low (14-16" crawl space) so it is very difficult to work in. Again, spray foam is the only good solution. Again, RISE Engineering did a full house audit (not needed) but would not analyze nor price spray foam, and so no incentive money is available. Again, RISE said, "we don't do that work." Instead, they suggested using batts along the crawl space walls and putting plastic down as a vapor barrier. While this would be an improvement, it clearly was recommended because RISE does do this work.

I urge you to carefully consider motivation. Neither of these two audits proved to be impartial analyses where RISE is using our ratepayer dollars for the common good. They only analyze what they themselves install. The incentive program uses funds from all our bills and should and must be contractor-neutral.

I appreciate your hearing me and await a reply. I will not be at your December 14 meeting as I have an unmovable conflict.

Thank you



Jeff Broadhead