

RI EERMC
c/o Becca Trietch
RI Office of Energy Resources
One Capitol Hill
Providence, RI 02903

September 15, 2020

Hi Becca:

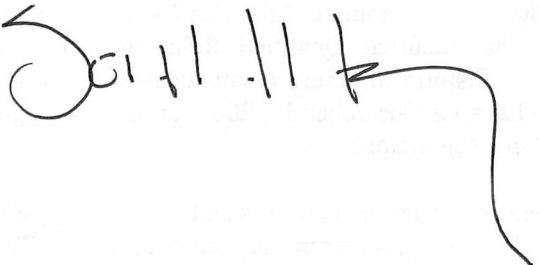
I write to comment on the proposed three-year efficiency plan. At a time when our State has such clear priorities for climate change, reduced energy costs, energy security, electrification of our thermal and transportation sectors, equity and the conversion to 100% renewable energy by 2030, I am very frustrated that the proposed three year efficiency plan for electricity and natural gas is less aggressive than the lowest scenario from your most recent opportunities report.

My understanding is that the EERMC requested a three-year plan that conformed with the most aggressive scenario from the opportunities report, which makes much more sense. It is very hard to understand how the EERMC could possibly justify anything less than seizing every possible opportunity for energy efficiency in these times. My understanding is that some members of the Commission may have concerns about the capital cost of executing on the aggressive efficiency plan, but there can be little question that efficiency investments pay off for customers, for our energy system and our society, as is well established in our State Energy Plan and especially when viewed through the lens of the docket 4600 cost benefit analysis required by our PUC.

Approximately 65% of our energy bill comes from the cost of National Grid's management of our transmission and distribution system through its affiliates New England Power Company and Narragansett Electric Co. respectively. Energy efficiency investments reduce the demands on and the costs of our transmission and distribution systems. Please be sure that all costs and benefits of energy efficiency have been carefully considered by a well-qualified entity that does not have a conflicting economic interest in transmission and distribution system investments. RI's mandate for least cost procurement and its Energy Plan policy goals on energy security, energy cost, equity and climate demands such an independent and accurate assessment.

Thank you for your consideration of these comments.

Sincerely,


Don H. H. .ll
com