

Memo



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

To: Energy Efficiency & Resource Management Council
From: EERMC Consultant Team
Date: August 18, 2022
Subject: EERMC Consultant Team Review of Equity Commitment Updates as provided in RIE Second Quarter Highlights

CONSULTANT TEAM

I. INTRODUCTION

This memo provides a detailed review of the Equity Commitment Updates provided in Rhode Island Energy's (RIE's or the Company's) Second Quarter Highlights. These commitments were drawn from Equity Working Group (EWG) deliberations and outcomes in 2021. For each commitment update, the Energy Efficiency and Resource Management Council (EERMC) Consultant Team (C-Team) has provided detailed comments, as relevant, regarding several considerations:

- The specific determination of whether a commitment¹ has been completed
- The degree to which specified commitments support overarching EWG recommendation
- Whether determinations of success can be adequately measured and include targets/goals
- Potential improvements to consider should the same commitment be included in the 2023 EE Annual Plan.

The next three sections cover, respectively, the C-Team's Overarching comments (Section II), how to read the sections on each specific equity commitment update (Section III), and the content of, and C-Team comments regarding, each individual equity commitment (Section IV).

II. OVERARCHING COMMENTS

The large majority of the C-Team's comments are specific to individual Equity Commitments. However, we wish to highlight four items we observed in several places:

- 1) In some cases, continuation of pre-existing activity has been characterized as a 2022 commitment. While this is not inherently a problem, it is important to separate out those commitments which do not represent incremental activity that is a direct response to the EWG recommendations, especially when forming an overarching view regarding the degree of Company responsiveness to and follow through regarding EWG recommendations.

¹ *Recommendations* have historically been developed by the Equity Working Group and used by the Company as one input for the equity elements of their Annual Plan. *Commitments* are specific, incremental actions the Company intends to undertake in a given program year in support of a specific recommendation. Metrics are ways of measuring outcomes from both recommendations and commitments. They should be quantifiable, time-bound, and supported by reporting data and other relevant information. Determinations of Success (e.g., targets) should be established for each recommendation and commitment using specific levels of attainment for relevant metrics that, if achieved, constitute success.

- 2) The Second Quarter Highlights Equity Commitment Updates (Q2 Update) table excluded all content regarding determinations of success for those commitments which were included in the original table in the 2022 EE Annual Plan. This omission, whether intentional or not, significantly impedes the ability of the reader to assess the degree to which RIE is on track or not to attain success. It also makes it challenging to determine whether RIE’s Equity Commitment Updates are providing the necessary function of tracking performance according to these determinations of success. In many cases, the determinations of success include (at least some degree) of quantifiable metric, and their exclusion from the Q2 Update undercuts the goal of providing transparency in this report. Note that the C-Team has added back the determinations of success to all individual equity commitment update sections below and included this information in the assessment of the updates.
- 3) As a general practice, it is very helpful to provide specified timeframes for individual commitments to be implemented, and separately, the timeframe by which data and other supporting information to inform the determination of success will be made available. In addition, in many cases the current set of commitments do not fully address the associated recommendation. In these instances, it would be very helpful to provide a multi-year ‘roadmap’ for how the Company will seek to fully address the recommendation – without this type of information, it is only possible to conclude that the recommendation will not be fully addressed.
- 4) Lastly, we note that the 2022 Annual Plan development process did not provide opportunity for Council review or feedback on the nature, appropriateness, or potential impact of the specific Company commitments included in the sections below. As a result, this review is the first substantive opportunity to provide feedback on these considerations.

III. HOW TO READ EQUITY COMMITMENT UPDATES

2021 Equity Working Group Recommendation for 2022 Annual Plan		
Current Activity (pre-2022 Company activities)	Current activity as listed in the 2022 Annual Plan.	
2022 Commitments and Status	Enhancement(s) as listed in the 2022 Annual Plan.	Company update included in 2022 Q2 Report.
Determination of success	Determination of success as listed in the 2022 Annual Plan.	

IV. COMMENTS ON INDIVIDUAL EQUITY COMMITMENT UPDATES

1. Develop multilingual marketing and outreach materials. Use accessible language to target audiences in each publication.		
Current Activity	Program collateral is provided in multiple languages on a case-by-case basis. The Company has done research into how to reach multi-cultural customers better, including a multi-cultural focused refrigerator recycling outreach campaign in 2020. The Company has also completed research on its primary customer personas, which give consideration to educational backgrounds. The customer personas have helped the Company understand what types of messaging may resonate most with different customers.	
2022 Commitments and Status	1. All Residential and Income Eligible (IE) email and direct mail will more consistently be translated into both English and Spanish.	Ongoing. All IE direct mail includes Spanish. Moderate Income flyer renter/landlord also in Spanish.
	2. Additionally, using lessons learned from the 2020 multi-cultural focused refrigerator recycling outreach campaign, the Company will launch a new, larger multi-cultural energy efficiency education campaign with the goal of increasing energy efficiency awareness and program participation among multi-cultural customers. Beginning with Hispanic customers, the effort will support the entire customer journey using new linguistic and cultural elements for web pages, customer toolkits, call-center support, and third-party partners. If the campaign is successful, it will be expanded beyond Hispanic customers.	Scheduled for 2023, 2022 was not a good time to launch the campaign given the sale of the Company.
Determination of success	A comparison of baseline data against post campaign data.	

C-Team Comments

- Commitment 1.1 indicates only partial attainment, with no comment on non-IE Res materials, email communications, or other written materials beyond those few specifically listed.
- Commitment 1.2 shows no progress and does not explain why company sale required a delay.
- Determination of success shown in 2022 Plan will be unattainable without significant progress on commitment 1.2. Additionally, determination of success is too vague to understand what is being assessed – what baseline data will be compared? What specific metrics? Hispanic customer participation? How will this inform whether efforts are undertaken for additional languages?

- 2022 Commitments only partially addressed EWG recommendation. **This recommendation is not on track for success in 2022.**

2. Hire multilingual staff and partner with trusted leaders who have the same ethnic background and that frequent popular community gathering places such as community centers and faith-based organizations.		
Current Activity	The Company has three (3) Customer Advocates with multi-lingual capacity who provide one-on-one individual assistance to customers through community-based efforts.	
2022 Commitments and Status	1. Provide additional energy efficiency program training to the Company's existing Customer Advocates so they can more effectively speak to the benefits of the programs.	In Progress- some training has been provided to the existing consumer advocates and will continue.
	2. Hire an additional Customer Advocate that will focus on promoting the energy efficiency programs. The new Customer Advocate will have community organizing experience and will be multi-lingual. The Advocate will deliver energy efficiency program information at community centers, faith-based organizations, multi-family housing, and other community gathering places. The Customer Advocate will leverage the expertise of existing community organizations that serve diverse households. The new hire will occur by mid-2022 before summer events begin.	Completed- new hire effective May 2022 currently being trained.
Determination of Success	<ol style="list-style-type: none"> 1. The completion of additional energy efficiency training for the Company's existing Customer Advocates. 2. The hire of a new Customer Advocate that will focus on energy efficiency. 3. The number of events the new Customer Advocate hosts/attends. 4. The number of customers reached at these events. 5. The number of customers that sign up for a home energy assessment or an additional program related action as a direct result of the new Customer Advocate's community-based outreach efforts. 	

C-Team Comments

- Commitment 2.1 was defined vaguely without a target for training content, hours, attendance, or outcomes. It is difficult to assess level of adequacy from the short and general update of 'some training provided'.
- Commitment 2.2 is marked as complete, however not enough detail has been provided to assess the level of completeness. For example, does the Community Advocate have community organizing experience? Are they multilingual? Are they hosting/attending events (Determination of Success 2.3)? How many events are they participating in? Are they reaching customers

(Determination of Success 2.4)? Are they signing up customers for energy assessments (Determination of Success 2.5)?

- Determination of Success 2.1 does not have a quantifiable metric included and should be made clearer. Determinations 2.2-2.5 describe a figure to be tracked and reported that is not reported and did not include a target quantity.
- 2022 Commitments only address first part of EWG recommendation. Q2 shows limited progress, does not address determinations of success. **This recommendation is not on track for success in 2022.**

3. Include in messaging that Rhode Island Energy is not code enforcement so residents can feel more comfortable.		
Current Activity	This information is not currently communicated in current program communications.	
2022 Commitments and Status	1. Provide vendor call centers with scripts to help answer any customer/landlord inquiries on this subject.	Completed
	2. Consider adding the language to landlord outreach, as appropriate.	Completed
Determination of Success	Whether or not a script has been provided to vendor call centers.	

C-Team Comments

- Commitment 3.1 is marked as complete, but no information is provided supporting that assertion. What scripts were provided? Can the language be shared to enable determination of whether this commitment is in fact adequately addressed?
 - o Related, are these scripts available in multiple languages with call centers able to route calls to appropriate multilingual staff?
- Commitment 3.2 is marked as completed but without any information about the decision that was made. The commitment’s only action is to ‘consider’ adding language to landlord outreach. Did that consideration occur? What was the outcome? Who made that decision? If language was added, what was added?
- Determination of success for this commitment is defined with too little quality or impact consideration. Providing a script is only the first step. Is the script consistently used? Is it clearly written? For example, call center metrics for script utilization and post-call customer satisfaction could be elements of much stronger determinations of success.
- 2022 commitments only partially addressed EWG recommendation (not clear that EWG was only referring to call center messaging). Commitments asserted as complete but more supporting information needed to ensure accuracy of this. **This recommendation is on track for success in 2022 pending shared supporting information**, though same messaging may warrant inclusion in other EE outreach.

4. Develop age-appropriate marketing strategies to connect with various age groups that live in a household such as utilizing social media, apps, and text messaging to reach new audiences and help engage customers with their energy usage.		
Current Activity	Social media is one of the Company’s primary outreach and communication methods, with advertisements and messages placed on Facebook, Instagram, Twitter, Snapchat, and NextDoor. Because of legal limitations and to ensure emergency communications are seen by customers, text messaging is currently only used to convey outage information.	
2022 Commitments and Status	Social media is one of the Company’s primary outreach and communication methods, with advertisements and messages placed on Facebook, Instagram, Twitter, Snapchat, and NextDoor. Because of legal limitations and to ensure emergency communications are seen by customers, text messaging is currently only used to convey outage information.	Completed
Determination of Success	N/A	

C-Team Comments

- The inclusion of a commitment under this EWG recommendation is inaccurate – the current activity description is the same as the commitment content. No commitments were made regarding this recommendation, so nothing has been completed and this framing is inaccurate.
- No commitments were made to support this recommendation. **Consequently, it should be omitted from tabulation of equity progress in 2022.**

5. Partner with other home visiting programs to expand the reach and impact of Rhode Island Energy’s energy efficiency programs.		
Current Activity	The Company provides energy efficiency outreach and educational materials to other programs on a case-by-case basis (e.g. “Cooling Flyer” for HousingWorksRI).	
2022 Commitments and Status	By March 2022, establish a working group to explore how to more comprehensively leverage other home visiting programs for energy efficiency outreach and education. The working group will be facilitated by the Company and will include home visiting program representatives. The working group will make related recommendations for the 2023 Annual Energy Efficiency Plan.	Completed- an outreach subgroup of the EWG has been created for this purpose.
Determination of Success	1. Whether or not a working group is established by March 2022. 2. Whether or not the working group completes recommendations by August 2022 for the 2023 Annual Energy Efficiency Plan.	

C-Team Comments

- Commitment 5.1 in support of this EWG recommendation is not adequate and will not lead to attainment of the EWG outcome. Commitment only calls for the formation a working group to create recommendations for a future year, which by itself is not expected to lead to partnerships with other home visiting programs.
- Commitment 5.1 is marked as complete, but no indication is provided regarding whether the EWG subgroup was formed by March 2022, as required by the commitment. Determinations of success are both process outcomes that are reasonable elements of a plan to achieve the EWG recommendation but are not by themselves related to any progress toward the actual recommendation. Determination of success 5.2 will be impacted by whether 2023 EE Plan equity section is updated by August 2022 with recommendations from this specific EWG subgroup. Note that simply including any recommendations from the broader EWG will not represent attainment of this determination of success.
 - o If EWG subgroup does not produce separate and distinct recommendations, it would be helpful to understand why. For example, are there timing or resource constraints? Were recommendations considered and an explicit decision was made to not provide recommendations? Something else?
- Overall, **we cannot assess whether this recommendation is on track** for success due to lack of supporting data and critical elements due during the current month.

6. Allocate a proportion of Energy Efficiency marketing budgets to municipalities for mailing energy efficiency materials; some municipalities use third parties for mailing.		
Current Activity	The Company's Community Initiative currently supports participating municipalities in promoting the energy efficiency programs.	
2022 Commitments and Status	1. Continue to support municipality efforts to promote energy efficiency through the Community Initiative.	Completed- working with the city of East Providence this year.
	2. Test the inclusion of energy efficiency program information in the water/sewer bills of one or more of the 2022 Community Initiative participants.	This year's EWG recommended not to proceed with this activity since many customers receive e-bills and do not read inserts.
Determination of Success	1. The continuation of the Community Initiative. 2. Call volume after the water/sewer bill insert(s).	

C-Team Comments

- Commitment 6.1 is marked as complete due to the Company working with East Providence in 2022. However, it is not clear that this commitment is actually a new activity – it appears to be the same as the current activity (e.g., it reads, “Continue to support...”). It is not clear that this should be characterized as a new commitment.
 - o It is not clear that continuing the Community Initiative in fact supports the EWG recommendation of allocation of marketing budgets to municipalities for mailing EE materials. More information needed about collaboration with East Providence to assess whether it is in fact supportive of this EWG Recommendation.
 - o It is not clear that partnering with a single municipality is a sufficient level of activity to claim completion – suggest a new determination of success which sets a target budget amount and target number of partner municipalities for 2023.
 - o Overall, should not be considered ‘completing’ a commitment for 2022
- Commitment 6.2 appears to have been abandoned based on input from EWG this year. Which specific entity initially raised the prospect of dropping this commitment? What data was cited to support that suggestion? It appears that the planned action was a data-gathering effort to ascertain the degree of impact that bill inserts could drive, so it is confusing to see the effort abandoned based on an assertion that the outcome of that data gathering exercise is already known, but without supporting data to justify that perspective/opinion.
 - o The C-Team suggests sharing underlying decision-making process and supporting data.
 - o Outcome appears to suggest that this year’s EWG is a different entity than last year. Have members changed significantly?
- In total, one commitment is not a new activity and the other has been abandoned, so this **recommendation is not on track for success in 2022.**

7. Provide incentives to community groups that are serving vulnerable populations.		
Current Activity	The Company does not provide direct incentives to community groups that serve vulnerable populations. The Company has regularly partnered with food banks to provide LED bulbs and energy efficiency information with household distributions. As mentioned under recommendation 5, the Company also provides energy efficiency outreach and education materials to other programs on a case-by-case basis.	
2022 Commitments and Status	The Company will expand collateral for more community groups that serve vulnerable populations.	In Progress- EE consumer advocate has identified community groups that will be provided with collateral and multi-lingual collateral is being prepared.
Determination of Success	Number of community groups that receive collateral for distribution.	

C-Team Comments

- Commitment 7.1 does not relate to or support the EWG recommendation to provide incentives to community groups serving vulnerable populations. Expanded collateral is an entirely different strategy, much less likely to be impactful, and does not relate in a clear way to incentives.
- The determination of success for this commitment does not contain a target level for attainment (e.g., successful if >25 communities receive collateral, not successful otherwise). In addition, the status update on the 2022 Commitment is vague.
 - o The nature, content, timing, update frequency, form, volume, and methods of provision for collateral are all unspecified, and yet impactful, elements of this commitment.
- Overall, specific commitments do not support the EWG recommendation and are not complete, so **the recommendation is not on track to achieve success in 2022.**

8. Develop a mechanism that allows participation or action to occur immediately after the marketing step.		
Current Activity	Each program has a different lead time based on the customer journey for that specific program.	
2022 Commitments and Status	Expand follow-up outreach for customers who receive a recommendation from the on-line home energy assessment, in-home/virtual home energy assessment, and/or home energy reports.	Completed for in-home and virtual. On-line assessment is a manual process.
Determination of Success	Tactics completed to increase follow-up outreach for customers.	

C-Team Comments

- Commitment 8.1 does have the potential to meaningfully support the EWG recommendation. However, information about what was actually undertaken to implement this commitment is absent, so a determination of success cannot be made.
- Further, the determination of success has an unclear definition and does not lend itself to a specific finding. The C-Team strongly encourages re-framing with more measurable and specific determinations of success in future.
- Overall, while individual commitment has potential to support EWG recommendation, **we cannot assess whether the recommendation is on track for success in 2022** due to lack of supporting data and vague metric for success.

9. Benchmark Energy Efficiency Program participation data for race, geography, socioeconomic status, language, age of home, age of owner, age of renter, heating fuel type, type and age of heating /hot water/cooling systems.		
Current Activity	<p>Through the Evaluation, Measurement and Verification team (EM&V) the Company is currently conducting a Participant and Multifamily (MF) Census study, and a Nonparticipant study, which will be completed in early 2022. The dataset produced for these studies will include account level detail on customer geography, socio-economic status, primary language spoken, age of home, age of owner/renter, age of heating/hot water/cooling system(s) being replaced, type of primary household heating system, primary heating fuel, and program participation. Education, race and ethnicity will be gathered by block group. Some information will be populated with third party data but will be useful in aggregate. The information from these studies will be compiled for public reports. The Participant and MF Census study will also provide implementation and marketing teams with a comprehensive database of MF buildings that includes building characteristics and an indicator of whether or not each building has participated in a program.</p>	
2022 Commitments and Status	<p>1. Work with external stakeholders to determine if the data sets and each related report should be refreshed on a regular basis.</p>	<p>Complete- Participant, Nonparticipant and MF Census studies have been completed and reports have been shared with the EERMC. This data is being used to shape and direct outreach plans and will be used to assist with program design in the future.</p>
	<p>2. Using internal data, establish a separate, regular report by Q2 2022 that shows participation for the EnergyWise, Multifamily, and the Income Eligible Single-Family programs at the zip code level. Utilize the report to target outreach.</p>	<p>Using year end spend by zip code as metric.</p>
	<p>3. Continue gathering rental unit participation data and reporting on that information quarterly at the “sector level meetings” with the RI Office of Energy Resources, their Consultant Team, and the Division of Public Utilities and Carriers.</p>	<p>Completed</p>

Determination of Success	<ol style="list-style-type: none"> 1. Completion of the Participant, Nonparticipant, and MF Census studies. 2. Presentation of report results at a public meeting, such as the Energy Efficiency Resource Management Council (EERMC). 3. Creation of a regular, zip code level participation report by Q2 2022 to target outreach for the EnergyWise, MF, and Income Eligible Single-Family programs. 4. Whether or not rental unit participation data continues to be gathered and reported quarterly at the “sector level meetings”.
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C-Team Comments

- Commitment 9.1 is marked as complete due to the completion of the relevant studies, but no information is shared regarding the outcome that commitment should produce – a finding regarding whether reports warrant regular updates. To our knowledge no specific reports have been shared beyond the final write-ups for the studies themselves, and no discussion has happened about how often data should be updated. Overall, this commitment is not on track.
- Commitment 9.2 is not complete and not on track. Using year-end spending as a metric for participation is not fully satisfactory, and no explanation has been provided regarding why actual participation cannot be reported. Further, the report was slated for completion by Q2 2022, and the commitment includes utilization of the report for targeted outreach. No information has been provided regarding a possible report, and no information has been provided regarding how such a report might be used to target outreach.
 - o Additionally, the EWG recommendation here is related to detailed benchmarking across a wide array of demographic characteristics. It is not at all clear how a single report showing geographic variation in program spending attends to the same concerns as detailed demographic data. It is also not clear why the report should be year-end only (rather than quarterly, like most other regular reports).
- Commitment 9.3 is partially met through current limited data reporting of the percentage of audits and number of weatherization participants within EnergyWise who are renters/landlords. It is important to distinguish renters as their own cohort, to include participation counts from other programs, and to show how renter participation varies across geography and the other key benchmarking characteristics included in the EWG recommendation as much as possible. However, as Commitment 9.3 is a continuation of previous activity, it should not be counted as a completed incremental equity commitment.
- The determinations of success here are largely process commitments to continue actions that were already planned (9.1, 9.2, and 9.4 all fall into this category). 9.3 has not been completed and represents the only incremental measurable item, but is also of limited use, as it only relates to the creation of a report, not its content, use, public availability, or impacts.
- Overall, the only supporting actions under this recommendation that have taken place are continuations of existing activity – the Participant and Nonparticipation studies were already in the pipeline prior to these commitments being developed, and the limited renter participation reporting is also a continuation. **Consequently, this recommendation is not on track for success in 2022.**

10. Track late payments and shut offs.		
Current Activity	Rhode Island Energy currently tracks this information and submits it to the RI PUC. The report can be found at: http://www.ripuc.ri.gov/eventsactions/docket/4770page.html , under Other Compliance Reports, Rhode Island Energy’s Low-Income Monthly pursuant to Article II, Section C.22.f. of the Amended Settlement Agreement.	
2022 Commitments and Status	Rhode Island Energy currently tracks this information and submits it to the RI PUC. The report can be found at: http://www.ripuc.ri.gov/eventsactions/docket/4770page.html , under Other Compliance Reports, Rhode Island Energy’s Low-Income Monthly pursuant to Article II, Section C.22.f. of the Amended Settlement Agreement.	Completed
Determination of Success	N/A	

C-Team Comments

- Commitment appears to be a continuation of an existing activity, which was already fully in place prior to EWG recommendations being adopted in 2022 Annual Plan.
- Unclear why this was included as a recommendation when the activity was already happening, so should not be considered ‘completing’ a commitment in 2022.
 - o Suggestion for 2023 Annual Plan to separately list ongoing activities that are planned to continue rather than intermingling with commitments about incremental actions.
- Overall, while this recommendation is being implemented, **this recommendation should be omitted from tabulation of equity progress in 2022** since the recommendation was adopted in the 2022 plan despite already being in place at the time of adoption.

11. Align energy efficiency programs with healthcare and partner to achieve healthcare goals, promote further engagement, and sharing health outcome and impact data.		
Current Activity	N/A	
2022 Commitments and Status	See recommendation 5. The working group will include healthcare home visiting programs as a part of their discussions.	Completed
Determination of Success	1. Whether or not a working group is established by March 2022. 2. Whether or not the working group completes recommendations by August 2022 for the 2023 Annual Energy Efficiency Plan.	

C-Team Comments

- The commitment here appears to be the same as the commitment supporting recommendation 5, which is to “Partner with other home visiting programs to expand the reach and impact of Rhode Island Energy’s energy efficiency programs”.
- Forming a working group to discuss and provide recommendations about partnering with other home visiting programs is not likely to drive meaningful partnerships that deliver healthcare goals, nor to result in collecting or sharing health outcomes data.
- Determinations of success are early process steps that do not inherently result in movement toward the recommendation.
- Commitment and determinations of success do not meaningfully progress EWG recommendation, and so **the recommendation is not on track for success in 2022.**

12. Perform a full review of all HR policies and remove outdated policies that restrict hiring such as background checks.		
Current Activity	Anyone that will be on a customers' property on the Company's behalf, or has access to customer data, is required to go through a background check process. There are different levels of background checks for different levels of customer interaction. For individuals that go on customers' property, the background check generally includes (among other things) a drug screening and an assessment of criminal history. There is a "needs review" process any time there is a negative finding. A candidate whose background check "needs review" is notified so they can have the opportunity to provide further explanation. Candidates can be granted an "exception" for any negative finding(s) that does not directly impact the safety of a customer or their property.	
2022 Commitments and Status	The Company believes it has reached the right balance to ensure the safety of customers and their property through its background check and exception process.	Completed
Determination of Success	N/A	

C-Team Comments

- Recommendation appears to be at odds with associated commitment. Company has provided no indication that a full review of HR policies was conducted, nor that any changes were made resulting from a potential review. Did EWG have opportunity to participate in or provide input regarding the full review of HR policies? Did they receive information about the outcomes of that review that is not included in this update?
- Commitment appears to double down on the specific barrier, background checks, which was raised as a concern in EWG recommendation. No supporting evidence is provided to justify claim that company has 'reached the right balance'.
- Because commitment opposes recommendation and no supporting evidence was provided, this **recommendation is not on track for success in 2022.**

13. Reduce barriers to professional development, as well as entry into the energy efficiency workforce.		
Current Activity	One of the Company's lead vendors is collaborating with the RI Builders Association, and their affiliate Residential Construction Workforce Partnership, on their new training program for weatherization in September 2021. The lead vendor's participation in these trainings will help ensure graduates are fully prepared to work in the Energy Efficiency Programs.	
2022 Commitments and Status	1. Complete a workforce development needs assessment modeled after, and building on, this report completed in MA: https://ma-eeac.org/wp-content/uploads/Massachusetts-Energy-Efficiency-Workforce-Development-FINAL-REPORT-CAREER-PROFILES.pdf . Data from the needs assessment can be used to target future workforce development strategies, with diversity and upskilling of a diverse workforce as major areas of focus.	Still pending. Will begin shortly.
	2. Continue the lead vendor collaboration with the RI Builders Association, and their affiliate Residential Construction Workforce Partnership, to complete at least two additional Energy Efficiency Program related trainings in 2022. RI Builders Association will report participant demographic information to the Company from the September 2021 training. If necessary, the Company will assist in the targeted recruitment of more diverse trainees for 2022. During 2022, the Company and/or its vendors will also collaborate with the RI Dept of Human Services (DHS) on workforce development efforts from U.S. Department of Energy training funds. RI DHS will also report participant demographic information to the Company, so the Company can assist in the targeted recruitment of more diverse trainees, if necessary.	Completed first cohort. 6 hires EE partners with 2 more hires pending. Funding needs to be secured for second cohort.

Determination of Success	<ol style="list-style-type: none"> 1. Completion of a RI workforce development needs assessment by December 2022. 2. Collaboration with the RI Builders Association on two additional trainings in 2022. 3. Completion of recruitment assistance to RI Builders Association and RI DHS, if necessary.
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C-Team Comments

- Commitment 13.1 appears to have been delayed with no specific indication given as to the reason. It appears likely that the workforce development needs assessment will not be completed in time for the deadline of December 2022 contained in Determination of Success 13.1.
 - o Note that this determination of success is better than many others, in that it includes a specific due date.
- Commitment 13.2 is partially addressed in the Q2 update. This commitment should almost certainly be broken out into several related commitments to enable better tracking. An illustration of this approach is below:
 - o 13.2.1 Continue the lead vendor collaboration with the RI Builders Association, and their affiliate Residential Construction Workforce Partnership, to complete at least two additional Energy Efficiency Program related trainings in 2022.
 - It appears that one training is complete, but funding is lacking for the second training. Commitment 13.2.1 is therefore on track for partial success in 2022.
 - o 13.2.2 RI Builders Association will report participant demographic information to the Company from the September 2021 training. If necessary, the Company will assist in the targeted recruitment of more diverse trainees for 2022.
 - No information is provided regarding commitment 13.2.2. Specifically, there is no indication regarding whether demographic information was reported, or what that information showed regarding the diversity of training participants.
 - It is also unclear how a determination would be made from such data regarding the 'if necessary' component of assisting in targeted recruitment of more diverse trainees. How would a determination be made about whether this is necessary?
 - Metrics and targets are needed to support this goal, such as those included in recent MA efficiency planning: "Over the three-year term, at least 120 people will complete training and be placed in relevant industry positions through Clean Energy Pathways, with at least 90 people being Women, Black, Indigenous, or People of Color, fluent in language(s) other than English, and/or from EJ block groups at time of enrollment."²

² Massachusetts Joint Statewide Electric and Gas Three-Year Energy Efficiency Plan for 2022-2024: Attachment B (Equity Frameworks and Targets): <https://ma-eeac.org/wp-content/uploads/Attachment-B-Equity-Targets-Framework-Final.pdf>

- 13.2.3 During 2022, the Company and/or its vendors will also collaborate with the RI Department of Human Services (DHS) on workforce development efforts from U.S. Department of Energy training funds.
 - No information is provided regarding this commitment or its current status. It is also unclear what efforts DHS is undertaking and how RI Energy would be involved or be supportive. This commitment lacks the clarity and specificity needed to inform a possible future determination of success.
- 13.2.4 RI DHS will also report participant demographic information to the Company, so the Company can assist in the targeted recruitment of more diverse trainees, if necessary.
 - Same concerns present here as noted above regarding the absence of any information regarding the planned reporting, how it will be used, and how it will be decided if targeted recruitment is necessary.
- Stepping back from the specifics, it is not at all clear that conducting a study and continuing existing training collaborations will meaningfully impact the EWG recommendation to reduce barriers to professional development, as well as entry into the energy efficiency workforce. These commitments appear to be largely continuation of existing training efforts, and the commitment to engage in targeted recruiting is characterized as a possible future action that is contingent on reporting that has not been provided using a decision criterion that has also not been provided. Further, no targets for attendance, content, length, diversity of participants, or any other relevant metric for these trainings have been established, so determination of success is not well defined.
- Overall, it appears that only a small portion of the actions contained in the two commitments have taken place, and none of the associated reporting of participant demographics or targeted recruiting has been addressed at all in this update. **Consequently, this recommendation is not on track for success in 2022.**

14. Collaborate with local diverse community organizations to train and certify potential workers (Progreso Latino, Hispanic chamber of commerce, Cape Verdean community development).		
Current Activity	The Company and its vendors currently collaborate with entities such as Skills for RI's Future; the University of RI's Energy Fellows program; and the RI Builders Association and their affiliate Residential Construction Workforce Partnership, for workforce development and training. Vendors and contractors also complete additional on-the-job training for upskilling.	
2022 Commitments and Status	See recommendation 13. The new workforce development needs assessment, as well as demographic reporting from the new trainings will help to determine whether new recruitment and upskilling efforts with a focus on diversity are necessary.	Still pending. Will hopefully start shortly.
Determination of Success	N/A	

C-Team Comments

- Commitment does not sufficiently address point of the recommendation. Recommendation provided specific examples of community organizations that would support training and certifying diverse workforce members, but commitment appears to assert that current partners are likely sufficient to meet this need.
- The workforce development needs assessment is a legitimate, related action. However, it does not follow that pursuing new community partnerships must be put on hold until that study is complete. The MA study that it is intended to build upon includes a specific recommendation to “identify disadvantaged or high unemployment communities and provide them with access to training and career pipelines”. There is no reason to expect this recommendation to not apply in Rhode Island, so there is no reason to delay community partnership development until study is complete.
 - o It is also unsatisfactory to say that a commitment will ‘hopefully start shortly’. There needs to be clarity on expected start date, availability of study results, and strategy for implementing lessons learned from the study.
- The sole supporting commitment for this recommendation has been delayed without adequate justification, so **the recommendation is not on track for success in 2022.**