



STATE OF RHODE ISLAND

**ENERGY EFFICIENCY &  
RESOURCE MANAGEMENT COUNCIL**

CONSULTANT TEAM

# 2024-2026 Energy Efficiency Plan EERMC Consultant Team Review

**Presented By:** EERMC Consultant Team

**Date:** September 28, 2023



# Outline

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Overview & Key Findings

Portfolio Savings & Budgets

Sector Highlights

Council Discussion & Vote



# OVERVIEW





# Overview & Key Findings

Overall, the Three-Year Plan:

- Is robustly cost-effective
- Costs less than buying more energy supply
- Lowers energy bills for Rhode Islanders

2024 savings & budgets presented as what RIE can confidently deliver

- While understandable in the short term, implementation capacity should not constrain the breadth or quality of EE programs
- Should maximize benefits these programs produce for Rhode Islanders
- Critical need to continue detailed planning work for 2025 and 2026
  - Annual Plans will certainly deviate from Three-Year Plan values



# Overview & Key Findings

Proposed roadmap to develop and include an equity-based Service Quality Adjustment in the EE PIM was not adopted by RIE

RIE has engaged in continued conversation & agreed to develop list of equity metrics from EWG recommendations that they are currently able to report on, or are feasible to develop in near term

This will facilitate gathering baseline data in 2024 on available equity metrics, a long-standing Council and Stakeholder request



Plan is Responsive to Council Priority



Plan is Partially Responsive to Council Priority



Plan is Not Responsive to Council Priority

# Council Priorities

Council EE Priorities		Assessment
Priority #1	Comply with LCP Standards	✓
Priority #2	Give Due Consideration to Act on Climate	■ ■ ■
Priority #3	Incorporate Stakeholder Input	✓
Priority #4	Ensure an Effective & Efficient Development & Review Process	■ ■ ■
Priority #5	Set Ambitious Three-Year and Annual Plan Savings Goals	■ ■ ■
Priority #6	Increase Participation in Underserved Communities	■ ■ ■
Priority #7	Conduct Targeted Workforce Development	✗

- RIE **edited or clarified** in response to several relevant C-Team comments in 2<sup>nd</sup> draft & recent conversations
- Area of Council priority on savings level (i.e. **all cost-effective savings**) **addressed in Priority #5**, so not emphasized in assessment here

- 3YP **Goals fall well below targets**
- Qualitative comparison explaining gap helpful, but quantitative assessment expected in future plans
- Councilor discussions & RIE comments have emphasized ability to **respond to this priority through incremental savings in 2025 & 2026**

*More Details in Appendix!* 6

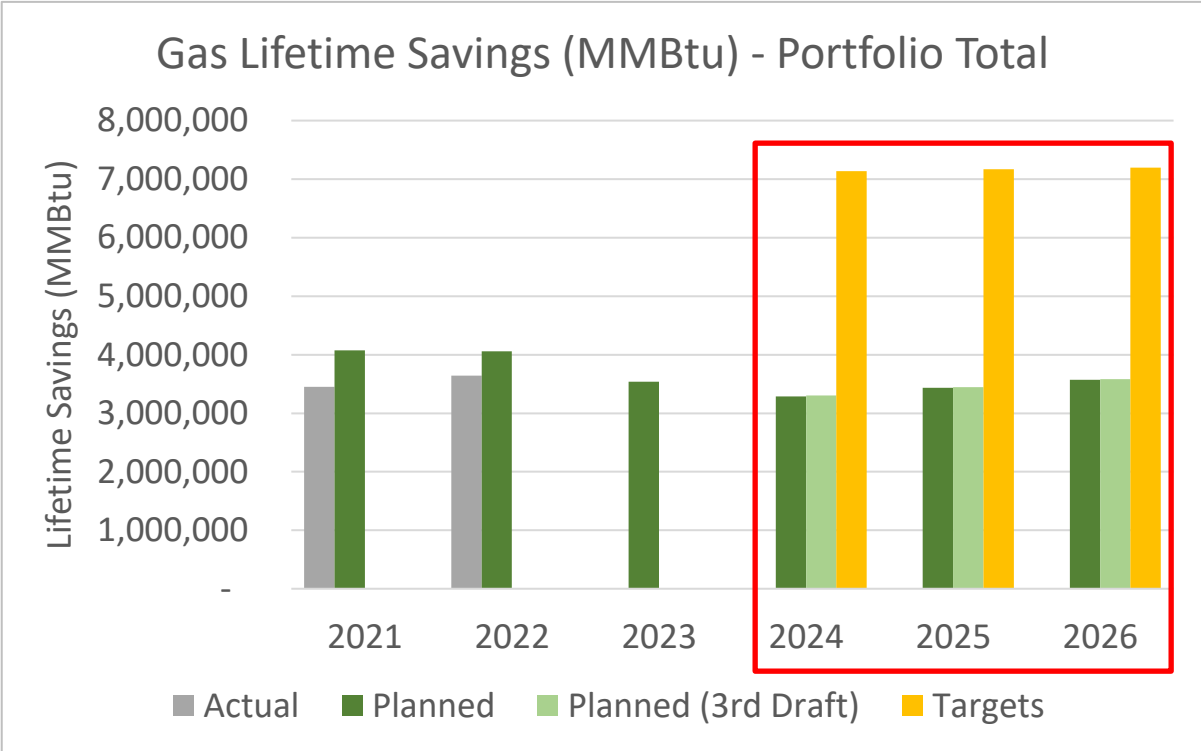
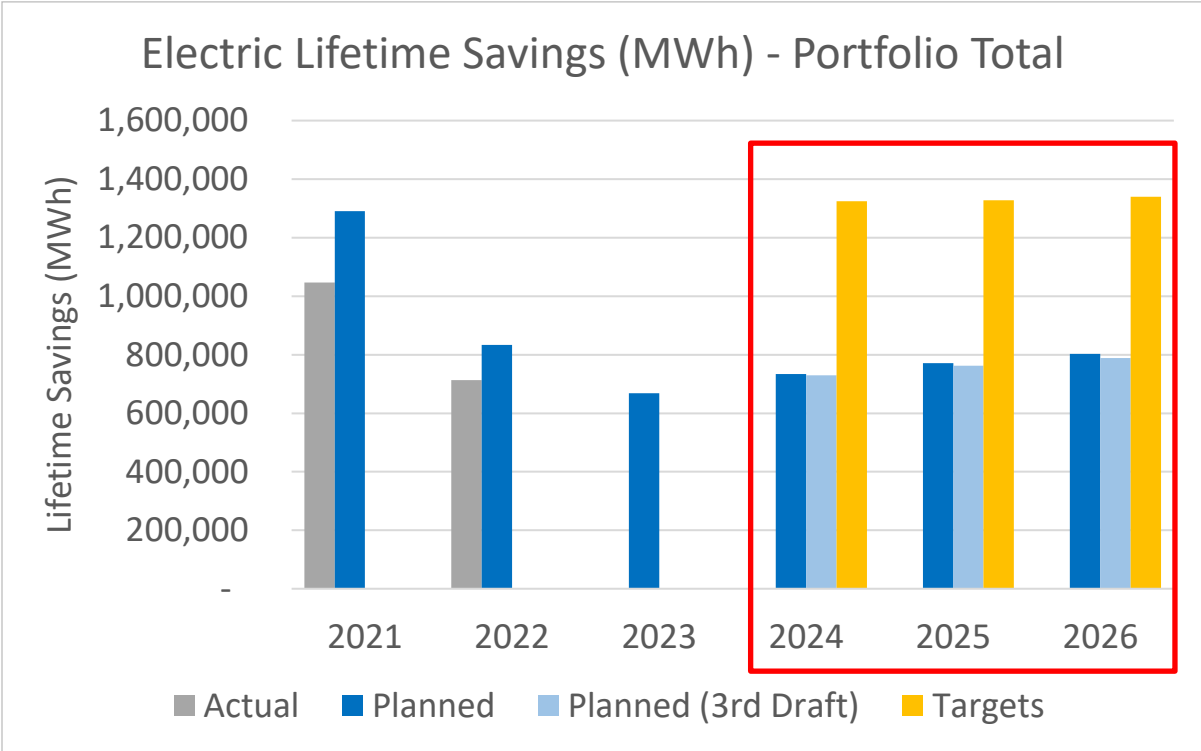


# PORTFOLIO SAVINGS & BUDGETS



# Portfolio Lifetime Savings

**Key Takeaway** 2024-2026 planned lifetime electric savings higher than 2023 Plan and both portfolio savings increasing over time, but ~40% short of EERMC-recommended targets

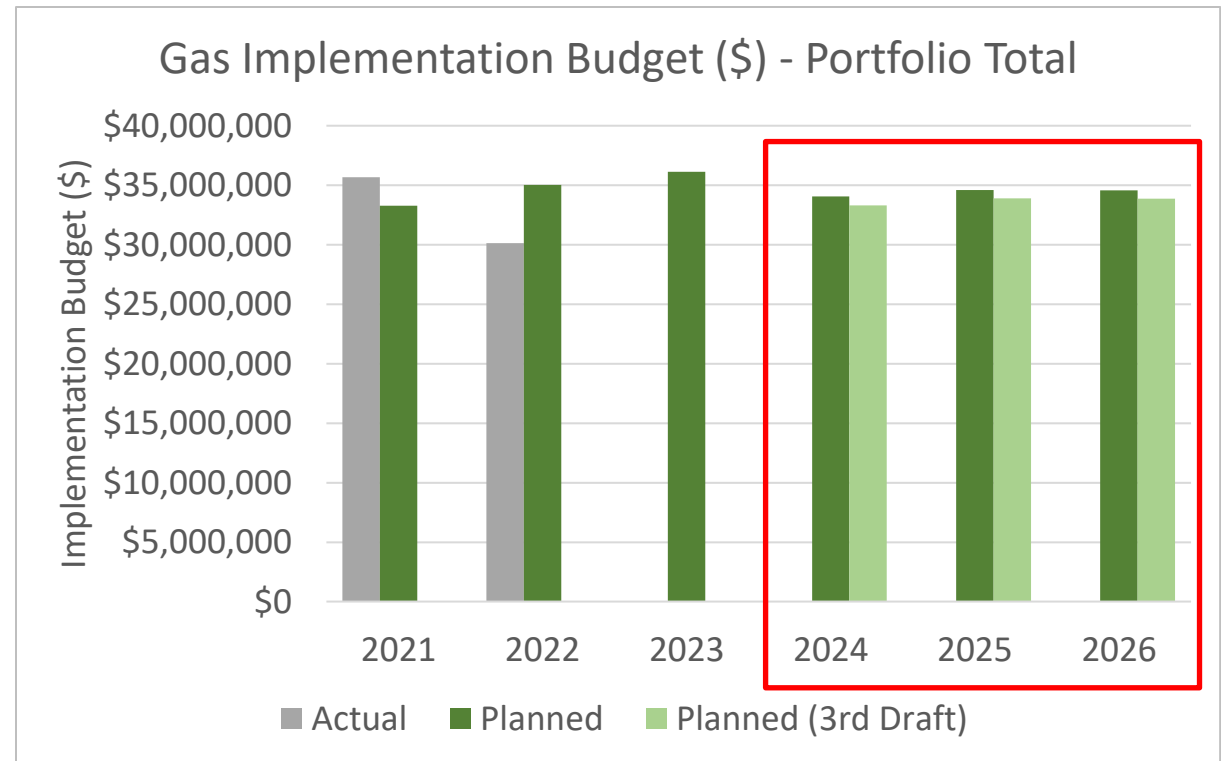
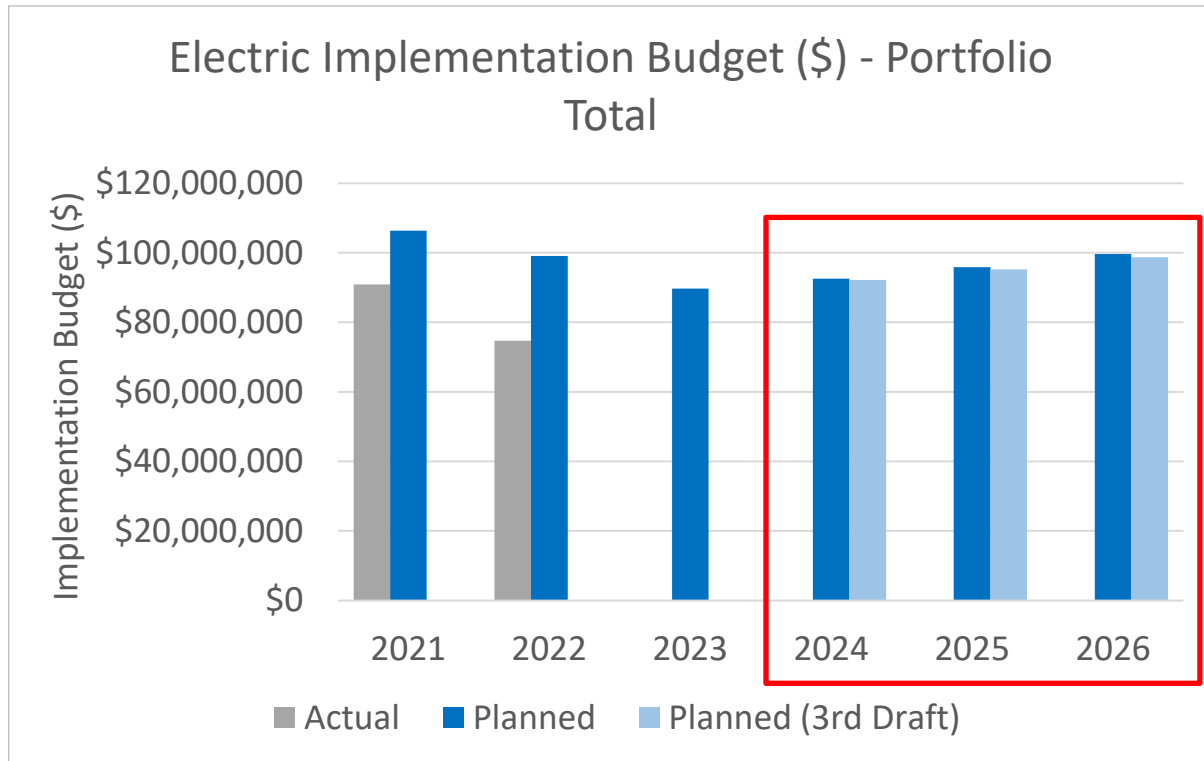






# Portfolio Implementation Budget

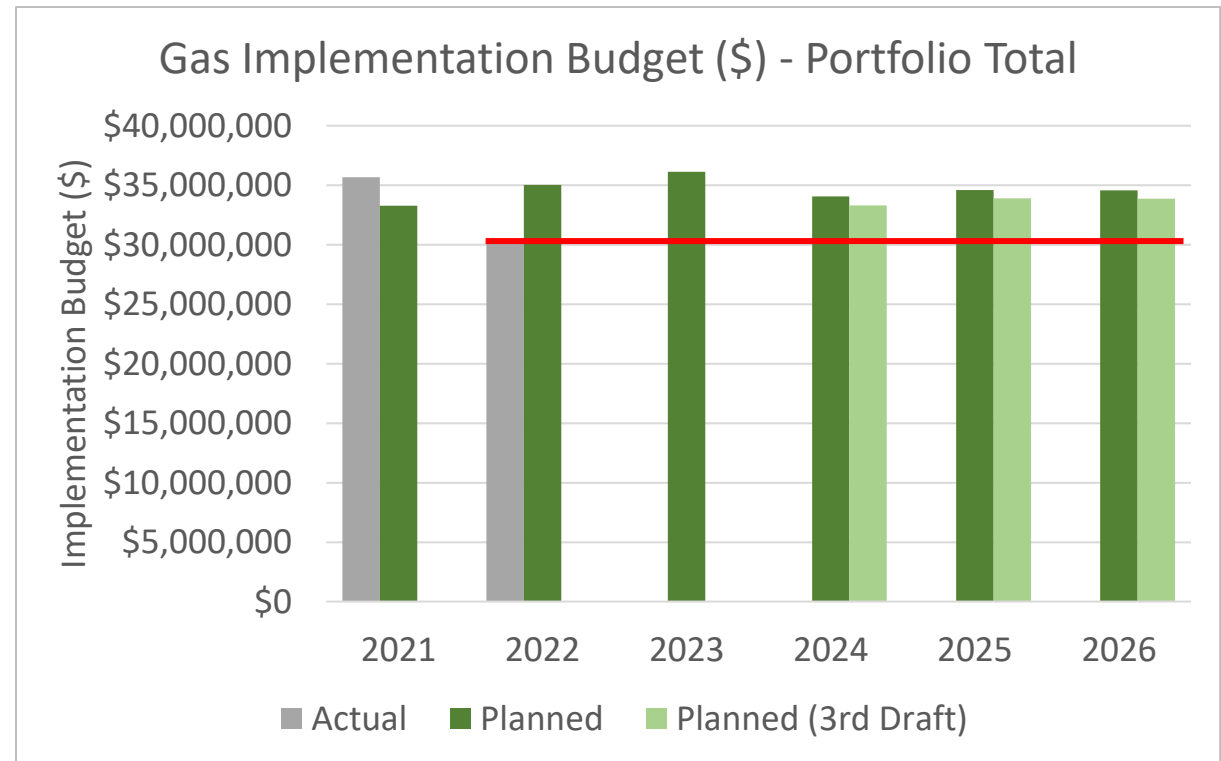
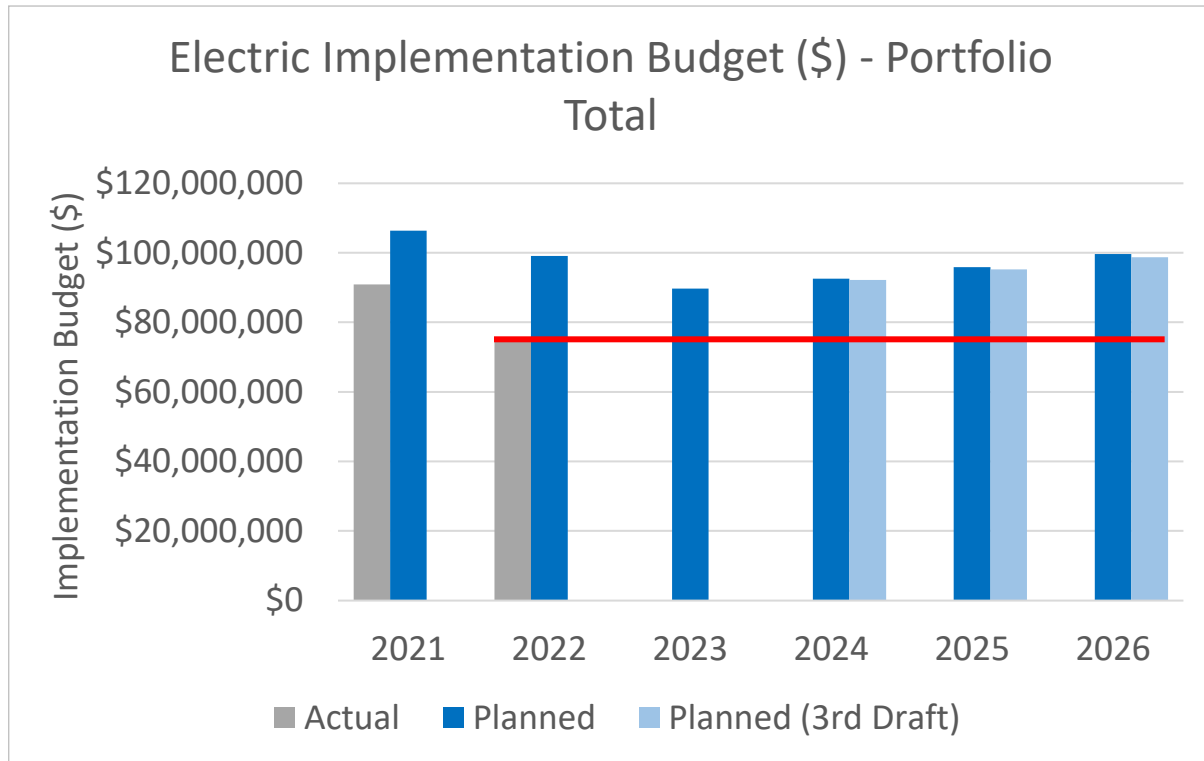
**Key Takeaway** Decrease in total 2024-2026 electric and gas budgets between Plan drafts. 2024-2026 Portfolio implementation budgets higher than 2022 actuals.





# Portfolio Implementation Budget

**Key Takeaway** Decrease in total 2024-2026 electric and gas budgets between Plan drafts. **2024-2026 Portfolio implementation budgets higher than 2022 actuals.**





# SECTOR HIGHLIGHTS





# Commercial & Industrial

Previous concern regarding lack of references to the Market Potential Study Refresh in detailed C&I program content not sufficiently addressed

- Council has requested **explanations of gaps beyond unconstrained budget of MPS Refresh**

Great to see the planned **demonstration for C&I Weatherization**. Programs need to continue to support savings across all end uses

- “Residential-style” small businesses have been targeted since late 2021 and provided insights into costs of delivering C&I weatherization services
- Requested that the Company also target electric resistance heat in C&I sector

Lack of **workforce diversification is raised as a long-term challenge**, but explicit solutions and desired outcomes are not discussed

- Community College of RI and Worcester Polytechnic Institute will launch hands-on industrial assessment training for students, which will adhere to Justice40 guidelines
- Additional code compliance trainings planned, but workforce development efforts appear to be “business-as-usual” **without thoughtful strategies to diversify while upskilling**



# Residential & Income Eligible

## Income Eligible & Multifamily

- Testing new solutions for addressing historically underserved customers (e.g. Engaging with community organizations to improve customer education)
- More specificity around long-term plans and expected outcomes needed

## Gas Equipment

- Significant reduction or entire removal of incentives for gas equipment – especially for those that are not cost-effective

## Heating and Hot Water Electrification

- Commitment to emphasize electric resistance conversions in both Residential and Income Eligible Programs

## New Construction

- Moving in the right direction towards Net Zero Energy
- Commitment to evaluate program redesign options



# SUMMARY AND COUNCIL VOTE





# Summary and Recommendations

2024-2026 Plan sufficiently meets all requirements & primary objectives

- 1 Electric and Gas Programs are Cost-Effective
- 2 Portfolio Costs are less than the cost of supply
- 3 Addresses issues of Prudence & Reliability
- 4 Aligns with Least Cost Procurement Standards
- 5 Reflects responsiveness to EERMC and Stakeholder Priorities





# Council's Responsibility

EERMC role and responsibility in potentially endorsing the Plans as described in the LCP Standards:

“

The Council shall vote whether to endorse the Three-Year Plan prior to the prescribed filing date. If the Council does not endorse the Three-Year, the Council shall document the reasons and submit comments on the Three-Year EE Plan to the PUC for their consideration in final review of the Three-Year EE Plan.

”



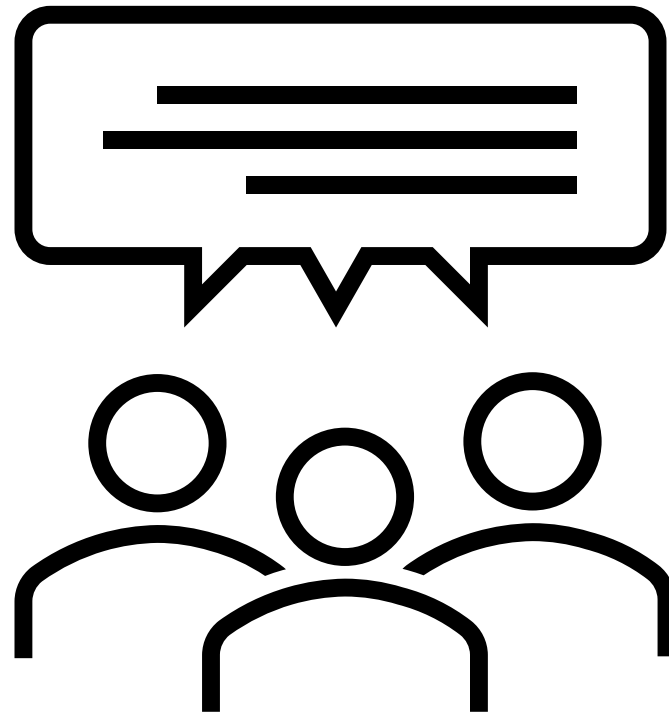


# Summary of Plan Vote Options

1. **Endorse the Three-Year EE Plan.** Endorsement may also list Council's concerns that didn't prevent endorsement but warrant mentioning in the Plan Docket.
2. **Endorse the Three-Year EE Plan,** but decline to join any Settlement of the Parties. Represents a strong statement of the EERMC's concerns.
3. **Not endorse the Three-Year EE Plan,** but indicate that if specific condition(s) are met it would be endorsed.
4. **Not endorse the Three-Year EE Plan,** and provide a list of reasons why it was not endorsed for PUC consideration in its final review of the Three-Year EE Plan.



# Council Member Discussion





# APPENDICES





# APPENDICIES

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**Appendix A:** Additional Portfolio and Program Savings and Spending Data

**Appendix B:** Responsiveness to Council Priorities



Additional Portfolio and Program Savings and Spending Data

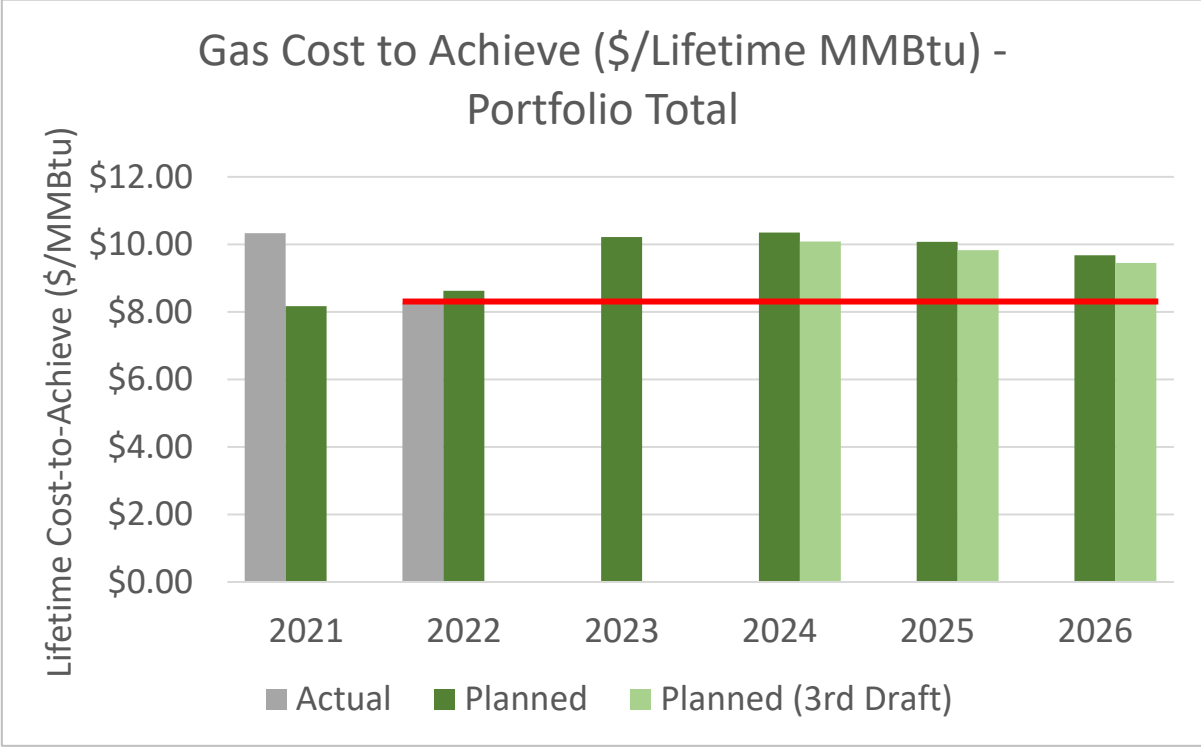
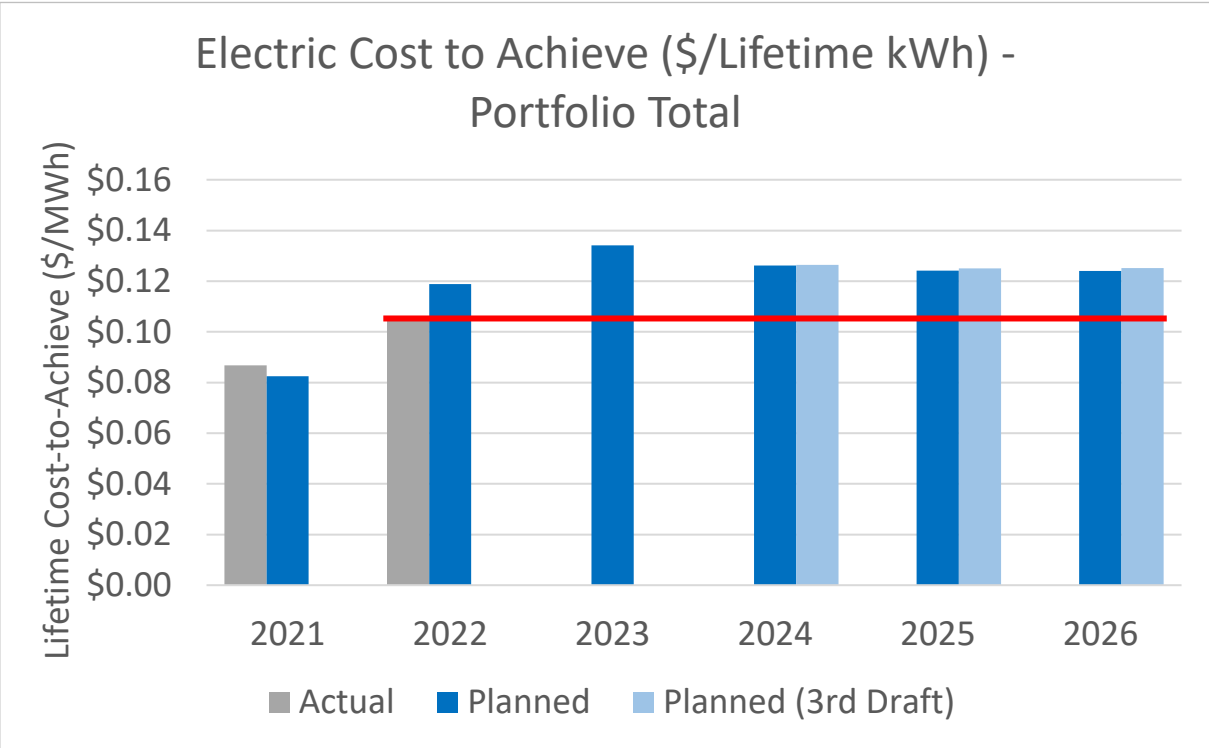
# APPENDIX A





# Portfolio Cost to Achieve

**Key Takeaway** Average planned **lifetime cost-to-achieve** for 2024-2026 is ~20% higher than 2022 **actuals** for both the electric and gas portfolios.

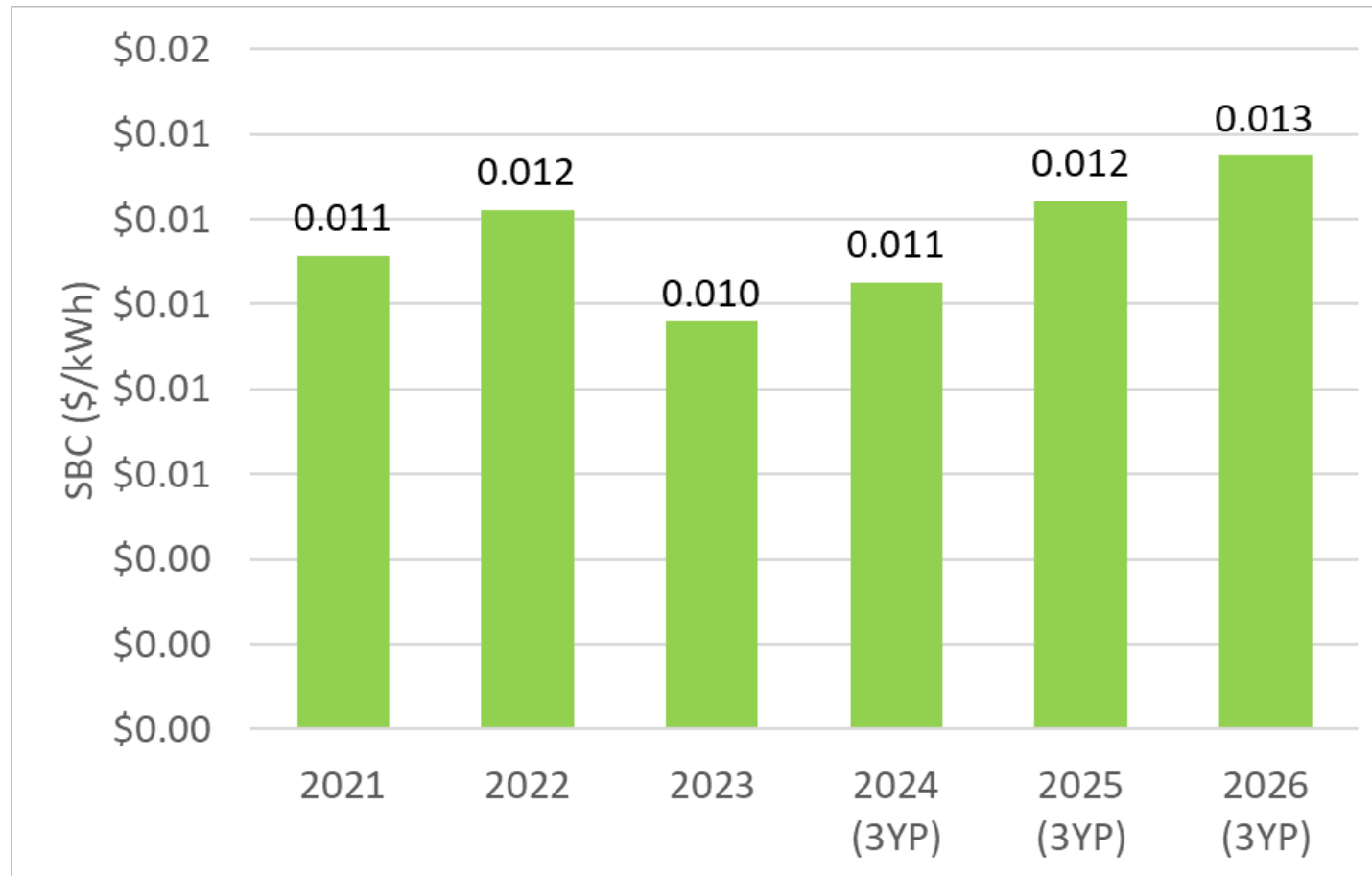




# Electric System Benefits Charge

## Key Takeaway

Electric SBC higher than in 2023 and increasing during 2024-2026

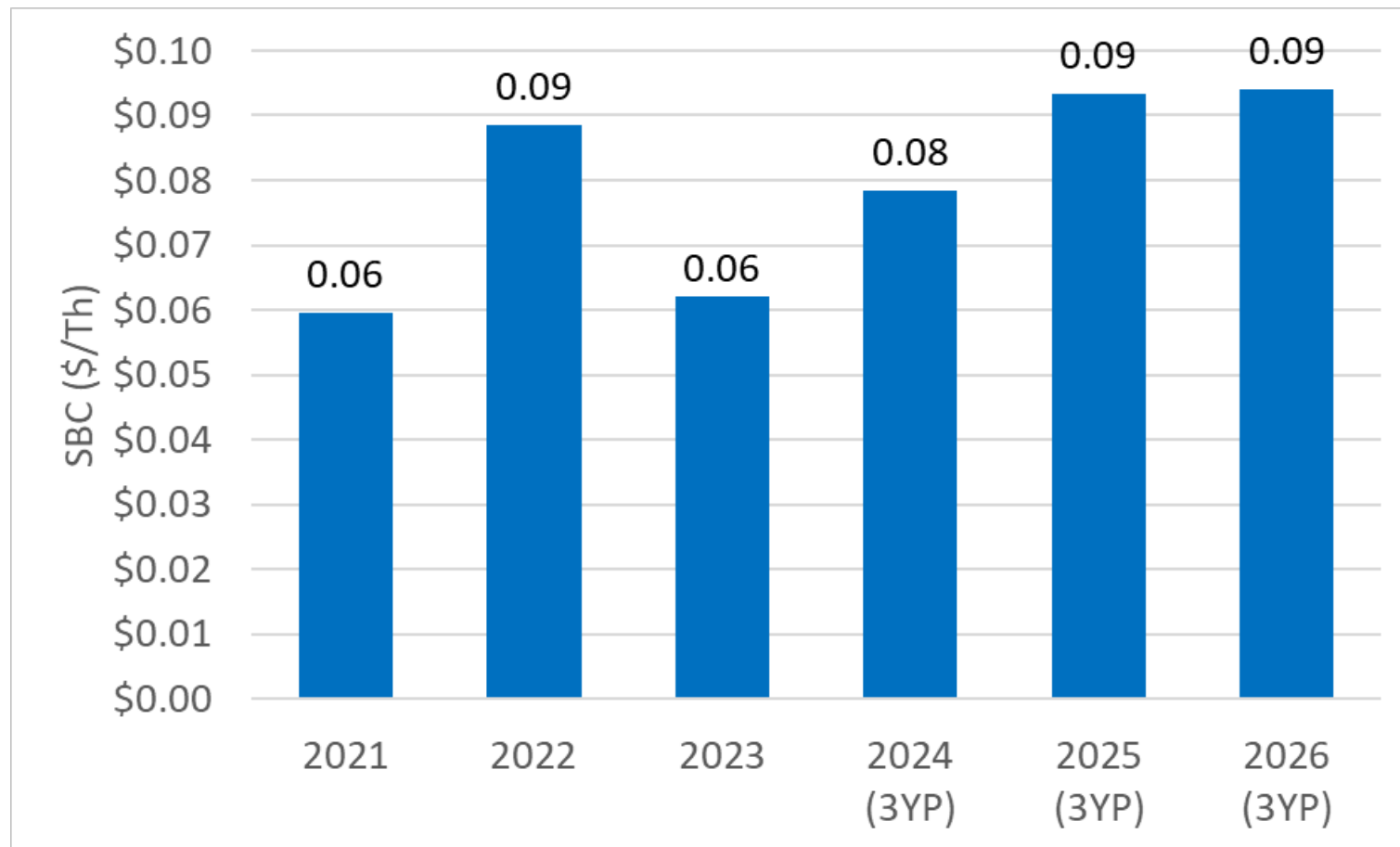




# C&I Gas System Benefits Charge

## Key Takeaway

C&I Gas SBC higher than in 2023 and increasing during 2024-2026



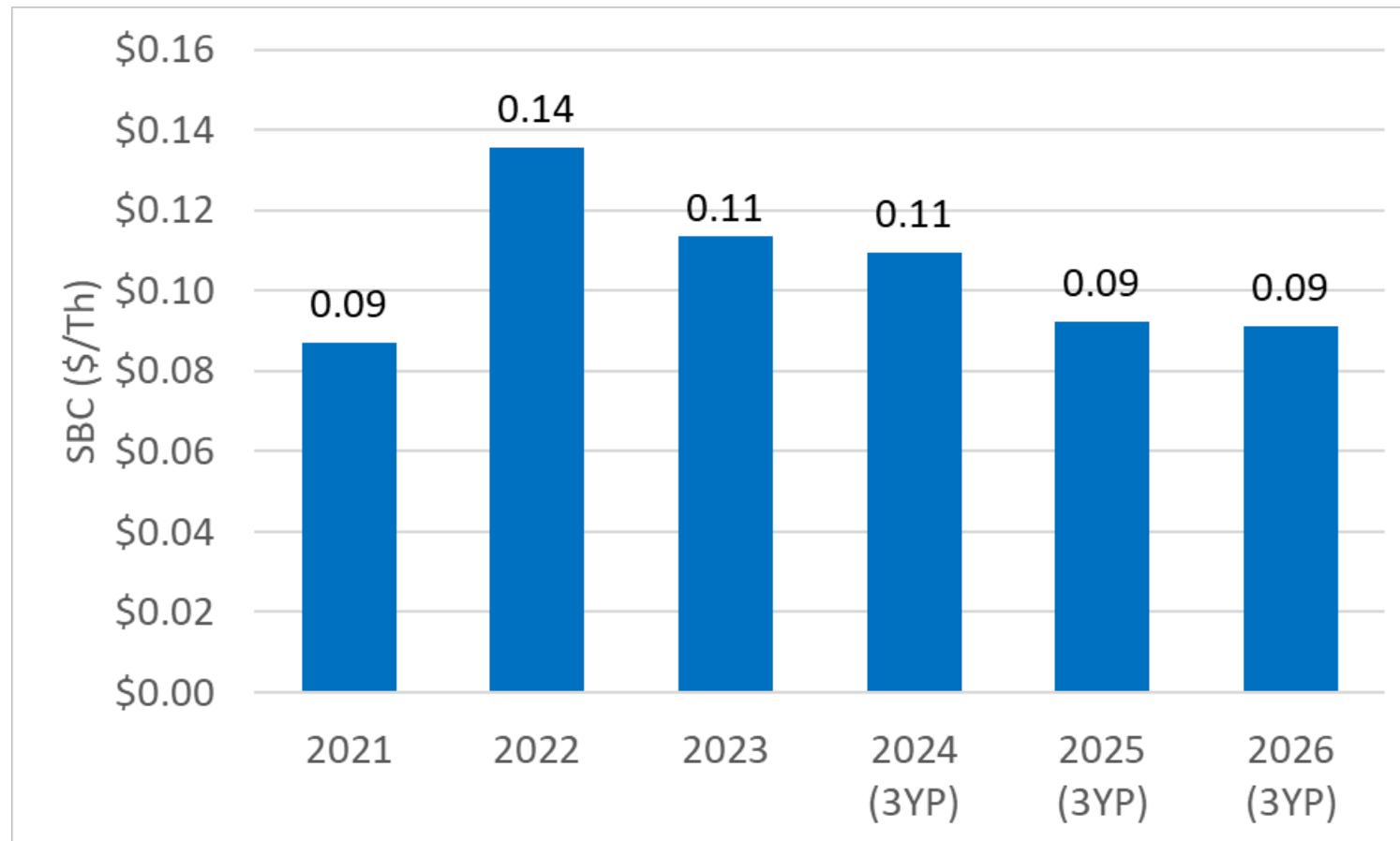




# Residential Gas System Benefits Charge

## Key Takeaway

Residential Gas SBC lower than in 2023 and decreasing during 2024-2026





# Electric Portfolio Savings

## LIFETIME MWhs

Program	2024 Three-Year Plan (Third Draft)	2025 Three-Year Plan (Third Draft)	2026 Three-Year Plan (Third Draft)	2024 Three-Year Plan (Third Draft) Compared to 2024 Three-Year Plan (Second Draft)		2025 Three-Year Plan (Third Draft) Compared to 2025 Three-Year Plan (Second Draft)		2026 Three-Year Plan (Third Draft) Compared to 2026 Three-Year Plan (Second Draft)	
Small Business Direct Install	58,008	61,837	64,684	0	0%	0	0%	0	0%
Large C&I New Construction	182,346	189,935	198,022	0	0%	0	0%	-95	0%
Large C&I Retrofit	242,966	244,390	251,876	-5,620	-2%	-9,915	-4%	-13,078	-5%
<b>C&amp;I Total</b>	<b>483,319</b>	<b>496,161</b>	<b>514,583</b>	<b>-5,620</b>	<b>-1%</b>	<b>-9,915</b>	<b>-2%</b>	<b>-13,173</b>	<b>-2%</b>
Income Eligible Single Family	36,840	46,970	48,507	0	0%	-1,429	-3%	-1,113	-2%
Income Eligible Multifamily	18,518	13,435	10,055	-655	-3%	495	4%	405	4%
<b>Income Eligible Total</b>	<b>55,358</b>	<b>60,406</b>	<b>58,562</b>	<b>-655</b>	<b>-1%</b>	<b>-935</b>	<b>-2%</b>	<b>-708</b>	<b>-1%</b>
Residential New Construction	15,904	17,174	18,495	1,966	14%	1,987	13%	1,959	12%
Residential HVAC	112,919	126,046	134,654	1,559	1%	2,051	2%	376	0%
EnergyWise Single Family	14,991	15,911	17,445	0	0%	0	0%	0	0%
EnergyWise Multifamily	8,122	7,120	6,336	-163	-2%	1	0%	0	0%
Home Energy Reports	23,359	23,359	22,424	0	0%	0	0%	0	0%
ENERGY STAR® Lighting	0	0	0	0		0		0	
Residential Consumer Products	15,323	15,800	16,283	-1,625	-10%	-2,967	-16%	-3,049	-16%
<b>Residential Total</b>	<b>190,617</b>	<b>205,409</b>	<b>215,638</b>	<b>1,737</b>	<b>1%</b>	<b>1,072</b>	<b>1%</b>	<b>-714</b>	<b>0%</b>
<b>Residential &amp; Income Eligible Total</b>	<b>245,975</b>	<b>265,815</b>	<b>274,200</b>	<b>1,082</b>	<b>0%</b>	<b>137</b>	<b>0%</b>	<b>-1,422</b>	<b>-1%</b>
<b>Portfolio Total</b>	<b>729,294</b>	<b>761,976</b>	<b>788,783</b>	<b>-4,538</b>	<b>-1%</b>	<b>-9,777</b>	<b>-1%</b>	<b>-14,595</b>	<b>-2%</b>



# Electric Portfolio Implementation Budget

## IMPLEMENTATION BUDGET

Program	2024 Three-Year Plan (Third Draft)	2025 Three-Year Plan (Third Draft)	2026 Three-Year Plan (Third Draft)	2024 Three-Year Plan (Third Draft) Compared to 2024 Three-Year Plan (Second Draft)		2025 Three-Year Plan (Third Draft) Compared to 2025 Three-Year Plan (Second Draft)		2026 Three-Year Plan (Third Draft) Compared to 2026 Three-Year Plan (Second Draft)	
Small Business Direct Install	\$8,199,942	\$8,574,150	\$8,953,227	\$6,154	0%	\$6,329	0%	\$6,762	0%
Large C&I New Construction	\$9,227,180	\$9,745,064	\$10,292,653	\$495	0%	\$665	0%	\$1,094	0%
Large C&I Retrofit	\$22,797,878	\$23,515,223	\$24,289,402	-\$436,303	-2%	-\$808,547	-3%	-\$1,131,412	-4%
C&I Financing	\$0	\$0	\$0	\$0		\$0		\$0	
Community Based Initiatives - C&I	\$57,914	\$59,461	\$61,051	\$0	0%	\$0	0%	\$0	0%
Commercial Pilots	\$0	\$0	\$0	\$0		\$0		\$0	
C&I ConnectedSolutions				\$0		\$0		\$0	
Commercial Workforce Development	\$74,900	\$74,900	\$74,900	\$0	0%	\$0	0%	\$0	0%
<b>C&amp;I Total</b>	<b>\$40,357,814</b>	<b>\$41,968,799</b>	<b>\$43,671,233</b>	<b>-\$429,654</b>	<b>-1%</b>	<b>-\$801,553</b>	<b>-2%</b>	<b>-\$1,123,556</b>	<b>-3%</b>
Income Eligible Single Family	\$12,237,390	\$13,114,153	\$13,535,276	\$8,581	0%	\$8,756	0%	\$9,265	0%
Income Eligible Multifamily	\$3,784,189	\$2,668,011	\$2,119,719	\$62,226	2%	\$190,973	8%	\$184,406	10%
Income Eligible Workforce Development	\$0	\$0	\$0	\$0		\$0		\$0	
<b>Income Eligible Total</b>	<b>\$16,021,579</b>	<b>\$15,782,165</b>	<b>\$15,654,994</b>	<b>\$70,808</b>	<b>0%</b>	<b>\$199,729</b>	<b>1%</b>	<b>\$193,671</b>	<b>1%</b>
Residential New Construction	\$1,312,727	\$1,498,766	\$1,720,592	\$2,254	0%	\$2,275	0%	\$2,340	0%
Residential HVAC	\$6,563,597	\$7,082,257	\$7,524,130	\$31,151	0%	\$40,676	1%	\$16,938	0%
EnergyWise Single Family	\$16,277,686	\$17,022,632	\$18,105,667	\$7,069	0%	\$7,302	0%	\$8,077	0%
EnergyWise Multifamily	\$1,291,901	\$1,195,557	\$1,108,898	\$76,745	6%	\$79,487	7%	\$75,622	7%
Home Energy Reports	\$2,123,264	\$2,122,104	\$2,120,981	\$8,738	0%	\$8,738	0%	\$8,738	0%
ENERGY STAR® Lighting	\$0	\$0	\$0	\$0		\$0		\$0	
Residential Consumer Products	\$1,987,426	\$2,033,549	\$2,077,960	-\$102,553	-5%	-\$94,871	-4%	-\$97,288	-4%
Energy Efficiency Education	\$0	\$0	\$0	\$0		\$0		\$0	
Comprehensive Marketing - Residential	\$326,506	\$336,254	\$346,295	\$0	0%	\$0	0%	\$0	0%
Community Based Initiatives - Residential	\$139,402	\$143,585	\$147,892	\$0	0%	\$0	0%	\$0	0%
Residential ConnectedSolutions				\$0		\$0		\$0	
Residential Pilots	\$0	\$0	\$0	\$0		\$0		\$0	
Residential Workforce Development	\$0	\$0	\$0	\$0		\$0		\$0	
<b>Residential Total</b>	<b>\$30,022,508</b>	<b>\$31,434,705</b>	<b>\$33,152,416</b>	<b>\$23,405</b>	<b>0%</b>	<b>\$43,607</b>	<b>0%</b>	<b>\$14,427</b>	<b>0%</b>
<b>Residential &amp; Income Eligible Total</b>	<b>\$46,044,087</b>	<b>\$47,216,869</b>	<b>\$48,807,410</b>	<b>\$94,213</b>	<b>0%</b>	<b>\$243,336</b>	<b>1%</b>	<b>\$208,098</b>	<b>0%</b>
EERMC	\$702,267	\$702,267	\$702,267	\$0	0%	\$0	0%	\$0	0%
OER	\$1,386,417	\$1,646,666	\$1,790,537	\$0	0%	\$0	0%	\$0	0%
Rhode Island Infrastructure Bank	\$3,737,500	\$3,737,500	\$3,737,500	\$0	0%	\$0	0%	\$0	0%
<b>Regulatory Total</b>	<b>\$5,826,185</b>	<b>\$6,086,433</b>	<b>\$6,230,304</b>	<b>\$0</b>	<b>0%</b>	<b>\$0</b>	<b>0%</b>	<b>\$0</b>	<b>0%</b>
<b>Portfolio Total</b>	<b>\$92,228,085</b>	<b>\$95,272,101</b>	<b>\$98,708,947</b>	<b>-\$335,442</b>	<b>0%</b>	<b>-\$558,217</b>	<b>-1%</b>	<b>-\$915,458</b>	<b>-1%</b>



# Electric Portfolio Cost-to-Achieve

## \$/LIFETIME kWh

Program	2024 Three-Year Plan (Third Draft)	2025 Three-Year Plan (Third Draft)	2026 Three-Year Plan (Third Draft)	2024 Three-Year Plan (Third Draft) Compared to 2024 Three-Year Plan (Second Draft)		2025 Three-Year Plan (Third Draft) Compared to 2025 Three-Year Plan (Second Draft)		2026 Three-Year Plan (Third Draft) Compared to 2026 Three-Year Plan (Second Draft)	
				\$	%	\$	%	\$	%
Small Business Direct Install	\$0.14	\$0.14	\$0.14	\$0.00	0%	\$0.00	0%	\$0.00	0%
Large C&I New Construction	\$0.05	\$0.05	\$0.05	\$0.00	0%	\$0.00	0%	\$0.00	0%
Large C&I Retrofit	\$0.09	\$0.10	\$0.10	\$0.00	0%	\$0.00	1%	\$0.00	1%
<b>C&amp;I Total</b>	<b>\$0.08</b>	<b>\$0.08</b>	<b>\$0.08</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>0%</b>
Income Eligible Single Family	\$0.33	\$0.28	\$0.28	\$0.00	0%	\$0.01	3%	\$0.01	2%
Income Eligible Multifamily	\$0.20	\$0.20	\$0.21	\$0.01	5%	\$0.01	4%	\$0.01	5%
<b>Income Eligible Total</b>	<b>\$0.29</b>	<b>\$0.26</b>	<b>\$0.27</b>	<b>\$0.00</b>	<b>2%</b>	<b>\$0.01</b>	<b>3%</b>	<b>\$0.01</b>	<b>2%</b>
Residential New Construction	\$0.08	\$0.09	\$0.09	-\$0.01	-12%	-\$0.01	-11%	-\$0.01	-10%
Residential HVAC	\$0.06	\$0.06	\$0.06	\$0.00	-1%	\$0.00	-1%	\$0.00	0%
EnergyWise Single Family	\$1.09	\$1.07	\$1.04	\$0.00	0%	\$0.00	0%	\$0.00	0%
EnergyWise Multifamily	\$0.16	\$0.17	\$0.18	\$0.01	8%	\$0.01	7%	\$0.01	7%
Home Energy Reports	\$0.09	\$0.09	\$0.09	\$0.00	0%	\$0.00	0%	\$0.00	0%
ENERGY STAR® Lighting				\$0.00		\$0.00		\$0.00	
Residential Consumer Products	\$0.13	\$0.13	\$0.13	\$0.01	5%	\$0.02	13%	\$0.02	13%
<b>Residential Total</b>	<b>\$0.16</b>	<b>\$0.15</b>	<b>\$0.15</b>	<b>\$0.00</b>	<b>-1%</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>0%</b>
<b>Residential &amp; Income Eligible Total</b>	<b>\$0.19</b>	<b>\$0.18</b>	<b>\$0.18</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>1%</b>
<b>Portfolio Total</b>	<b>\$0.13</b>	<b>\$0.13</b>	<b>\$0.13</b>	<b>\$0.00</b>	<b>0%</b>	<b>\$0.00</b>	<b>1%</b>	<b>\$0.00</b>	<b>1%</b>





# Gas Implementation Budget

## IMPLEMENTATION BUDGET

Program	2024 Three-Year Plan (Third Draft)	2025 Three-Year Plan (Third Draft)	2026 Three-Year Plan (Third Draft)	2024 Three-Year Plan (Third Draft) Compared to 2024 Three-Year Plan		2025 Three-Year Plan (Third Draft) Compared to 2025 Three-Year Plan (Second Draft)		2026 Three-Year Plan (Third Draft) Compared to 2026 Three-Year Plan	
Large C&I New Construction	\$2,125,417	\$2,211,456	\$2,322,696	\$773	0%	\$646	0%	\$651	0%
Large C&I Retrofit	\$4,476,716	\$4,669,879	\$4,954,412	\$1,401	0%	\$1,078	0%	\$1,118	0%
Small Business Direct Install	\$757,394	\$763,996	\$787,667	\$632	0%	\$557	0%	\$549	0%
C&I Multifamily	\$879,874	\$827,762	\$777,627	-\$749,552	-46%	-\$732,349	-47%	-\$717,663	-48%
Comprehensive Marketing - Commercial and Industrial	\$0	\$0	\$0	\$0		\$0		\$0	
Commercial Pilots	\$0	\$0	\$0	\$0		\$0		\$0	
Finance Costs	\$0	\$0	\$0	\$0		\$0		\$0	
Community Based Initiatives - C&I	\$3,699	\$3,749	\$3,799	\$0	0%	\$0	0%	\$0	0%
Rhode Island Infrastructure Bank	\$1,262,500	\$1,262,500	\$1,262,500	\$0	0%	\$0	0%	\$0	0%
Commercial Workforce Development	\$32,100	\$32,100	\$32,100	\$0	0%	\$0	0%	\$0	0%
<b>C&amp;I Total</b>	<b>\$9,537,700</b>	<b>\$9,771,441</b>	<b>\$10,140,801</b>	<b>-\$746,747</b>	<b>-7%</b>	<b>-\$730,069</b>	<b>-7%</b>	<b>-\$715,345</b>	<b>-7%</b>
Income Eligible Single Family	\$4,509,586	\$4,617,438	\$4,289,135	\$3,824	0%	\$3,477	0%	\$3,479	0%
Income Eligible Multifamily	\$3,076,634	\$3,032,768	\$2,872,882	\$1,755	0%	\$1,661	0%	\$1,607	0%
Income Eligible Workforce Development	\$0	\$0	\$0	\$0		\$0		\$0	
<b>Income Eligible Total</b>	<b>\$7,586,220</b>	<b>\$7,650,206</b>	<b>\$7,162,017</b>	<b>\$5,578</b>	<b>0%</b>	<b>\$5,138</b>	<b>0%</b>	<b>\$5,086</b>	<b>0%</b>
Residential HVAC	\$1,516,153	\$1,402,302	\$1,235,692	\$1,043	0%	\$896	0%	\$849	0%
EnergyWise Single Family	\$11,084,778	\$11,508,026	\$11,992,924	\$6,835	0%	\$5,941	0%	\$5,991	0%
EnergyWise Multifamily	\$1,439,750	\$1,378,319	\$1,299,704	\$781	0%	\$728	0%	\$703	0%
Home Energy Reports	\$354,901	\$354,773	\$354,650	\$903	0%	\$903	0%	\$903	0%
Residential New Construction	\$579,867	\$616,956	\$474,926	\$545	0%	\$518	0%	\$482	0%
Comprehensive Marketing - Residential	\$79,670	\$82,058	\$84,518	\$0	0%	\$0	0%	\$0	0%
Residential Pilots	\$0	\$0	\$0	\$0		\$0		\$0	
Community Based Initiatives - Residential	\$46,467	\$47,862	\$49,297	\$0	0%	\$0	0%	\$0	0%
Residential Workforce Development	\$0	\$0	\$0	\$0		\$0		\$0	
<b>Residential Total</b>	<b>\$15,101,587</b>	<b>\$15,390,296</b>	<b>\$15,491,711</b>	<b>\$10,106</b>	<b>0%</b>	<b>\$8,986</b>	<b>0%</b>	<b>\$8,929</b>	<b>0%</b>
<b>Residential &amp; Income Eligible Total</b>	<b>\$22,687,807</b>	<b>\$23,040,502</b>	<b>\$22,653,729</b>	<b>\$15,685</b>	<b>0%</b>	<b>\$14,124</b>	<b>0%</b>	<b>\$14,014</b>	<b>0%</b>
EERMC	\$376,533	\$376,533	\$376,533	\$0	0%	\$0	0%	\$0	0%
OER	\$721,888	\$712,616	\$711,263	\$0	0%	\$0	0%	\$0	0%
<b>Regulatory Total</b>	<b>\$1,098,421</b>	<b>\$1,089,149</b>	<b>\$1,087,795</b>	<b>\$0</b>	<b>0%</b>	<b>\$0</b>	<b>0%</b>	<b>\$0</b>	<b>0%</b>
<b>Portfolio Total</b>	<b>\$33,323,928</b>	<b>\$33,901,092</b>	<b>\$33,882,325</b>	<b>-\$731,062</b>	<b>-2%</b>	<b>-\$715,944</b>	<b>-2%</b>	<b>-\$701,331</b>	<b>-2%</b>



# Gas Cost-to-Achieve

**\$/LIFETIME MMBtu**

Program	2024 Three-Year Plan (Third Draft)	2025 Three-Year Plan (Third Draft)	2026 Three-Year Plan (Third Draft)	2024 Three-Year Plan (Third Draft) Compared to 2024 Three-Year		2025 Three-Year Plan (Third Draft) Compared to 2025 Three-Year Plan		2026 Three-Year Plan (Third Draft) Compared to 2026 Three-Year Plan (Second)	
Large C&I New Construction	\$3.23	\$3.15	\$3.08	\$0.00	0%	\$0.00	0%	\$0.00	0%
Large C&I Retrofit	\$4.16	\$3.96	\$3.81	\$0.00	0%	\$0.00	0%	\$0.00	0%
Small Business Direct Install	\$6.38	\$6.44	\$6.64	\$0.01	0%	\$0.00	0%	\$0.00	0%
C&I Multifamily	\$13.41	\$13.62	\$13.88	-\$11.42	-46%	-\$12.05	-47%	-\$12.78	-48%
<b>C&amp;I Total</b>	<b>\$4.98</b>	<b>\$4.74</b>	<b>\$4.55</b>	<b>-\$0.39</b>	<b>-7%</b>	<b>-\$0.35</b>	<b>-7%</b>	<b>-\$0.32</b>	<b>-7%</b>
Income Eligible Single Family	\$37.17	\$38.06	\$35.35	\$0.03	0%	\$0.03	0%	\$0.03	0%
Income Eligible Multifamily	\$18.52	\$18.91	\$18.57	\$0.01	0%	\$0.01	0%	\$0.01	0%
<b>Income Eligible Total</b>	<b>\$26.39</b>	<b>\$27.16</b>	<b>\$25.95</b>	<b>\$0.02</b>	<b>0%</b>	<b>\$0.02</b>	<b>0%</b>	<b>\$0.02</b>	<b>0%</b>
Residential HVAC	\$6.85	\$6.80	\$6.95	\$0.00	0%	\$0.00	0%	\$0.00	0%
EnergyWise Single Family	\$18.06	\$18.01	\$17.88	\$0.01	0%	\$0.01	0%	\$0.01	0%
EnergyWise Multifamily	\$13.81	\$13.83	\$14.19	\$0.01	0%	\$0.01	0%	\$0.01	0%
Home Energy Reports	\$4.14	\$4.14	\$4.14	\$0.01	0%	\$0.01	0%	\$0.01	0%
Residential New Construction	\$7.91	\$8.31	\$8.67	-\$1.79	-18%	-\$1.85	-18%	-\$2.84	-25%
<b>Residential Total</b>	<b>\$13.75</b>	<b>\$13.93</b>	<b>\$14.34</b>	<b>-\$0.16</b>	<b>-1%</b>	<b>-\$0.16</b>	<b>-1%</b>	<b>-\$0.17</b>	<b>-1%</b>
<b>Residential &amp; Income Eligible Total</b>	<b>\$16.37</b>	<b>\$16.62</b>	<b>\$16.70</b>	<b>-\$0.15</b>	<b>-1%</b>	<b>-\$0.15</b>	<b>-1%</b>	<b>-\$0.16</b>	<b>-1%</b>
<b>Portfolio Total</b>	<b>\$10.09</b>	<b>\$9.83</b>	<b>\$9.45</b>	<b>-\$0.26</b>	<b>-3%</b>	<b>-\$0.25</b>	<b>-2%</b>	<b>-\$0.23</b>	<b>-2%</b>







# Responsiveness to Council Priorities

Priority	Assessment
<p><b>Priority #1:</b> Comply with LCP Standards</p>	<p><b>Responsive</b></p> <ul style="list-style-type: none"> <li>• Annual Plan provides detailed review, though there are some elements where we do not agree with the characterizations (e.g. Efficacy, whether ‘all cost-effective’ is being fully pursued).</li> <li>• Assessment of Cost-Effectiveness portion of LCP Standards Compliance still to be assessed in form of Cost-Effectiveness memo at future Council Meeting</li> </ul>
<p><b>Priority #2:</b> Give Due Consideration to Act on Climate</p>	<p><b>Partial</b></p> <ul style="list-style-type: none"> <li>• Stakeholders have repeatedly requested RIE provide an interim view of emissions contributions from EE that would align with Act on Climate in lieu of the 2025 Climate Strategy, since that document will not be available in time to inform this 3YP cycle.</li> <li>• RIE continues to point to presence of any emissions reductions as evidence of alignment which does not comport with fact of quantitative targets. In current drafts, this was supplemented with specifics from 2022 Climate Update which are appreciated.</li> <li>• Plan does include notable decreases of incentives for new gas equipment.</li> </ul>



# Responsiveness to Council Priorities

Priority	Assessment
<b>Priority #3:</b> Incorporate Stakeholder Input	<b>Responsive</b> <ul style="list-style-type: none"> <li>• RIE provided redlined text and written responses to all comments. However, several substantive comments ‘To Be Addressed’ and several key suggestions not incorporated.</li> <li>• The Company put in effort to fulfill requests for background data in the plan (e.g. C&amp;I participants by consumption class, SBDI participation reporting) even though some other information still pending</li> <li>• Adjustment of gas incentives a key area of responsiveness to input, as is the description of gaps between targets and goals</li> </ul>
<b>Priority #4:</b> Ensure an Effective & Efficiency Development & Review Process	<b>Partial</b> <ul style="list-style-type: none"> <li>• Considering the disconnects with the expectations around the first draft Three Year Plan, this year’s review process could have been better.</li> <li>• RIE was responsive to this feedback and significantly expanded second draft of Three-Year Plan</li> <li>• Later than expected delivery of some components (e.g. BCR and Rate and Bill Impact Models) has impacted review</li> </ul>



# Responsiveness to Council Priorities

Priority	Assessment
<p><b>Priority #5:</b> Set Ambitious Three-Year and Annual Plan Savings Goals</p>	<p><b>Partial</b></p> <ul style="list-style-type: none"> <li>• Ramp up of savings during 3YP, but still substantially below Targets.</li> <li>• New section that specifically seeks to identify and describe reasons the goals fall below the Targets is appreciated, but could offer more quantitative information on specific drivers.</li> <li>• Disconnect regarding continued opportunity for more savings paired with declining budget</li> </ul>
<p><b>Priority #6:</b> Increase Participation in Underserved Communities</p>	<p><b>Partial</b></p> <ul style="list-style-type: none"> <li>• Commitment made to develop equity metrics in Q1 2024, but important to ensure that Plan stakeholders and their feedback are actively involved in that process. No reason this process could not continue in Q4 of this year &amp; avoid EWG ‘stop and start’</li> <li>• Council and others should play more significant role in EWG oversight if that will be venue for finalizing metrics</li> <li>• No commitment to develop an equity component to the PIM despite openness to this in past conversations</li> </ul>
<p><b>Priority #7:</b> Conduct Targeted Workforce Development</p>	<p><b>Not Responsive</b></p> <ul style="list-style-type: none"> <li>• Specifics were added for code compliance training but little else in the way of additional details.</li> <li>• WFD seems to be more business as usual</li> <li>• Shifting burden more towards other state entities</li> <li>• WFD spending cut in half from the first draft 3YP/Annual Plan with no clear description of how they will support other entities doing WFD</li> <li>• Lack of workforce diversity identified as a challenge, but no specific solutions proposed in Plan</li> </ul>