

**BEFORE THE  
STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN: REVIEW OF RHODE ISLAND )  
ENERGY'S SYSTEM RELIABILITY )  
PROCUREMENT (SRP) INVESTMENT )  
PROPOSAL FOR ELECTRIC DEMAND )  
RESPONSE 2024-2026 – CONNECTED )  
SOLUTIONS )**

**DOCKET NO. 24-06-EE**

**DRAFT**  
PRE-FILED DIRECT TESTIMONY  
OF  
SAMUEL C. ROSS

SUBMITTED ON BEHALF OF  
THE RHODE ISLAND  
ENERGY EFFICIENCY AND RESOURCE MANAGEMENT COUNCIL

MARCH 22, 2024

1 **I. INTRODUCTION**

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3 **SAMUEL C. ROSS**

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5 **Q. Please state your name and business address.**

6 A. My name is Samuel Ross. My business address is: Optimal Energy, 225 Dyer St  
7 2<sup>nd</sup> Floor, Providence, RI 02903.

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9 **Q. On whose behalf are you testifying?**

10 A. I am testifying on behalf of the Rhode Island Energy Efficiency and Resource  
11 Management Council (EERMC).

12

13 **Q: Please summarize your work with the EERMC relevant to your role**  
14 **providing testimony in this docket.**

15 A: I am a Senior Director at Optimal Energy, the prime contractor for the EERMC's  
16 Consultant Team. I have been among the lead consultants on the Consultant Team  
17 for the past six years, and I have represented the EERMC in past dockets related  
18 to energy efficiency plans, which have historically included demand response  
19 program proposals. I have worked in close collaboration with the EERMC  
20 throughout the 2024-2026 Three-Year System Reliability Procurement Three  
21 Year Plan ("the Plan") development process, and reviewed draft and final  
22 versions of Rhode Island Energy's System Reliability Procurement (SRP)  
23 Investment Proposal for Electric Demand Response 2024-2026 – Connected  
24 Solutions ("the DR Proposal").

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26 **Q: What is the purpose of your Testimony in this proceeding?**

27 A: The purpose of my testimony is to describe aspects of the Council's engagement  
28 with the DR Proposal which the Council would like to ensure are reflected in the  
29 record of this Docket.

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**II. COUNCIL ENGAGEMENT WITH THE DR PROPOSAL**

**Q: Can you describe the aspects of the Council’s engagement with the DR Proposal which the Council would like to ensure are reflected in the record for this Docket?**

**A:** The Council would like to record three aspects of its engagement with the DR Proposal:

First, though the Council has not voted to officially take a position regarding the specific DR Proposal before the Commission in this Docket, the Council has motioned to intervene in this Docket in a manner consistent with LCP Standards Section 6.3.G. Though the Council did not endorse or oppose the DR Proposal before the Commission in this Docket, the Council wishes to ensure that it is in the record that the Council is strongly supports the continuation of robust Demand Response programs in Rhode Island, as these programs serve as an economically sound strategy for reducing ratepayer costs while also supporting other important policies and objectives regarding the electric distribution system. Such policies and objectives include but are not limited to support for effective management and utilization of existing distributed energy resources, engagement with customers regarding the societal benefits that arise from coordinated management of their energy consumption patterns and equipment, support for important emerging technology markets, and opportunities to explore additional value streams for Rhode Islanders associated with broader adoption of distributed energy resources throughout the state.

Second, the Council would like to ensure the Docket record reflects the robust public comment that the Council received during its January and February public meetings (See Exhibits 1-8). While the Council regularly receives public comment on various topics under its review or subject to discussion during its public meetings, the Council notes that the large number of in person and virtual comments received were beyond the typical levels, indicating significant interest from some members of the public in the specifics of the DR Proposal before the

1 Commission. The Council also notes that during the February EERMC meeting,  
2 Rhode Island Energy staff presented on the changes to the DR Proposal that they  
3 implemented, in part resulting from the robust public comment in January and  
4 subsequent technical review in consultation with the Council's Consultant Team.

5 Third, the Council would like the record to reflect that some elements of  
6 the process regarding SRP Investment Proposals contained in the Least Cost  
7 Procurement Standards were not fully followed in the development, review, and  
8 finalization of the DR Proposal before the Commission. Specifically, section  
9 6.3.G. of the Standards states in part:

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11 The distribution company shall submit any draft SRP Proposal to the  
12 Council and the Division of Public Utilities and Carriers for their review six  
13 weeks prior to filing the SRP Proposal with the PUC.  
14

15 The DR Proposal was filed with the Commission on February 8, 2024. While the  
16 Council did receive some materials related to this filing in the week leading up to  
17 its January 24<sup>th</sup> Public meeting, these materials were not adequate to satisfy this  
18 requirement because:

- 19  
20 1) They were incomplete (e.g. sections in the written document marked  
21 as 'forthcoming')
- 22 2) They were not provided six weeks prior to filing  
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24 The Council acknowledges that this was the first time the Connected Solutions  
25 program has been filed as an SRP Investment Proposal, and that new processes  
26 sometimes take additional time or present unexpected steps or requirements. The  
27 Council also acknowledges the hard work and commitment of the staff at Rhode  
28 Island Energy who contributed to the DR Proposal in its draft and final forms.  
29 Consequently, the Council is not raising this process issue as a matter of protest or  
30 contention in this Docket. Instead, the Council wishes to ensure the record reflects  
31 the process deviations that occurred as well as the Council's expectation that

1 future SRP Investment Proposals will fully adhere to this and other relevant  
2 aspects of the Least Cost Procurement Standards.

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4 **Q: Does this conclude your testimony?**

5 A: It does.