

MEMO

CONSULTANT TEAM

TO: Energy Efficiency Council
FROM: EEC Consultant Team (C-Team)
CC: Office of Energy Resources
DATE: May 15, 2025
RE: Summary of C-Team Comments on Rhode Island Energy's 2026 Plan Outline Memorandum



On Friday April 4, 2025, Rhode Island Energy (“the Company”) delivered the first of its major milestones in the development of the 2026 Annual Energy Efficiency Plan (“the Plan”) – The 2026 Plan Outline Memorandum (“Plan Outline Memo”). The Plan Outline Memo highlighted areas of the traditional Plan materials that the Company expects to approach differently in 2026. The Energy Efficiency Council’s¹ C-Team reviewed the Company’s Plan Outline Memo and largely focused our questions and comments on areas of clarification and/or areas that we felt would benefit from having more detail in the Plan itself. This memo summarizes the comments and questions that the C-Team provided to the Company on the Plan Outline Memo on April 25, 2025.

THE PLANNING PROCESS

- The Plan should document the process used to take into consideration recommendations made by the Division in the 2025 Plan Docket related to emissions accounting.
- The prioritization of electric and gas customer affordability aligns with the Council’s priorities. The Company should clearly document in the Plan any targeted decisions to forego otherwise achievable energy efficiency savings. Doing so will help ensure it is clear what tradeoffs the Company is making between reducing budgets in the spirit of putting downward pressure on ratepayer collections and the benefits that would otherwise accrue to Rhode Islanders, participants and non-participants alike.
- The Plan should clearly document the feedback process for the 2026 programs, including how feedback was solicited, what feedback was received, and how the feedback is being acted upon (or not) in the proposed implementation of 2026 programs.
- There should be greater detail around the incorporation of findings from Evaluation, Measurement, and Verification (EM&V) study findings. For example, tables that summarize the recommendations from each study and the actions that the Company is taking (or is not taking, and why) to address the recommendation.
- The Plan should document any new measures and/or approaches that were considered during the Plan development process, but ultimately not included, and why (e.g. cost-effectiveness, technical feasibility, etc.).

¹ All materials associated with the Energy Efficiency Council are the work of the “Energy Efficiency and Resource Management Council” and any public meetings materials posted on the RI Secretary of State website should be searched using that title.

- The Plan should speak to any impacts of federal tariff policies on planned implementation.
- The Plan should clearly communicate decision points that the Company used throughout the Plan development process. The C-Team would like to understand how the Company has considered factors such as equity and long-term benefits during the decision-making process.

EQUITY

- Measuring the efficacy of equity programming that the Company has began implementing is a critical component of the implementation process. The Plan should detail how the Company plans to measure effectiveness, assess what is working and what is not, and actions to take if efforts are ineffective.
- Established equity metrics, along with any new metrics established, should be continually reported over time and presenting in such a way that progress can easily be assessed. For example, a time series of the metrics data readily available in reporting documents will allow for greater understanding of the issues and progress over time.
- The Company should clarify how success in the Residential Equity Outreach Assessment is determined. Is it the number of attendees, audits generated, savings/ benefits produced, a combination of these, etc.?
- The Plan should clearly document the Company's efforts around expanding the community outreach model in 2026.

OUTSIDE FUNDING

- If the Company is not able to source outside funding to help remediate barriers to weatherization, it should consider whether there may be value in developing a Demonstration, Pilot, or Assessment (DPA) to test the potential effectiveness of a program that pays for barrier remediation if customers proceed with weatherization. If a DPA that facilitates this process can be shown to be successful, especially if it delivers cost-effective bill savings to customers, it may provide necessary evidence to be included in future program offerings.

COORDINATION WITH STATE AND FEDERAL INCENTIVE PROGRAMS

- The Plan should clearly document and demonstrate responsiveness to recommendations made by the Division related to coordination with OER on weatherization and electrification programs and offerings.
- The Company should consider efficiencies that could be gained by aligning its program offerings with OER's in a way such that customers don't have to apply for programs twice if the information that is necessary for one program can easily be shared with another that needs the same type of information.

ADVANCED METER FUNCTIONALITY (AMF)

- The Plan should clearly describe the research that it plans to conduct (or already has conducted) on AMF and energy efficiency program integration.

- AMF related research should not only consider how program offerings can enhance the impact of AMF, but also how AMF can impact or enhance program offerings.

DEMONSTRATIONS, PILOTS, AND ASSESSMENTS

- This section should include documentation of the Company's efforts to leverage research from EPRI and ESource as indicated would take place in the 2025 Implementation Plan.
- Does the refrigerant swap out demonstration refer to swapping out high Global Warming Potential (GWP) refrigerants with lower-GWP A2L refrigerants per EPA guidance?
- What measures does the Company have in place for refrigerant leak surveys and mitigation?
- If pursued, the Plan should clearly document the intended goals of the Air-to-water heat pumps demonstration.

COST OF SUPPLY JUSTIFICATION

- The Plan should continue to provide the multiple lens approach for the cost of energy efficiency versus cost of supply analysis which are helpful, especially when making program-specific justifications.

SUPPORTING THE GOALS OF THE ACT ON CLIMATE

- The Plan should document any considerations made based on results of the State's 2025 Climate Action Strategy (CAS). Even if it is not completed until after the 2026 Energy Efficiency Plan is final, it is possible (maybe even likely) that there will be actionable information coming out of the modeling component of the CAS that may be able to be incorporated into the Plan.

RESIDENTIAL PROGRAM FOCUS AREA

- The Company should share its assessment of the declining pool of weatherization opportunities, potentially in the Plan itself.
- Is the Company planning on identifying opportunities for supporting window heat pumps, which are slowly gaining traction in the market.
- The Plan should detail new approaches that the Company will take to achieve planned increases in measure adoption, particularly for heat pump water heaters.

COMMERCIAL & INDUSTRIAL FOCUS AREA

- What will be the Company's process for updating Energy Use Intensity (EUI) ranges for Path 1 of the Non-Residential New Construction Program?
- The Company should ensure significant lead time to inform impacts on overall program design. The C-Team recommends discussion at a future EE Technical Working Group meeting.
- The Company should clarify if any Combined Heat and Power (CHP) projects will utilize existing gas infrastructure on-site or if they will require new gas infrastructure to be built.
- For all proposed CHP projects, the Company should document the estimated electric savings, the expected gas usage, and an analysis of gas usage versus gas savings in the gas portfolio.