



Toby Ast
Rhode Island Energy
280 Melrose Street
Providence, RI, 02907

August 18th, 2025

RE: Green Energy Consumers Alliance Comments on Rhode Island Energy's Second Draft of the 2026 Energy Efficiency Annual Plan.

Dear Mr. Ast,

Thank you for the opportunity to comment on Rhode Island Energy's second draft of the 2026 Energy Efficiency Plan. Green Energy Consumers Alliance is a nonprofit organization based in Providence with the mission to empower consumers and communities to speed a just transition to a zero-carbon future. We respectfully submit the following comments.

In 2021, Rhode Island enacted the Act on Climate (AOC) creating mandatory and enforceable emissions reductions targets. According to a presentation to the Executive Climate Change Coordinating Council (EC4) of the 2022 RI Department of Environmental Management Greenhouse Gas Inventory, the state must reduce emissions by about 3.3% annually to meet the state mandates. That assumption includes calendar years 2023 and 2024, for which a GHG inventory has not yet been published, so the rate of reductions may now be greater than ~3.3% annually. Rhode Island Energy (RIE) has a central role to play in helping decarbonize energy delivered to customers and the annual energy efficiency plans lay the foundation for emissions reductions in homes and businesses.

The 2026 Energy Efficiency Plan Does Not Sufficiently Advance the Act on Climate Requirements.

Green Energy Consumers comments on the first draft of the 2026 Energy Efficiency Plan focused on increasing heat pump (HP) and heat pump water heater (HPWH) targets to align with state decarbonization goals and that broadly the Plan is not sufficient in supporting the mandates in the Act on Climate (AOC). Furthermore, the continued funding of incentives for fossil fuel equipment encourages investments that prolong the use of fossil fuel equipment and associated distribution system when the state must aggressively move away from fossil energy.

Additionally, it is unclear how RIE aims to reach the target of 750 annual electric resistance heat (ERH) to HP conversions set by the Public Utilities Commission in Docket No. 22-33-EE

(PUC)¹ when RIE is actively reducing annual conversion goals. Though the target was set to be reached by 2025, there has been no directive to minimize it and therefore should remain the target that RIE plans to reach. However, when evaluating the data included in RIE's Summary of Residential Measures for the 2026 Energy Efficiency Plan, the Company is planning to reduce their ERH to HP conversion targets by 305 units from 800 conversions in the 2025 Plan to 495 in the 2026 Plan. Cuts are seen in three HP program areas: HVAC, Energy-Wise Single-Family, and Income-Eligible Single-Family. The HVAC program will see the largest cuts, from 590 targeted conversions in the 2025 Plan to 375 in the 2026 Plan. The Income-Eligible Single-Family program is also projecting to reduce ERH to HP conversion targets from 190 to 110 which falls short of the target to have a 25% share of ERH to HP conversions serving income eligible clients when looking at RIE's overall conversion target of 495.² Cutting heat pump conversions goals will not only slow the transition to electrification but is not compliant with the PUC's Report & Order in Docket No. 22-33-EE.

The explanation for the reductions is attributed to "right-siz[ing] [] targets, namely in the form of reductions relative to aggressive 2025 targets."³ However the targets were set to abide by the reasonable directive set by the PUC and RIE falling short of reaching those targets does not warrant "right-sizing" but rather an evaluation of how performance can be increased to hit the targets. Green Energy Consumers agrees with the OER's request that RIE provide an update on the implementation of the RI-24-RE Electric Resistance Heat Characterization Study to better understand why RIE did not achieve the targets set by the PUC and how performance can be improved to hit targets instead of reduce them.

The Energy Efficiency Plan Should Align with Available Future of Gas Reports

While the final PUC Future of Gas report has not yet been released, it is imperative that at the very least, Rhode Island Energy utilize the findings in the Future of Gas Technical Report, prepared by the consultant Energy + Environmental Economics (E3) which was retained by the Company when creating the Company's annual energy efficiency plan. Amongst the findings that are compliant with the Act on Climate, E3 found that in order to reduce future gas system maintenance costs, there would need to be a targeted electrification of customers. Specifically, "if 50% of pipeline replacements are avoidable, up to 3,000 customers per year need to electrify their heating system in a targeted manner between 2027-2035."⁴ However, as long as RIE continues to provide incentives for

¹ [RIPUC Docket No. 22-33-EL Report & Order](#) p. 25

² RIE 2026 Summary of Residential Measures p. 2.

³ RIE Draft 2 of 2026 Energy Efficiency Annual Plan. Attachment 1, p. 21

⁴ [Rhode Island Investigation into the Future of the Regulated Gas Distribution Business Technical Analysis Report](#), p. 89

residential new construction to install high efficiency fossil fuel heating systems based on vague conditions like “market readiness” and “customer demand” the company is working in direct contradiction to finding in the E3 report.⁵

RIE also states in the same section of their 2026 Energy Efficiency Plan that “pending the outcome of the Future of Gas docket and updates to the statewide climate strategy, Rhode Island Energy will not make any significant changes to funding for natural gas equipment.” This lack of willingness to incorporate existing findings into the forthcoming efficiency plan seems to indicate that RIE is comfortable waiting as long as possible to conclude investments in the natural gas system.

Green Energy Consumers thanks Rhode Island Energy for the opportunity to provide comments on the Company’s second draft of the 2026 Energy Efficiency Plan.

Sincerely,

Tina Munter, RI Policy Advocate

Green Energy Consumers Alliance

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⁵ Rhode Island Energy Draft 2 of 2026 Energy Efficiency Annual Plan. Main Text Outline p. 4