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November 14, 2025

VIA ELECTRONIC MAIL AND HAND DELIVERY

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

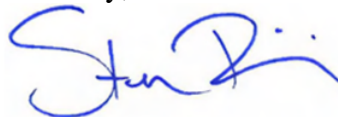
**Re: Docket No. 25-37-EE – The Narragansett Electric Company d/b/a Rhode Island Energy
2026 Energy Efficiency Annual Plan
Reply Testimony of Brett Feldman and Jeremy Newberger**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), I have enclosed the Company’s reply testimony of witnesses Brett Feldman and Jeremy Newberger in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Sincerely,



Steven J. Boyajian

Enclosures

cc: Docket No. 25-37-EE Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Heidi J. Seddon

November 14, 2025

Date

**Docket No. 25-37-EE – Rhode Island Energy’s 2026 Energy Efficiency Plan
Service list updated 10/2/2025**

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**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 25-37-EE
RE: 2026 ANNUAL ENERGY EFFICIENCY PLAN
WITNESS: FELDMAN
NOVEMBER 14, 2025**

REPLY TESTIMONY

OF

BRETT FELDMAN

November 14, 2025

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1 **I. Introduction**

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

3 A. My name is Brett Feldman. My business address is 280 Melrose Street, Providence,
4 Rhode Island 02907.

5
6 **Q. By whom are you employed and in what position?**

7 A. I am employed by the Narragansett Electric Company d/b/a Rhode Island Energy
8 (“Rhode Island Energy” or the “Company”), as Manager, Customer Energy Management,
9 Rhode Island. In this role, I lead the teams responsible for the Company’s energy
10 efficiency strategy, policy, and planning in Rhode Island.

11
12 **Q. Have you previously submitted pre-filed testimony in this proceeding?**

13 A. Yes. On October 1, 2025, I submitted pre-filed direct testimony in support of the
14 Company’s 2026 Annual Energy Efficiency and Conservation Procurement Program Plan
15 (“2026 Annual Plan”).

16
17 **Q. What is the purpose of your testimony?**

18 A. The purpose of this testimony is to respond to a specific statement made by Peter Gill
19 Case in his prefiled testimony filed in this docket on behalf of the Energy Efficiency and
20 Resource Management Council (“EERMC”).

1 **II. Reply to EERMC Testimony**

2 **Q. Did you have an opportunity to closely review the testimony of Mr. Case filed on**
3 **November 11, 2025 on behalf of the EERMC?**

4 A. Yes, I had an opportunity to closely review Mr. Case’s testimony.

5

6 **Q. To which statement by Mr. Case does the Company wish to respond?**

7 A. On page 13 of his testimony, Mr. Case states that he is “concerned that as a result of
8 significantly reducing its savings goals for 2026, [the Company] may be able to earn a
9 significantly higher shareholder incentive for its performance in 2026 than it earned in
10 2024 for a similar level of performance.”

11

12 **Q. Does the Company agree with this statement?**

13 A. No. This statement is factually inaccurate. The Performance Incentive earned by the
14 Company each year is not dependent upon the goals put forth in that year’s energy
15 efficiency plan. Instead, the Performance Incentive is based solely on actual benefits
16 achieved as reported in the Company’s Year End Report, not on planned benefits.

17 Therefore, if 2026 performance is at a “similar level” to 2024, the incentive would also
18 be similar irrespective of the differing savings goals in each year’s plan. To be clear, the
19 Company cannot earn a significantly higher shareholder incentive for its performance in
20 2026 than it earned in 2024 for a similar level of performance.

21

1 **III. Conclusion**

2 **Q. Does this conclude your testimony?**

3 **A. Yes, it does.**

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a RHODE ISLAND ENERGY
RIPUC DOCKET NO. 25-37-EE
RE: 2026 ANNUAL ENERGY EFFICIENCY PLAN
WITNESS: NEWBERGER
NOVEMBER 14, 2025**

REPLY TESTIMONY

OF

JEREMY NEWBERGER

November 14, 2025

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1 **I. Introduction**

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

3 A. My name is Jeremy Newberger. My business address is 75 Rockefeller Plaza, 10th Floor,
4 New York, NY 10019.

5
6 **Q. By whom are you employed and in what position?**

7 A. I am employed by Guidehouse, Inc., as an Associate Director in the Communities,
8 Energy, and Infrastructure practice area, focused on supporting Energy Providers in the
9 North Market area of the United States. For The Narragansett Electric Company d/b/a
10 Rhode Island Energy (“Rhode Island Energy” or the “Company”), I lead a team
11 supporting planning, evaluation, and reporting activities for energy efficiency.

12
13 **Q. Have you previously submitted pre-filed testimony in this proceeding?**

14 A. Yes. On October 1, 2025, I submitted pre-filed direct testimony in support of the
15 Company’s 2026 Annual Energy Efficiency and Conservation Procurement Program Plan
16 (“2026 Annual Plan”).

17
18 **Q. What is the purpose of your reply testimony?**

19 A. The purpose of this testimony is to respond to Jennifer Kallay’s pre-filed direct testimony
20 filed on behalf of the Division of Public Utilities and Carriers (“Division”) on November
21 11, 2025 (“Ms. Kallay’s Testimony”).

1 **II. Reply to Division Testimony**

2 **Q. Did you have an opportunity to closely review Ms. Kallay’s Testimony filed on**
3 **behalf of the Division?**

4 A. Yes, I had an opportunity to closely review Ms. Kallay’s Testimony.

5

6 **Q. Overall, is the Division in support of the Company’s 2026 Annual Plan?**

7 A. Yes, subject to the specific recommendations outlined in Ms. Kallay’s Testimony, the
8 Division is generally supportive of the Company’s proposed 2026 Annual Plan.

9

10 **Q. To which Division recommendation does the Company wish to respond?**

11 A. The Company is responding to the Division’s recommendation that the Company delay
12 adoption of the “weatherization, delayed conversion” savings calculation assumptions
13 because the Company disagrees that these savings calculation assumptions should be
14 delayed.

15

16 **Q. Please explain the reason for the revisions to savings calculations for single family**
17 **weatherization measures that led to the introduction of the “weatherization, delayed**
18 **conversion” savings calculations.**

19 A. The revisions to savings calculations for single family weatherization measures were
20 motivated by comments made by the Division about weatherization savings calculations
21 in its 2025 Annual Energy Efficiency and Conservation Procurement Program Plan

1 (“2025 Annual Plan”). This led to the creation of the “weatherization, delayed
2 conversion” measures. Assumptions developed to calculate savings for “weatherization,
3 delayed conversion” for energy efficiency planning for 2026 were developed specifically
4 to address comments the made by the Division in Docket No. 24-39-EE concerning the
5 Company’s 2025 Annual Plan and to improve upon the weatherization calculations
6 included in the 2025 Annual Plan. This effort was focused on energy efficiency planning
7 needs for weatherization savings and did not involve other departments at Rhode Island
8 Energy.

9
10 **Q. Please describe the components of the “weatherization, delayed conversion”**
11 **calculation.**

12 A. There are three components to the “weatherization, delayed conversion” calculation: (1)
13 the savings for weatherization, before and after conversion; (2) the number of
14 weatherization participants expected to convert their heating equipment over the 20-year
15 measure life of the weatherization measure; and (3) at what point in time, over the 20
16 year measure life of the weatherization measure, conversion is expected to occur.

17

1 **Q. The Division asserts that Rhode Island Energy does not have data to support the**
2 **improved accounting for the “weatherization, delayed conversion” measure savings**
3 **calculation (Ms. Kallay’s Testimony page 24, line 5). Do you agree with that**
4 **statement? Please explain.**

5 A. No, I do not agree with the Division’s assertion. Breaking down the savings calculation
6 into the three components I identified earlier in my testimony:

7
8 (1) Rhode Island Energy has well sourced and documented savings information for
9 weatherization, before and after conversion from evaluation studies, as described in the
10 Company’s response to data request PUC 2-25.

11
12 (2) Rhode Island Energy has sourced the best available information on the number of
13 annual heat pump installations in the state by original heating fuel type from Office of
14 Energy Resources’ (“OER”) data and the Company’s own programmatic data. As noted
15 in the Company’s response to data request Division 2-12, the “heat pump conversion data
16 provided directionality in the assumptions for heat pump conversions relative to the
17 amount of weatherizations performed by Rhode Island Energy.” Furthermore, as
18 explained in the Company’s response to data request PUC 2-18, the Company made
19 adjustments given OER’s current prioritization of delivered fuel customer conversions
20 and the Company’s prioritization of converting customers with electric resistance heat.

21

1 (3) Neither the Company nor the OER currently collects information on what point in
2 time, over the 20 year measure life of the weatherization measure, conversion is expected
3 to occur. As noted in the Company's response to data request PUC 2-40, it could take
4 years to collect sufficient data. Ten years was chosen because it is the midpoint and helps
5 avoid skewing the calculation too much in one direction or the other while better data on
6 this question is collected.

7
8 **Q. Do you acknowledge that some of the data the Company is relying on could be**
9 **stronger?**

10 A. Yes, I acknowledge that some of the data could be stronger. There may be better data,
11 perhaps over time, regarding the number of weatherization participants expected to
12 convert their heating equipment over the 20-year measure life of the weatherization
13 measure or the timing of conversion of weatherized customers over the 20-year measure
14 life of the weatherization measure.

15
16 **Q. Do you think that Rhode Island Energy should delay adoption of the savings**
17 **calculation assumptions for the delayed conversion measures until it has better**
18 **data? If no, why not?**

19 A. No. As noted in the Company's response to data request PUC 2-20, in developing the
20 2026 Annual Plan, Rhode reviewed the Division's testimony from the 2025 Annual Plan
21 proceedings and concluded an adjustment to the savings calculations for weatherization

1 was appropriate. The Company therefore used the best available data, as described above,
2 to improve its savings calculation as the Division recommended in 2025. The Company
3 believes it is preferable to use assumptions that improve over the 2025 calculation, as
4 opposed to reverting back to the 2025 assumptions, which are no longer supportable.

5
6 **Q. Should collection of improved data over what is currently available be a precursor**
7 **to adoption of the updated savings calculation for 2026? If no, why not.**

8 A. No. Collection of more data could be independent of adoption of the savings calculation.
9 Using the best data available now in the calculation of weatherization savings for 2026
10 leads to an incremental improvement over the calculation of savings for the 2025 Annual
11 Plan; additional data would improve it further for future years.

12
13 **Q. Do you see a downside in the Division's recommendation? If so, what is the**
14 **downside?**

15 A. Yes, there is a downside. If the Company were to retain the 2025 planning assumptions, it
16 would result in a known overstatement of benefits for both the gas and electric programs,
17 and an understatement of the electric utility system benefits from energy efficiency, as
18 noted by the Division (Ms. Kallay's Testimony, page 23).

19

1 **Q. Is there a downside to adopting the Company’s assumptions for these variables for**
2 **2026 and then updating the assumptions as more data becomes available in 2027**
3 **and beyond?**

4 A. Years of experience with energy efficiency program planning have shown that it is never
5 possible to predict with 100 percent certainty what will happen during an upcoming
6 program year. Best practice is to make the best use of the information at hand to estimate
7 program impacts. The uncertainty or downside associated with adopting the proposed
8 planning assumptions is less than the known deficiencies of using the old planning
9 assumptions.

10
11 **Q. Will the Company work with stakeholders in the future to refine and improve this**
12 **methodology as is also recommended by the Division?**

13 A. Yes. The Company would welcome an opportunity to engage with stakeholders
14 throughout the planning process.

15
16 **Q. Will the Company’s energy efficiency team coordinate with other relevant**
17 **departments within the Company to make sure that assumptions and electric and**
18 **gas load impacts are properly aligned and accounted for as appropriate?**

19 A. Yes.

20

1 **III. Conclusion**

2 **Q. Does that conclude your testimony?**

3 **A. Yes.**