



November 6, 2025

Chairperson Ronald Gerwatowski
Commissioner Abigail Anthony
Commissioner Karen Bradbury

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket 25-37-EE – 2026 Annual Energy Efficiency Program Plan Comments

Dear Commissioners:

The Rhode Island Office of Energy Resources (OER) submits the following comments regarding Rhode Island Energy's proposed 2026 Energy Efficiency Program Plan ("the Plan").

OER supports and encourages approval of the Plan as submitted by Rhode Island Energy ("the Company"). The Plan is expected to deliver \$2.22 in Rhode Island Test benefits per dollar invested, create over \$212 million in total lifetime benefits, and support the equivalent of over 1,600 full-time employees in the Rhode Island clean energy economy. Beyond directly reducing energy costs for participants, the Plan's investments in energy efficiency will reduce costs for all ratepayers by delivering systemwide annual electricity savings equivalent to 0.97% of 2026 projected consumption and annual gas energy savings equivalent to 0.48% of 2026 projected consumption. Furthermore, the Plan is expected to deliver aggregate greenhouse gas (GHG) emissions savings equivalent to 0.19% of Rhode Island's statewide 2022 inventory, advancing progress towards the statewide GHG reduction targets.

OER appreciates the Company's attention on near-term affordability needs. OER had requested that the Company identify opportunities to reduce the overall program costs where appropriate, as demonstrated by the planned 18% budget reduction to \$95,648,200 that will enable a 35% reduction in the electric system benefit charge and a 13% reduction in the consumption-weighted average gas system benefit charge. OER commends the company for realizing these cost savings for ratepayers through thoughtful rather than blanket budget cuts, especially by trimming non-rebate expenses including sales, technical assistance, and training (STAT) and marketing over 60% more aggressively than the portfolio average. Critically, income eligible programs remain a strong priority for the Company and still account for over 32% of combined residential spending, supporting households with the largest energy burdens.

OER notes that this Plan does not preclude the Company from exceeding approved spending in the case that customer demand for efficiency upgrades outpaces expectations. As noted in section 8.2.6 of the Company's Plan, the Company may exceed their portfolio spending by 10% with written notice provided to the EERMC, OER, PUC and Division. If expenses are projected to be greater than 10% of their



planned budget, the Company can seek a vote of approval from the EERMC on the increased spending and petition the PUC for spending over 10% if warranted.

In addition to the programming offered by Rhode Island Energy, OER is also implementing programs to upgrade residential appliances to more efficient options. In July, OER relaunched the Clean Heat Rhode Island (CHRI) program for heat pump installations to low- and moderate-income households that heat with natural gas or delivered fuels. Customers that currently heat with electric resistance heating are eligible for enhanced heat pump rebates from the Company, keeping the target audiences for our programs separate. OER is also administering the Home Electrification and Appliance Rebates (HEAR) program, which is currently providing Energy Star electric stoves and Energy Star heat pump clothes dryers to income-eligible households, along with wiring and electric panel upgrades to facilitate residential efficiency and electrification efforts. The OER programs are complimentary to the proposed Plan from the Company for efficiency upgrades while avoiding direct cost recovery from ratepayers.

Within the Company's planned residential program, OER supports the new midstream heat-pump water heater offering and requests that the Company report rebates deployed through this pathway separately from those delivered through the existing downstream vendor. Separately, OER supports the HEAT loan as a tool for customers to access lower-cost financing for projects. However, OER finds the Company's existing information on the program to be insufficient and inaccessible given the changes in availability the Company indicated in its filings in 24-39-EE, nor is the HEAT loan program mentioned or referenced in the quarterly reports the Company has filed to date for the 2025 program year. To add more transparency to this program, OER respectfully requests that the Company create a new webpage with information on the HEAT loan program, including customer eligibility, participating lenders, and interest rates to improve customer knowledge of and trust in this offering. Additionally, OER requests that the Company provide more detailed information on this program in future reports and plans.

OER respectfully recommends the Commission approve the Plan, finding that it balances multiple state interests, including ratepayer costs, emissions reductions, and maintaining a strong energy efficiency workforce for the state's clean energy economy.

Sincerely,

A handwritten signature in cursive script that reads "Chris Kearns". The signature is written in black ink on a white background and is enclosed in a thin black rectangular box.

Chris Kearns
Acting Commissioner
Office of Energy Resources