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October 21, 2025

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

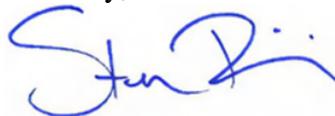
**Re: Docket No. 25-37-EE – The Narragansett Electric Company d/b/a Rhode Island Energy  
2026 Energy Efficiency Annual Plan  
Responses to Division Data Requests – Set 1 (Full Set)**

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 responses to the Division of Public Utilities and Carriers’ First Set of Data Requests (Full Set) for filing with the Public Utilities Commission 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

Enclosure

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

October 21, 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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Division 1-1  
Budget, Savings, and Benefits

Request:

Please provide the following information for both gas and electric as of end of September 2025 (unless question indicates otherwise):

- a. Number of active residential accounts
- b. Number of delinquent accounts with oldest arrears aged 30 to 60 days after issuance of bill
- c. Number of delinquent accounts with oldest arrears aged 60 to 90 days after issuance of bill
- d. Number of delinquent accounts with oldest arrears aged 90+ days after issuance of bill
- e. The total dollar value of accounts with oldest arrears aged 90+ days after issuance of bill
- f. The total dollar value of all delinquent accounts
- g. The total dollar value of all delinquent accounts as of September 2024
- h. The growth in the total dollar value of delinquent accounts between September 2024 and September 2025
- i. The number of accounts sent notice of disconnection for non-payment
- j. Number of low-income accounts
- k. Number of low-income delinquent accounts

Response:

- a. Number of active residential accounts  
Electric: 452,676  
Gas: 252,640

Division 1-1, Page 2  
Budget, Savings, and Benefits

- b. Number of delinquent accounts with oldest arrears aged 30 to 60 days after issuance of bill  
Electric: 32,793  
Gas: 14,910
- c. Number of delinquent accounts with oldest arrears aged 60 to 90 days after issuance of bill  
Electric: 15,465  
Gas: 6,265
- d. Number of delinquent accounts with oldest arrears aged 90+ days after issuance of bill  
Electric: 67,676  
Gas: 48,005
- e. The total dollar value of accounts with oldest arrears aged 90+ days after issuance of bill  
Electric: \$130,336,029  
Gas: \$62,079,573
- f. The total dollar value of all delinquent accounts  
Electric: \$147,894,356  
Gas: \$65,627,250
- g. The total dollar value of all delinquent accounts as of September 2024  
Electric: \$133,324,438  
Gas: \$47,136,594
- h. The growth in the total dollar value of delinquent accounts between September 2024 and September 2025  
Electric: \$14,569,918  
Gas: \$18,490,656
- i. The number of accounts sent notice of disconnection for non-payment  
Electric: 39,192  
Gas: 14,589
- j. Number of low-income accounts  
Electric: 35,210  
Gas: 21,596

Division 1-1, Page 3  
Budget, Savings, and Benefits

- k. Number of low-income delinquent accounts
  - Electric: 18,044
  - Gas: 10,687

Division 1-2  
Budget, Savings, and Benefits

Request:

Bates Page 9 states: "Specifically, in 2026 the Company reduced incentives and quantities for several delivered fuels measures."

- a. Please identify the delivered fuels measures and show the reduced incentives and quantities for each measure. Please identify the programs that provide measures.
- b. Please identify the reduction in budget, annual and lifetime savings, and benefits associated with this change by program and in total.

Response:

- a. Please see Attachment Division 1-2 for a table displaying the program, measure name, and reduced incentives and quantities for each applicable delivered fuel measure.
- b. Please see Attachment Division 1-2 for a table displaying the reduction in budget, annual and lifetime savings, and benefits associated with the reduced incentives and quantities for several delivered fuels measures by program and in total.

Please note that values in Attachment Division 1-2 have been updated to reflect the correction identified in the Company's response to data request Division 1-35.

(a) (b) (c) (d) (e) (f) (g)  
a) Table 1. Delivered Fuels Measures with Reduced Quantities and Incentives

Program	Measure	Quantity Units	2026 Plan		2025 Plan	
			Quantity	Incentive	Quantity	Incentive
Residential HVAC	WiFi programmable thermostat with cooling (oil)	per unit of measure	725	\$54,375	1650	\$123,750
Residential HVAC	Window Replacement -Oil	per unit of measure	20	\$1,500	25	\$1,875
Residential HVAC	Window Replacement -Propane	per unit of measure	20	\$1,500	25	\$1,875
EnergyWise Single Family	Pipe Insulation, Others	per unit of measure	310	\$2,170	660	\$4,620
EnergyWise Single Family	Programmable Thermostat, Oil	per unit of measure	1810	\$181,000	2780	\$278,000
EnergyWise Single Family	Weatherization, Oil	per unit of measure	300	\$795,000	1498	\$3,969,700
EnergyWise Single Family	Weatherization, Others	per unit of measure	40	\$92,000	200	\$460,000
EnergyWise Single Family	WiFi Thermostat - Oil	per unit of measure	0	\$0	66	\$13,200
EnergyWise Single Family	WiFi Thermostat - Others	per unit of measure	0	\$0	22	\$4,400
EnergyWise Multifamily	Aerator - Oil	per unit of measure	4.5	\$23	5	\$25
EnergyWise Multifamily	Air Sealing - Oil	per mmbtu oil	27.9	\$2,790	31	\$3,100
EnergyWise Multifamily	Insulation - Oil	per mmbtu oil	25.2	\$2,974	28	\$3,304
EnergyWise Multifamily	Pipe Wrap DHW - Oil	per unit of measure	2.7	\$8	3	\$9
EnergyWise Multifamily	Programmable Thermostat - Oil	per unit of measure	1.8	\$225	2	\$250
EnergyWise Multifamily	Showerhead - Oil	per unit of measure	0.9	\$23	1	\$25
EnergyWise Multifamily	TSV Showerhead - Oil	per unit of measure	0.9	\$36	1	\$40
Residential Consumer Products	Low Flow Showerhead w/ TSV - Oil	per unit of measure	25	\$375	30	\$450
Residential Consumer Products	Low Flow Showerhead w/ TSV - Other	per unit of measure	25	\$375	30	\$450
Income Eligible Single Family	Domestic Hot Water Measure, Oil	per unit of measure	0	\$0	16	\$320
Income Eligible Single Family	Weatherization, Oil	per unit of measure	57	\$313,500	237	\$1,303,500
Income Eligible Single Family	Weatherization, Other	per unit of measure	2	\$11,000	21	\$115,500
Income Eligible Single Family	Wi-Fi Thermostat - Oil	per unit of measure	2	\$550	31	\$8,525
Income Eligible Single Family	Wi-Fi Thermostat - Other	per unit of measure	2	\$550	6	\$1,650
Income Eligible Multifamily	Aerator - Oil	per unit of measure	1.8	\$9	2	\$10
Income Eligible Multifamily	Air Sealing - Oil	per MMBtu oil	27.9	\$2,790	31	\$3,100
Income Eligible Multifamily	Insulation - Oil	per MMBtu oil	25.2	\$4,536	28	\$5,040
Income Eligible Multifamily	Showerhead - Oil	per unit of measure	1.8	\$45	2	\$50

b) Table 2. Reductions in Budget, Annual and Lifetime Savings, and Benefits by Program and Total

Program	Reduction in Incentive Budget	Reduction in Total Net Annual MMBtu Savings	Reduction in Total Net Lifetime MMBtu Savings	Reduction in Benefits
Residential HVAC	\$70,125	2616.22	28808.58	\$1,241,649
EnergyWise Single Family	\$3,659,750	16873.68	334194.72	\$15,870,181
EnergyWise Multifamily	\$675	0.91	15.45	\$2,483
Residential Consumer Products	\$150	13.49	202.39	\$8,089
Income Eligible Single Family	\$1,103,895	3016.40	59340.43	\$2,880,874
Income Eligible Multifamily	\$820	6.51	140.89	\$6,767
<b>Total</b>	<b>\$4,835,415</b>	<b>22527.21</b>	<b>422702.47</b>	<b>\$20,010,043</b>

Division 1-3  
Budget, Savings, and Benefits

Request:

Bates Page 9 states: "The Company also reduced budgets in anticipation of the continuing implementation of the new Rhode Island energy code, as the code changes raise baselines and, therefore, reduce the opportunity for savings." Please identify the reduction in budget, annual and lifetime savings, and benefits associated with this change by program and in total.

Response:

The Company recognizes that the continued implementation of the new Rhode Island energy code will likely reduce the savings potential for energy efficiency projects and installed measures but did not identify a code-related specific adjustment factor that would be applicable to the reduction to the budgets and savings when developing the 2026 Annual Energy Efficiency Plan.

DIV 1-4  
Budget, Savings, and Benefits

Request:

Bates Pages 24 and 25 state: "Several changes in the Annual Plan result in the budgets impacts identified in the question above. The most significant changes include:

- (1) Reducing non-incentive expenses like Program Administration, Marketing, Sales and Technical Assistance, and Evaluation
  - (2) Transitioning Home Energy reports to email-only delivery
  - (3) Rebalancing measure mix in EnergyWise Single Family to streamline programs and reduce budgets
  - (4) Shifting lighting budget toward more advanced controls in anticipation of phasing out incentives for non-controlled LED lighting.
  - (5) Adjusting budgets for Large Commercial & Industrial Retrofit, New Construction, and Small Business Direct Install downward to reflect market conditions."
- a. For each of these components, please provide the change to the 2026 proposed electric budget, annual and lifetime savings, and benefits by program and in total.
  - b. For each of these components, please provide the change to the 2026 proposed gas budget, annual and lifetime savings, and benefits by program and in total.
  - c. Regarding 'reducing non-incentive expenses like Program Administration', please confirm that PP&A budgets decline for the electric and gas plans in 2026 as compared to 2025. If PP&A budgets increase, please explain why.
  - d. Regarding 'rebalancing the measure mix in EnergyWise Single Family', please identify which measures are affected and the change in quantity for each measure. Please clearly identify which measures are associated with the electric portion of the plan versus the gas portion of the plan.
  - e. Regarding 'shifting lighting budget toward more advanced controls in anticipation of phasing out incentives for non-controlled LED lighting', please provide the change in quantities. Please confirm which programs provide these measures.

DIV 1-4, Page 2  
Budget, Savings, and Benefits

- f. Regarding ‘adjusting budgets for Large Commercial & Industrial Retrofit, New Construction, and Small Business Direct Install downward to reflect market conditions’, please identify which measures are affected and the change in quantity for each measure. Please clearly identify which measures are associated with the electric portion of the plan versus the gas portion of the plan.

Response:

- a. Please see Attachment Division 1-4-1. Please note that values in Attachment Division 1-4-1 have been updated to reflect the correction identified in the Company’s response to Division 1-35.
- b. For responses to parts (1), (2), (3), and (5), please see Attachment Division 1-4-2. The change identified in part (4) does not impact the gas portfolio.
- c. The Company confirms that PP&A budgets decline for the electric and gas plans in 2026 as compared to 2025.
- d. Please see Table 1 for changes in EnergyWise Single Family measure quantities.

**Table 1**

	(a)	(b)	(c)	(d)	(e)
	<b>Measure</b>	<b>Electric/Gas</b>	<b>2025 Filed</b>	<b>2026 Proposed</b>	<b>Change</b>
(1)	Aerator, Electric	Electric	246	820	574
(2)	Aerator, Oil	Electric	231	1,100	869
(3)	Aerator, Others	Electric	33	110	77
(4)	Electric Resistance to MSHP	Electric	20	-	*1
(5)	Electric Resistance to MSHP (per ton)	Electric		21	*2
(6)	Participant	Electric	5,070	5,150	80
	(a)	(b)	(c)	(d)	(e)

<sup>1</sup> This measure has been shifted to a per ton measure, as indicated in the row below. Therefore, it cannot be perfectly compared year over year.

<sup>2</sup> This measure used to be per quantity and now counts per ton of savings. Therefore it cannot be compared with its equivalent in the row above.

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Budget, Savings, and Benefits

(7)	Pipe Insulation, Electric	Electric	1,584	3,170	1,856
(8)	Pipe Insulation, Oil	Electric	2,420	4,000	580
(9)	Pipe Insulation, Others	Electric	660	310	-650
(10)	Pre-weatherization	Electric	715	800	85
(11)	Programmable Thermostat - Elec	Electric	846	630	-216
(12)	Programmable Thermostat, Oil	Electric	2,780	1,810	-970
(13)	Programmable Thermostat, Others	Electric	74	110	36
(14)	Refrigerator Brush	Electric	4,221	7,400	3,179
(15)	Showerhead – Elec	Electric	1,140	1,100	-40
(16)	Showerhead – Other	Electric	66	140	74
(17)	Smart Strip	Electric	7,598	11,500	3,902
(18)	Weatherization, Electric Resistance	Electric	330	220	-110
(19)	Weatherization, Oil	Electric	1,498	300	-1198
(20)	Weatherization, Others	Electric	200	40	-160
(21)	Weatherization, Delayed HP conversion of electric resistance	Electric		220	220
(22)	Weatherization, Delayed HP conversion of oil	Electric		900	900
(23)	Weatherization, Delayed HP conversion of propane	Electric		120	120
(24)	WiFi Thermostat - AC Only	Electric	15	-	-15
(25)	WiFi Thermostat – Oil	Electric	66	-	-66
(26)	WiFi Thermostat – Others	Electric	22	-	-22
(27)	Aerator	Gas	761	3,200	2,439
(28)	Pipe Wrap	Gas	5407	12,000	6,593
(29)	Programmable thermostat	Gas	1942	2,300	358
(30)	Showerhead	Gas	1050	2,600	1,550
(31)	Weatherization	Gas	2362	2,250	-112
(32)	Weatherization, Delayed HP conversion of gas	Gas		750	750
(33)	WiFi thermostat	Gas	79	-	-79

DIV 1-4, Page 4  
Budget, Savings, and Benefits

- e. The electric Retrofit and Small Business Direct Install Programs are impacted by shifting lighting budgets toward more advanced controls in anticipation of phasing out incentives for non-controlled LED lighting. The changes to these budgets and net lifetime kWh savings for lighting measures are included in Attachment Division 1-4-1, Table 4.
- f. Please see Attachment Division 1-4-3 for a table of electric measures and quantities which were adjusted downward to reflect market conditions. Please see Attachment Division 1-4-4 for a table of gas measures and quantities which were adjusted downward to reflect market conditions.

**(1) Reducing non-incentive expenses like Program Administration, Marketing, Sales and Technical Assistance, and Evaluation**

	(a)	(b)	(c)	(d)	(e)
Program		Change to Budget (\$)	Change to Annual Savings (MWh)	Change to Lifetime Savings (MWh)	Change to Benefits (\$)
(1) Residential New Construction		\$ (36,042)	N/A	N/A	N/A
(2) Residential HVAC		\$ (56,050)	N/A	N/A	N/A
(3) EnergyWise Single Family		\$ (291,241)	N/A	N/A	N/A
(4) EnergyWise Multifamily		\$ (103,840)	N/A	N/A	N/A
(5) Home Energy Reports		\$ (1,674,491)	N/A	N/A	N/A
(6) Residential Consumer Products		\$ (383,087)	N/A	N/A	N/A
(7) Income Eligible Single Family		\$ (844,994)	N/A	N/A	N/A
(8) Income Eligible Multifamily		\$ (129,664)	N/A	N/A	N/A
(9) Large C&I New Construction		\$ (637,527)	N/A	N/A	N/A
(10) Large C&I Retrofit		\$ (1,761,173)	N/A	N/A	N/A
(11) Small Business Direct Install		\$ (147,781)	N/A	N/A	N/A
(12) Total		\$ (6,065,891)	N/A	N/A	N/A

**(2) Transitioning Home Energy reports to email-only delivery**

	(a)	(b)	(c)	(d)	(e)
Program		Change to Budget (\$)	Change to Annual Savings (MWh)	Change to Lifetime Savings (MWh)	Change to Benefits (\$)
(1) Home Energy Reports		\$ (1,674,491)	-4,015	-4,015	\$ (533,887)

**(3) Rebalancing measure mix in EnergyWise Single Family to streamline programs and reduce budgets**

	(a)	(b)	(c)	(d)	(e)
Program		Change to Budget (\$)	Change to Annual Savings (MWh)	Change to Lifetime Savings (MWh)	Change to Benefits (\$)
(1) EnergyWise Single Family		\$ (291,241)	621	7,806	\$ (8,317,232)

**(4) Shifting lighting budget toward more advanced controls in anticipation of phasing out incentives for non-controlled LED lighting.**

	(a)	(b)	(c)	(d)	(e)
Program		Change to Budget (\$)	Change to Annual Savings (MWh)	Change to Lifetime Savings (MWh)	Change to Benefits (\$)
(1) Large C&I Retrofit		\$ (556,417)	2,110	-1,616	\$ (4,896,807)
(2) Small Business Direct Install		\$ (1,448,634)	-1,425	-3,963	\$ (1,333,738)
(3) Grand Total		\$ (2,005,051)	685	-5,579	\$ (6,230,545)

**(5) Adjusting budgets for Large Commercial & Industrial Retrofit, New Construction, and Small Business Direct Install downward to reflect market conditions.**

	(a)	(b)	(c)	(d)	(e)
Program		Change to Budget (\$)	Change to Annual Savings (MWh)	Change to Lifetime Savings (MWh)	Change to Benefits (\$)
(1) Large C&I New Construction		\$ (2,925,900)	-4,143	-64,255	\$ (21,141,900)
(2) Large C&I Retrofit		\$ (4,878,300)	687	-10,309	\$ (6,923,700)
(3) Small Business Direct Install		\$ (3,297,500)	-2,050	-8,163	\$ (4,311,800)
(4) Grand Total		\$ (11,101,700)	-5,506	-82,727	\$ (32,377,400)

**(1) Reducing non-incentive expenses like Program Administration, Marketing, Sales and Technical Assistance, and Evaluation**

	(a)	(b)	(c)	(d)	(e)
Program	Change to Budget (\$)	Change to Annual Savings (MMBTU)	Change to Lifetime Savings (MMBTU)	Change to Benefits (\$)	
(1) Residential New Construction	\$ (7,058)	N/A	N/A	N/A	N/A
(2) Residential HVAC	\$ (110,187)	N/A	N/A	N/A	N/A
(3) EnergyWise Single Family	\$ (326,021)	N/A	N/A	N/A	N/A
(4) EnergyWise Multifamily	\$ (42,621)	N/A	N/A	N/A	N/A
(5) Home Energy Reports	\$ (152,679)	N/A	N/A	N/A	N/A
(6) Income Eligible Single Family	\$ 62,903	N/A	N/A	N/A	N/A
(7) Income Eligible Multifamily	\$ (50,403)	N/A	N/A	N/A	N/A
(8) Large C&I New Construction	\$ (123,648)	N/A	N/A	N/A	N/A
(9) Large C&I Retrofit	\$ (733,470)	N/A	N/A	N/A	N/A
(10) Small Business Direct Install	\$ (10,571)	N/A	N/A	N/A	N/A
(11) C&I Multifamily	\$ (54,379)	N/A	N/A	N/A	N/A
(12) Total	\$ (1,548,132)	N/A	N/A	N/A	N/A

**(2) Transitioning Home Energy reports to email-only delivery**

	(a)	(b)	(c)	(d)	(e)
Program	Change to Budget (\$)	Change to Annual Savings (MMBTU)	Change to Lifetime Savings (MMBTU)	Change to Benefits (\$)	
(1) Home Energy Reports	\$ (152,679)		-27,778	-27,778	\$ (637,403)

**(3) Rebalancing measure mix in EnergyWise Single Family to streamline programs and reduce budgets**

	(a)	(b)	(c)	(d)	(e)
Program	Change to Budget (\$)	Change to Annual Savings (MMBTU)	Change to Lifetime Savings (MMBTU)	Change to Benefits (\$)	
(1) EnergyWise Single Family	\$ (326,021)	6,458	100,180	\$2,869,406	

**(5) Adjusting budgets for Large Commercial & Industrial Retrofit, New Construction, and Small Business Direct Install downward to reflect market conditions.**

	(a)	(b)	(c)	(d)	(e)
Program	Change to Budget (\$)	Change to Annual Savings (MMBTU)	Change to Lifetime Savings (MMBTU)	Change to Benefits (\$)	
(1) Large C&I New Construction	\$ (682,900)	-25,632	-417,192	\$ (10,216,000)	
(2) Large C&I Retrofit	\$ (1,810,000)	-48,115	-462,506	\$ (10,719,100)	
(3) Small Business Direct Install	\$ 77,200	7,716	-18,790	\$ 934,600	
(4) Grand Total	\$ (2,415,700)	-66,031	-898,488	\$ (20,000,500)	

(a)	(b)	(c)
C&I Program	ELECTRIC Measure Name	Change in Planned Quantity (Gross Annual kWh) from 2025 to 2026
(1)	Large C&I New Construction	Advanced Building (417,454)
(2)	Large C&I New Construction	Air Cooled AC - 20-63 T (7,188)
(3)	Large C&I New Construction	Air Cooled AC - 5.4-11.25 T (134,962)
(4)	Large C&I New Construction	Air Cooled AC - over 63 T (16,713)
(5)	Large C&I New Construction	AirCChiller - IPLV (26,364)
(6)	Large C&I New Construction	AirCChiller - Peak (37,874)
(7)	Large C&I New Construction	AirCChiller - to150T (37,874)
(8)	Large C&I New Construction	AirHP - 11.25-20T (2,603)
(9)	Large C&I New Construction	AirHP - Pkg to5.4T (14,798)
(10)	Large C&I New Construction	Boiler, Draft Fan (3,542)
(11)	Large C&I New Construction	Boiler, Feedwater Pump (3,542)
(12)	Large C&I New Construction	Building Exhaust Fan (3,864)
(13)	Large C&I New Construction	Building Shell (33,196)
(14)	Large C&I New Construction	Chiller (345,117)
(15)	Large C&I New Construction	Chiller, Water Pump (3,542)
(16)	Large C&I New Construction	Commercial Electric Convection Oven (7,519)
(17)	Large C&I New Construction	Commercial Electric Fryer - Large (1,509)
(18)	Large C&I New Construction	Commercial Electric Griddle (3,549)
(19)	Large C&I New Construction	Commercial electric steamer (30,488)
(20)	Large C&I New Construction	Commercial Refrigeration (254,055)
(21)	Large C&I New Construction	Comprehensive Design (68,615)
(22)	Large C&I New Construction	Compressed Air (1,431,874)
(23)	Large C&I New Construction	Compressed Air Nozzle (8,250)
(24)	Large C&I New Construction	Conveyor Broiler - >28" wide (3,319)
(25)	Large C&I New Construction	Cooling Tower Fan (3,542)
(26)	Large C&I New Construction	Custom HVAC (952,912)
(27)	Large C&I New Construction	Demand Control Kitchen Ventilation (37,500)
(28)	Large C&I New Construction	DHW ECM Pump - <= 1/8 HP (977)
(29)	Large C&I New Construction	DHW ECM Pump - <=1/20 HP (1,298)
(30)	Large C&I New Construction	DHW ECM Pump - 1/8 to 1/6 HP (588)
(31)	Large C&I New Construction	DHW ECM Pump - 3/4 to 3 HP (1,298)
(32)	Large C&I New Construction	Dishwasher - High Temperature Multi Tank Conveyor (1,458)
(33)	Large C&I New Construction	Dishwasher - High Temperature Pots and Pans (407)
(34)	Large C&I New Construction	Dishwasher - Low Temperature Single Tank Conveyor (4,012)
(35)	Large C&I New Construction	Dishwasher - Low Temperature Under Counter (989)
(36)	Large C&I New Construction	Dual enthalpy economizer controls (2,994)
(37)	Large C&I New Construction	ECM Pump - <= 1/8 HP (28,718)
(38)	Large C&I New Construction	ECM Pump - <=1/20 HP (9,572)
(39)	Large C&I New Construction	Electric HW Spray Valve (20,334)
(40)	Large C&I New Construction	EMS (103,086)
(41)	Large C&I New Construction	FEI Rated Fans, Constant Speed (22,500)
(42)	Large C&I New Construction	FEI Rated Fans, Variable Speed (306,250)
(43)	Large C&I New Construction	Food Service (4,560)
(44)	Large C&I New Construction	Freezer Glass Door - <15 ft3 (254)
(45)	Large C&I New Construction	Freezer Glass Door - >50 ft3 (883)
(46)	Large C&I New Construction	Freezer Solid Door - <15 ft3 (1,010)
(47)	Large C&I New Construction	Freezer Solid Door - >50 ft3 (350)
(48)	Large C&I New Construction	Freezer Solid Door - 30 to 49.9 ft3 (6,118)
(49)	Large C&I New Construction	Hand Wrapper (3,130)
(50)	Large C&I New Construction	Heating Hot Water Pump (17,342)
(51)	Large C&I New Construction	High Efficiency Condensing Units - Floating Head Pressure Co (70,056)

(52)	Large C&I New Construction	High Efficiency Evaporating Units	(100,000)
(53)	Large C&I New Construction	High Volume Low Speed (HVLS) Fan	(75,000)
(54)	Large C&I New Construction	Hot Food Holding Bin	(18,750)
(55)	Large C&I New Construction	Hot Food Holding Cabinet - 1/2	(14,790)
(56)	Large C&I New Construction	Hot Food Holding Cabinet - 3/4	(2,504)
(57)	Large C&I New Construction	Hot Food Holding Cabinet - Full	(4,113)
(58)	Large C&I New Construction	HVAC Fan - Return	(17,342)
(59)	Large C&I New Construction	HVAC Fan - Supply	(17,342)
(60)	Large C&I New Construction	Ice Machine - Cont. Remote	(5,202)
(61)	Large C&I New Construction	Ice Machine - Ice Making Head	(20,034)
(62)	Large C&I New Construction	Ice Machine - Ice Self Contained	(1,650)
(63)	Large C&I New Construction	Ice Machine - Remote/Split	(4,042)
(64)	Large C&I New Construction	Induction Cooktop	(2,300)
(65)	Large C&I New Construction	Lighting Controls - Exterior	(122,850)
(66)	Large C&I New Construction	Lighting Controls - Integrated	(122,850)
(67)	Large C&I New Construction	Lighting Controls - Street Light Exterior	(30,700)
(68)	Large C&I New Construction	Lighting Controls, Custom	(43,655)
(69)	Large C&I New Construction	Lighting Systems, Custom	(20,613)
(70)	Large C&I New Construction	LOADCOMP-25HP	(225,000)
(71)	Large C&I New Construction	LOADCOMP-75HP	(225,000)
(72)	Large C&I New Construction	Low pressure drop filter	(8,250)
(73)	Large C&I New Construction	Make Up Air Fan	(2,236)
(74)	Large C&I New Construction	MFHR - Cooling	(7,534)
(75)	Large C&I New Construction	MFHR - DHW	(7,534)
(76)	Large C&I New Construction	MFHR - Heating	(7,534)
(77)	Large C&I New Construction	MFHR - Lighting	(7,534)
(78)	Large C&I New Construction	Motor	(69,768)
(79)	Large C&I New Construction	ODP-1200F	(2,236)
(80)	Large C&I New Construction	ODP-1200N	(2,236)
(81)	Large C&I New Construction	ODP-1200S	(2,236)
(82)	Large C&I New Construction	ODP-1800F	(2,236)
(83)	Large C&I New Construction	ODP-1800N	(2,236)
(84)	Large C&I New Construction	ODP-1800S	(2,236)
(85)	Large C&I New Construction	ODP-3600F	(2,236)
(86)	Large C&I New Construction	ODP-3600N	(2,236)
(87)	Large C&I New Construction	ODP-3600S	(2,236)
(88)	Large C&I New Construction	Other	(52,100)
(89)	Large C&I New Construction	Packaged Terminal Air Conditioner	(39,407)
(90)	Large C&I New Construction	PEI H2O PUMP - COMM, C	(26,401)
(91)	Large C&I New Construction	Performance Lighting - Tier 1 Exterior	(2,396)
(92)	Large C&I New Construction	Performance Lighting Tier 2 & 3 Exterior	(2,396)
(93)	Large C&I New Construction	Prescriptive Lighting - EXT-24/7	(54,734)
(94)	Large C&I New Construction	Prescriptive Lighting - EXT-DUSKDAWN	(174,499)
(95)	Large C&I New Construction	Process	(230,557)
(96)	Large C&I New Construction	Process Cooling	(318,192)
(97)	Large C&I New Construction	Process Exhaust Fan	(3,542)
(98)	Large C&I New Construction	Process, Cool Pump	(3,542)
(99)	Large C&I New Construction	Radiant Conveyor Toaster 120V	(22,500)
(100)	Large C&I New Construction	Radiant Conveyor Toaster 208V	(30,000)
(101)	Large C&I New Construction	Refrigerated Air Dryer - CAT<100	(22,860)
(102)	Large C&I New Construction	Refrigerated Air Dryer - CAT>400	(13,284)
(103)	Large C&I New Construction	Refrigerated Air Dryer - CAT-200	(9,871)
(104)	Large C&I New Construction	Refrigerated Air Dryer - CAT-300	(674)
(105)	Large C&I New Construction	Refrigerated Air Dryer - CAT-400	(883)
(106)	Large C&I New Construction	Refrigerated Chef Base - 74" to 89"	(1,966)
(107)	Large C&I New Construction	Refrigerator Glass Door - <15 ft3	(2,089)
(108)	Large C&I New Construction	Refrigerator Glass Door - >50 ft3	(1,387)

(109)	Large C&I New Construction	Refrigerator Glass Door - 15 to 29.9 ft3	(5,752)
(110)	Large C&I New Construction	Refrigerator Glass Door - 30 to 49.9 ft3	(11,360)
(111)	Large C&I New Construction	Refrigerator Solid Door - >50 ft3	(1,069)
(112)	Large C&I New Construction	Room Air Cleaner - K-12	(10,950)
(113)	Large C&I New Construction	Room Air Cleaner - Office	(10,950)
(114)	Large C&I New Construction	Room Air Cleaner - Retail	(10,950)
(115)	Large C&I New Construction	Sensors	(10,950)
(116)	Large C&I New Construction	Soup Wells	(750)
(117)	Large C&I New Construction	Split system AC to 5.4 tons	(60,836)
(118)	Large C&I New Construction	Steam Table	(1,500)
(119)	Large C&I New Construction	TEFC-1200F	(2,236)
(120)	Large C&I New Construction	TEFC-1200N	(2,236)
(121)	Large C&I New Construction	TEFC-1200S	(2,236)
(122)	Large C&I New Construction	TEFC-1800F	(2,236)
(123)	Large C&I New Construction	TEFC-1800N	(2,236)
(124)	Large C&I New Construction	TEFC-1800S	(2,236)
(125)	Large C&I New Construction	TEFC-3600F	(2,236)
(126)	Large C&I New Construction	TEFC-3600N	(2,236)
(127)	Large C&I New Construction	TEFC-3600S	(2,236)
(128)	Large C&I New Construction	Transformers	(3,788)
(129)	Large C&I New Construction	VARICOMP, 75HP	(92,176)
(130)	Large C&I New Construction	Vending Miser - Glass Front Refrigerated Coolers	(1,320)
(131)	Large C&I New Construction	Vending Miser - Non-Refrigerated Snack Vending Machines U	(1,320)
(132)	Large C&I New Construction	Vending Miser - Refrigerated Beverage Vending Machines UPS	(1,320)
(133)	Large C&I New Construction	VFD Secondary	(2,236)
(134)	Large C&I New Construction	VRF HP - 11.25T-20T	(395,290)
(135)	Large C&I New Construction	VRF HP - 5.4T-11.25T	(33,019)
(136)	Large C&I New Construction	VRF HP - over 20T	(21,651)
(137)	Large C&I New Construction	WCChill - 150-300T IPLV	(2,016)
(138)	Large C&I New Construction	WCChill - 150-300T IPLV_CEN	(2,016)
(139)	Large C&I New Construction	WCChill - 150-300T IPLV_SCR	(2,016)
(140)	Large C&I New Construction	WCChill - 150-300T PkKW	(2,016)
(141)	Large C&I New Construction	WCChill - 150-300T PkKW_CEN	(2,016)
(142)	Large C&I New Construction	WCChill - 150-300T PkKW_SCR	(2,016)
(143)	Large C&I New Construction	WCChill - 300-1000T IPLV	(2,016)
(144)	Large C&I New Construction	WCChill - 300-1000T PkKW	(2,016)
(145)	Large C&I New Construction	WCChill - 30-70T	(2,016)
(146)	Large C&I New Construction	WCChill - 70-150T	(2,016)
(147)	Large C&I New Construction	WCChill - over300T IPLV_CEN	(2,016)
(148)	Large C&I New Construction	WCChill - over300T IPLV_SCR	(2,016)
(149)	Large C&I New Construction	WCChill - over300T PkW_CEN	(2,016)
(150)	Large C&I New Construction	WCChill - over300T PkW_SCR	(2,016)
(151)	Large C&I New Construction	WCChill - to150T IPLV_CEN	(2,016)
(152)	Large C&I New Construction	WCChill - to150T IPLV_SCR	(2,016)
(153)	Large C&I New Construction	WCChill - to150T PkW_CEN	(2,016)
(154)	Large C&I New Construction	WCChill - to150T PkW_SCR	(2,016)
(155)	Large C&I New Construction	Zero loss condensate drain	(13,370)
(156)	Large C&I Retrofit	Boiler, Draft Fan	(133,951)
(157)	Large C&I Retrofit	Boiler, Feedwater Pump	(125,943)
(158)	Large C&I Retrofit	Building Shell	(30,143)
(159)	Large C&I Retrofit	Chiller, Water Pump	(122,672)
(160)	Large C&I Retrofit	Cooling Tower Fan	(114,991)
(161)	Large C&I Retrofit	Custom HVAC	(112,639)
(162)	Large C&I Retrofit	Custom process	(1,001,616)
(163)	Large C&I Retrofit	EMS 40k-80ksqft	(732,668)
(164)	Large C&I Retrofit	EMS 5k-40ksqft	(586,135)
(165)	Large C&I Retrofit	EMS 80k-200ksqft	(879,202)

(166)	Large C&I Retrofit	Food Service	(1,403)
(167)	Large C&I Retrofit	Heating Hot Water Pump	(88,864)
(168)	Large C&I Retrofit	HVAC Fan - Return	(23,025)
(169)	Large C&I Retrofit	LEDS	(2,037,469)
(170)	Large C&I Retrofit	Lighting Systems, Custom	(1,330,655)
(171)	Large C&I Retrofit	Make Up Air Fan	(82,658)
(172)	Large C&I Retrofit	Motor VFD Secondary	(160,133)
(173)	Large C&I Retrofit	MTVFD-BLDG EXHST FAN	(66,918)
(174)	Large C&I Retrofit	MTVFD-BOIL DRAFT FAN	(71,806)
(175)	Large C&I Retrofit	MTVFD-BOIL FWTR PUMP	(71,806)
(176)	Large C&I Retrofit	MTVFD-CHIL WATER PMP	(71,806)
(177)	Large C&I Retrofit	MTVFD-CT FAN	(71,806)
(178)	Large C&I Retrofit	MTVFD-HEAT HW PUMP	(9,060)
(179)	Large C&I Retrofit	MTVFD-HVAC RET FAN	(71,606)
(180)	Large C&I Retrofit	MTVFD-MK UP AIR FAN	(71,806)
(181)	Large C&I Retrofit	MTVFD-PROC COOL PUMP	(71,806)
(182)	Large C&I Retrofit	MTVFD-WATER/WST PUMP	(71,806)
(183)	Large C&I Retrofit	MTVFD-WSHP PUMP	(71,806)
(184)	Large C&I Retrofit	Non-refrigerated snack vending machine	(66,879)
(185)	Large C&I Retrofit	O & M	(602,818)
(186)	Large C&I Retrofit	Prescriptive Lighting - LED - Downstream	(5,237,313)
(187)	Large C&I Retrofit	Prescriptive Lighting - LED Replacement	(3,041,123)
(188)	Large C&I Retrofit	Prescriptive Lighting - Linear LED - Downstream	(359,181)
(189)	Large C&I Retrofit	Process Cooling	(100,930)
(190)	Large C&I Retrofit	Process, Cool Pump	(133,951)
(191)	Large C&I Retrofit	Process, Exhaust Fan	(133,951)
(192)	Large C&I Retrofit	Refrigerated beverage vending machine	(76,911)
(193)	Large C&I Retrofit	Transformers	(207,355)
(194)	Large C&I Retrofit	UPSTR Lighting - LED High/Low Bay	(3,604,918)
(195)	Large C&I Retrofit	UPSTR Lighting - LED Outdoor Control	(340,942)
(196)	Large C&I Retrofit	UPSTR Lighting - LED Stairwell	(282)
(197)	Large C&I Retrofit	VARICOMP - 25 HP	(163,088)
(198)	Large C&I Retrofit	VARICOMP - 75 HP	(160,040)
(199)	Large C&I Retrofit	VFD Secondary	(32,356)
(200)	Large C&I Retrofit	VSD-HVAC	(37,090)
(201)	Large C&I Retrofit	Water/Waste Pump	(133,951)
(202)	Small Business Direct Install	CUSTOM LIGHTING	(114,601)
(203)	Small Business Direct Install	Custom Motors/Drives, HVAC	(692,010)
(204)	Small Business Direct Install	Custom Motors/Drives, Non-HVAC	(352,000)
(205)	Small Business Direct Install	Freezer Recycling	(29,778)
(206)	Small Business Direct Install	Hot Water, Custom	(422,400)
(207)	Small Business Direct Install	HVAC, Custom	(841,500)
(208)	Small Business Direct Install	LED - Exterior HW	(6,993)
(209)	Small Business Direct Install	LED - Interior HW	(999,023)
(210)	Small Business Direct Install	LED - Interior SI	(340,016)
(211)	Small Business Direct Install	OCCUPANCY SENSORS	(217,194)
(212)	Small Business Direct Install	PROGRAMMABLE THERMOSTATS	(31,110)
(213)	Small Business Direct Install	VENDING MACHINES	(5,947)
(214)	Small Business Direct Install	Water Heating	(6,842)

	(a)	(b)	(c)
	C&I Program	GAS Measure Name	Change in Planned Quantity (Gross Annual MMBtu) from 2025 to 2026
(1)	Large C&I New Construction	Boiler - 96% AFUE	(25)
(2)	Large C&I New Construction	BOILER RESET 1 STAGE	(75)
(3)	Large C&I New Construction	Combo Condensing Boiler/ Water Heater - 95% AFUE	(891)
(4)	Large C&I New Construction	Comprehensive Design	(327)
(5)	Large C&I New Construction	Condensing Water Heater, 90%MIN 75-800	(252)
(6)	Large C&I New Construction	ERV - Fixed Plate UPSTR	(1,400)
(7)	Large C&I New Construction	ERV - Rotary Wheel UPSTR	(2,000)
(8)	Large C&I New Construction	Fryer, Upstream	(4,769)
(9)	Large C&I New Construction	Gas Oven Upstream - Convection Oven	(643)
(10)	Large C&I New Construction	Gas Oven Upstream- Combination Oven	(72)
(11)	Large C&I New Construction	Griddle, Upstream	(46)
(12)	Large C&I New Construction	Heat Recovery - All	(2,782)
(13)	Large C&I New Construction	Heat Recovery - Seasonal	(2,782)
(14)	Large C&I New Construction	Heat Recovery - Year Round	(2,776)
(15)	Large C&I New Construction	INFRARED HEATER - LOW INT	(2,128)
(16)	Large C&I New Construction	Low Flow Cooking Spray Nozzle, Upstream	(513)
(17)	Large C&I New Construction	Other Gas - All	(117)
(18)	Large C&I New Construction	Other Gas - Seasonal	(930)
(19)	Large C&I New Construction	Other Gas - Year Round	(1,597)
(20)	Large C&I New Construction	Steam boiler	(793)
(21)	Large C&I New Construction	Steamer, Upstream	(163)
(22)	Large C&I New Construction	Water Heater - On-Demand 90	(496)
(23)	Large C&I New Construction	Water Heating Boiler - 94% TE	(10,667)
(24)	Large C&I Retrofit	Custom Other	(6,644)
(25)	Large C&I Retrofit	Heat Recovery - All	(1,763)
(26)	Large C&I Retrofit	Heat Recovery - Seasonal	(1,763)
(27)	Large C&I Retrofit	Heat Recovery - Year Round	(1,763)
(28)	Large C&I Retrofit	HVAC - Controls and EMS	(2,534)
(29)	Large C&I Retrofit	HVAC - Equipment	(10,870)
(30)	Large C&I Retrofit	Operation & Maintenance	(12,621)
(31)	Large C&I Retrofit	Other Gas - All	(281)
(32)	Large C&I Retrofit	Programmable thermostat	(83)
(33)	Large C&I Retrofit	Steam Trap HVAC - High Pressure	(1,452)
(34)	Large C&I Retrofit	Steam Trap HVAC - Low Pressure	(1,452)
(35)	Large C&I Retrofit	Steam Trap, Custom - Low Pressure	(18,618)
(36)	Large C&I Retrofit	Ventilation Reduction	(1,786)
(37)	Large C&I Retrofit	Verified savings	(4,026)
(38)	Large C&I Retrofit	VSDs - Non-HVAC	(7,187)
(39)	Large C&I Retrofit	WiFi Thermostat - Heat Only, Custom	(304)
(40)	Large C&I Retrofit	WiFi Thermostat Gas - Cooling and Heating	(396)
(41)	Large C&I Retrofit	WiFi Thermostat Gas - Heating	(396)
(42)	Small Business Direct Install	DHW	(400)
(43)	Small Business Direct Install	Duct Insulation	(1,000)
(44)	Small Business Direct Install	HVAC - Equipment	(911)
(45)	Small Business Direct Install	Insulation Pipe H2O - Diameter 1.5in	(12)
(46)	Small Business Direct Install	Insulation Pipe H2O - Diameter 2in	(200)
(47)	Small Business Direct Install	Insulation Pipe Steam - Diameter 1.5in	(100)
(48)	Small Business Direct Install	Insulation Pipe Steam - Diameter 2in	(100)
(49)	Small Business Direct Install	Low-flow showerhead	(382)
(50)	Small Business Direct Install	Other, Custom	(3,000)
(51)	Small Business Direct Install	Pipe/Tank/Duct/HVAC Insulation	(100)
(52)	Small Business Direct Install	Pre-rinse spray valve	(548)
(53)	Small Business Direct Install	Programmable thermostat	(1,087)
(54)	Small Business Direct Install	WiFi Thermostat - cooling and htg	(25)
(55)	Small Business Direct Install	WiFi Tstat-heat only	(25)
(56)	C&I Multifamily	Faucet aerator	(2)
(57)	C&I Multifamily	Heating, Custom	(823)
(58)	C&I Multifamily	Hot Water, Custom	(20)
(59)	C&I Multifamily	Low Flow Showerhead	(86)
(60)	C&I Multifamily	Pipe Wrap (Water Heating)	(120)
(61)	C&I Multifamily	Programmable thermostat	(16)

Division 1-5  
Budget, Savings, and Benefits

Request:

Bates Pages 26 and 27 state: "Priority Actions for the Thermal Sector: Continue Energy Efficiency Programs and Weatherization: Weatherization programs remain a focus of both residential and income-eligible services ("IES") programs. The Company collaborates with weatherization contractors and Community Action Agencies to continually refine the delivery mechanisms for weatherization services to both expand their reach and reduce barriers to participation."

- a. Please provide the following data for weatherization measures in the electric plan: quantities, budget/spending, annual and lifetime savings, and benefits for 2024 (actuals), 2025 (planned), 2025 (estimated through year end), and 2026 (proposed) by heating fuel type and by program and in total.
- b. Please provide the following data for weatherization measures in the gas plan: quantities, budget/spending, annual and lifetime savings, and benefits for 2024 (actuals), 2025 (planned), 2025 (estimated through year end), and 2026 (proposed) by program and in total.

Response:

- a. Please see Attachment Division 1-5 for a table displaying the requested electric portfolio weatherization measures. Please note that the Company does not collect measure-level actual spending, so 2024 and 2025 actual spending is unavailable. The Company also does not yet have measure-level benefits for 2025 year-to-date results.
- b. Please see Attachment Division 1-5 for a table displaying the requested gas portfolio weatherization measures. Please note that the Company does not collect measure-level actual spending, so 2024 and 2025 actual spending is unavailable. The Company also does not yet have measure-level benefits for 2025 year-to-date results.

Please note that values in Attachment Division 1-5 have been updated to reflect the correction identified in the Company's response to Division 1-35.

a) Table 1. Quantities, Budget, Annual and Lifetime Savings, and Benefits for Electric Portfolio Weatherization Measures

(a)	(b)	(c) 2024 Actuals				(e) 2025 Planned				(g) 2025 YTD Actuals				(i) 2026 Planned					
		(d) Quantity	(f) Total Net Annual Savings (Total MMBtu)	(h) Total Net Lifetime Savings (Total MMBtu)	(j) Benefits	(k) Quantity	(m) Incentive Budget	(n) Total Net Annual Savings (Total MMBtu)	(o) Total Net Lifetime Savings (Total MMBtu)	(p) Benefits	(q) Quantity	(r) Incentive Budget	(s) Total Net Annual Savings (Total MMBtu)	(t) Total Net Lifetime Savings (Total MMBtu)	(u) Benefits				
1	EnergyWise Single Family	Pre-weatherization	0	0.00	0.00	\$0.00	715	\$178,750.00	0	0	\$0.00	41	0.00	0.00	800	\$200,000.00	0.00	0.00	\$0.00
2	EnergyWise Single Family	Weatherization, Delayed HP conversion of electric resistance	-	-	-	-	-	-	-	-	-	-	-	-	220	\$880,000.00	522.90	10457.99	\$1,227,096.79
3	EnergyWise Single Family	Weatherization, Delayed HP conversion of oil	-	-	-	-	-	-	-	-	-	-	-	-	900	\$2,385,000.00	5927.84	118556.83	\$5,473,294.70
4	EnergyWise Single Family	Weatherization, Delayed HP conversion of propane	-	-	-	-	-	-	-	-	-	-	-	-	120	\$276,000.00	790.38	15807.58	\$1,110,481.84
5	EnergyWise Single Family	Weatherization, Electric Resistance	430	1021.14	20422.87	\$12,857,878.51	330	\$1,320,000.00	783.84	15676.74	\$2,104,847.30	247	586.56	11733.80	220	\$880,000.00	847.09	16941.81	\$1,486,761.40
6	EnergyWise Single Family	Weatherization, Heat Pump	-	-	-	-	-	-	-	-	-	-	-	-	0	\$0.00	0.00	0.00	\$0.00
7	EnergyWise Single Family	Weatherization, Oil	1733	19898.13	397962.52	\$6,718,426.51	1498	\$3,969,700.00	17201.11	344022.14	\$14,967,178.14	630	7233.59	144682.64	300	\$795,000.00	3444.81	68896.29	\$2,845,540.14
8	EnergyWise Single Family	Weatherization, Others	162	1860.07	37201.34	\$2,049,834.03	200	\$460,000.00	2296.54	45930.86	\$3,324,316.90	20	1010.41	20209.64	40	\$92,000.00	459.31	9186.17	\$637,372.25
9	Income Eligible Single Family	Weatherization, Delayed HP conversion of electric resistance	-	-	-	-	-	-	-	-	-	-	-	-	42	\$231,000.00	53.09	1061.88	\$746,550.43
10	Income Eligible Single Family	Weatherization, Delayed HP conversion of oil	-	-	-	-	-	-	-	-	-	-	-	-	173	\$951,500.00	885.18	17703.60	\$3,540,937.81
11	Income Eligible Single Family	Weatherization, Delayed HP conversion of propane	-	-	-	-	-	-	-	-	-	-	-	-	8	\$44,000.00	28.66	573.18	\$168,114.27
12	Income Eligible Single Family	Weatherization, Electric Resistance	23	96.60	1932.08	\$407,952.64	190	\$1,045,000.00	798.03	15960.65	\$3,974,230.77	27	113.40	2268.09	42	\$231,000.00	85.41	1708.18	\$773,154.55
13	Income Eligible Single Family	Weatherization, Heat Pump	-	-	-	-	-	-	-	-	-	-	-	-	0	\$0.00	0.00	0.00	\$0.00
14	Income Eligible Single Family	Weatherization, Oil	257	3424.30	68486.08	\$3,593,238.81	237	\$1,303,500.00	3157.82	63156.42	\$3,499,530.82	153	2038.59	40771.87	57	\$313,500.00	500.84	10016.73	\$1,311,593.09
15	Income Eligible Single Family	Weatherization, Other	9	110.86	2217.12	\$219,184.17	21	\$15,500.00	258.66	5173.27	\$658,380.03	3	36.95	739.04	2	\$11,000.00	12.17	243.46	\$48,813.30

b) Table 2. Quantities, Budget, Annual and Lifetime Savings, and Benefits for Gas Portfolio Weatherization Measures

(a)	(b)	(c) 2024 Actuals				(e) 2025 Planned				(g) 2025 YTD Actuals				(i) 2026 Planned					
		(d) Quantity	(f) Total Net Annual Savings (Total MMBtu)	(h) Total Net Lifetime Savings (Total MMBtu)	(j) Benefits	(k) Quantity	(m) Incentive Budget	(n) Total Net Annual Savings (Total MMBtu)	(o) Total Net Lifetime Savings (Total MMBtu)	(p) Benefits	(q) Quantity	(r) Incentive Budget	(s) Total Net Annual Savings (Total MMBtu)	(t) Total Net Lifetime Savings (Total MMBtu)	(u) Benefits				
1	EnergyWise Single Family	Weatherization	2425	30099.99	601999.85	\$12,679,278.18	2362	\$7,971,750.00	29315.60	586311.91	\$16,438,850.84	1282	15912.66	318226.87	2250	\$7,593,750.00	27925.52	558510.50	\$14,630,170.05
2	EnergyWise Single Family	Weatherization, Delayed HP conversion of gas	-	-	-	-	-	-	-	-	-	-	-	-	750	\$2,531,250.00	5267.95	105339.03	\$3,370,314.47
3	Income Eligible Single Family	Weatherization	366	4654.54	93090.75	\$5,931,448.94	350	\$2,208,850.00	4451.06	89021.21	\$6,248,350.06	279	3548.13	70962.62	277	\$1,689,700.00	2655.49	53109.81	\$4,546,914.69
4	Income Eligible Single Family	Weatherization, Delayed HP conversion of gas	-	-	-	-	-	-	-	-	-	-	-	-	93	\$567,300.00	510.03	10200.68	\$1,380,448.56

Division 1-6  
Budget, Savings, and Benefits

Request:

Bates Page 27 states: “Target 15 Percent Penetration of Energy Efficient Electric Heating by 2030: The Plans continue the Company’s efforts to support the adoption of electric heating, with a particular emphasis on electric resistance heating customers.”

- a. Please provide RIE’s actual accomplishments through 2024 relative to this goal.
- b. Please provide the contributions of RIE’s approved 2025 and proposed 2026 plans to this goal.

Response:

The 15 percent target quoted is from the Rhode Island Executive Climate Change Coordinating Council’s (“EC4”) 2022 Update to the 2016 Greenhouse Gas Emissions Reduction Plan (“2022 Update”) and refers to a conversion of 15 percent of Rhode Island’s buildings from fossil fuel heat to efficient electric heating by 2030. As stated on Bates pages 25-27, the energy savings achieved by Rhode Island Energy’s energy efficiency programs directly advance priority actions identified in the 2022 Update. The 15 percent target is the State’s target, which may be met through a number of programs and policies. The 15 percent target is not specific to or adopted by the Company. Programs and policies external to the Company can and will support the State in meeting its 15 percent target.

- a. Please see Table 1 for the quantities of energy efficient electric heating through 2024.

**Table 1**

	(a)	(b)
(1)	<b>Program</b>	<b>Actual Installed Quantities through 2024</b>
(2)	Residential	20,150 units of equipment
(3)	Income Eligible	175 units of equipment
(4)	C&I	4,068,534 kWh <sup>(1,2)</sup>

<sup>(1)</sup> C&I quantities are available as gross annual kWh savings and not units of equipment.

<sup>(2)</sup> C&I “actual installed quantities though 2024” reflect 2023 and 2024 gross annual kWh savings. Installed quantities prior to 2023 (2010-2022) are in units of equipment (501), not gross annual kWh savings.

Division 1-6, Page 2  
Budget, Savings, and Benefits

- b. Please see Table 2 for the quantities of energy efficient electric heating from the 2025 Annual Plan and 2026 Proposed Annual Plan.

**Table 2**

	(a)	(b)	(c)
(1)	<b>Program</b>	<b>2025 Approved Goal</b>	<b>2026 Proposed Goals</b>
(2)	Residential	2,982 units of equipment MF <sup>(1)</sup> : 96,000 kWh <sup>(2)</sup>	4,504 ton <sup>(3)</sup> MF: 28,800 kWh <sup>(2)</sup>
(3)	Income Eligible	190 units of equipment MF: 463,000 kWh <sup>(2)</sup>	280 ton <sup>(3)</sup> MF: 225,000 kWh <sup>(2)</sup>
(4)	C&I	1,966,330 kWh <sup>(2)</sup>	2,221,988 kWh <sup>(2)</sup>

<sup>(1)</sup> “MF” means multifamily.

<sup>(2)</sup> C&I and multifamily quantities are available as gross annual kWh savings and not units of equipment.

<sup>(3)</sup> Single family quantities are planned in tonnage rather than units of equipment in the 2026 Plan.

Division 1-7  
Budget, Savings, and Benefits

Request:

Bates Page 27 states: "Efficient Heat Pump Incentives: Several programs outlined in the Plans offer incentives for efficient heat pumps, both for space and water heating. The Company has collaborated with OER on their Clean Heat RI Program and will continue the collaboration to align program incentives for heat pump technologies with IRA incentives."

- a. Please provide the following data for heat pump measures for space heating in the electric plan: quantities, budget/spending, annual and lifetime savings, and benefits for 2024 (actuals), 2025 (planned), 2025 (estimated through year end), and 2026 (proposed) by heating fuel type and by program and in total.
- b. Please provide the following data for heat pump measures for space heating in the gas plan: quantities, budget/spending, annual and lifetime savings, and benefits for 2024 (actuals), 2025 (planned), 2025 (estimated through year end), and 2026 (proposed) by program and in total.
- c. Please provide the following data for heat pump measures for water heating in the electric plan: quantities, budget/spending, annual and lifetime savings, and benefits for 2024 (actuals), 2025 (planned), 2025 (estimated through year end), and 2026 (proposed) by heating fuel type and by program and in total.
- d. Please provide the following data for heat pump measures for water heating in the gas plan: quantities, budget/spending, annual and lifetime savings, and benefits for 2024 (actuals), 2025 (planned), 2025 (estimated through year end), and 2026 (proposed) by program and in total.

Response:

- a. Please see Attachment Division 1-7 for a table displaying the requested data for heat pump measures for space heating in the electric plan. Please note that the Company does not collect measure-level actual spending, so 2024 and 2025 actual spending is unavailable. The Company also does not yet have measure-level benefits for 2025 year-to-date results.
- b. No heat pump measures for space heating in the gas portfolio have returned 2024 actuals or been planned in 2025 or 2026.

Division 1-7, Page 2  
Budget, Savings, and Benefits

- c. Please see Attachment Division 1-7 for a table displaying the requested data for heat pump measures for water heating in the electric plan. Please note that the Company does not collect measure-level actual spending, so 2024 and 2025 actual spending is unavailable. The Company also does not yet have measure-level benefits for 2025 year-to-date results.
- d. No heat pump measures for water heating in the gas portfolio have returned 2024 actuals or been planned in 2025 or 2026.

Please note that values in Attachment Division 1-7 have been updated to reflect the correction identified in the Company's response to Division-1-35.

a) Table 1. Quantities, Budget, Annual and Lifetime Savings, and Benefits of Electric Heat Pump Measures for Space Heating

(a)	(b)	2024 Actuals			2025 Planned			2025 YTD			2026 Planned								
		(c) Quantity	(d) Total Net Annual Savings (Total MMBtu)	(e) Total Net Lifetime Savings (Total MMBtu)	(f) Benefits	(g) Quantity	(h) Incentive Budget	(i) Total Net Annual Savings (Total MMBtu)	(j) Total Net Lifetime Savings (Total MMBtu)	(k) Benefits	(l) Quantity	(m) Total Net Annual Savings (Total MMBtu)	(n) Total Net Lifetime Savings (Total MMBtu)	(o) Quantity	(p) Incentive Budget	(q) Total Net Annual Savings (Total MMBtu)	(r) Total Net Lifetime Savings (Total MMBtu)	(s) Benefits	
Residential HVAC	Central Heat Pump	586.00	2697.67	53953.34	\$2,897,177	680.00	\$714,000	3112.61	62252.21	\$3,771,613	140.00	590.48	11809.61	-	-	-	-	-	-
Residential HVAC	Central Heat Pump (per ton)	-	-	-	-	-	-	-	-	-	-	-	-	833.50	\$555,111	3590.78	71815.64	\$6,963,876	-
Residential HVAC	Electric Resistance to MSHP (per ton)	-	-	-	-	-	-	-	-	-	-	-	-	900.00	\$1,350,000	7028.28	119480.73	\$8,609,994	-
Residential HVAC	Electric Resistance to MSHP	277.00	5632.55	95753.35	\$3,799,287	590.00	\$1,917,500	11931.21	202830.62	\$13,730,988	96.00	1698.68	28877.58	-	-	-	-	-	-
Residential HVAC	MiniSplit HP	2170.00	3806.39	64708.57	\$3,260,450	1692.00	\$778,320	2951.07	50168.13	\$3,168,782	739.00	1206.94	20517.94	-	-	-	-	-	-
Residential HVAC	MiniSplit HP (per ton)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EnergyWise Single Family	Electric Resistance to MSHP (per ton)	-	-	-	-	-	-	-	-	-	-	-	-	2749.15	\$1,033,680	7477.11	127110.90	\$6,212,565	-
EnergyWise Single Family	Electric Resistance to MSHP	5.00	105.58	1794.93	\$73,148	20.00	\$88,000	422.32	7179.51	\$486,030	4.00	84.47	1435.91	-	-	-	-	-	-
EnergyWise Multifamily	Heat Pumps	0.00	0.00	0.00	\$0	96000.00	\$326,400	327.55	6551.04	\$376,885	0.00	0.00	28800.00	\$66,960	\$66,960	84.59	1691.86	\$88,223	-
Income Eligible Single Family	MSHP - Electric Resistance (per ton)	-	-	-	-	-	-	-	-	-	-	-	-	280.00	\$1,960,000	2416.11	41073.79	\$2,959,850	-
Income Eligible Single Family	MSHP - Electric Resistance	64.00	1430.09	24311.56	\$1,346,311	190.00	\$3,040,000	4245.59	72174.96	\$4,886,015	15.00	372717.07	6336190.11	-	-	-	-	-	-
Income Eligible Multifamily	Heat Pumps	0.00	0.00	0.00	\$0	463000.00	\$1,430,670	1579.76	31595.12	\$1,817,686	0.00	0.00	225000.00	\$697,500	\$697,500	768.47	15369.35	\$801,440	-
Large C&I New Construction	AirHP - 11.25-20T	0.00	0.00	0.00	\$0	2603.00	\$326	6.64	79.72	\$5,968	3.00	112.05	1344.46	0.00	\$0	0.00	0.00	\$0	-
Large C&I New Construction	AirHP - 5.4-11.25T	4.00	40.88	490.51	\$22,226	4020.00	\$598	10.26	123.12	\$7,826	2.00	19.52	234.17	20750.00	\$3,089	52.96	635.49	\$35,633	-
Large C&I New Construction	AirHP - over20T	0.00	0.00	0.00	\$0	0.00	\$0	0.00	0.00	\$0	1.00	43.64	523.61	0.00	\$0	0.00	0.00	\$0	-
Large C&I New Construction	AirHP - Pkg to5.4T	64.00	217.48	2609.77	\$125,960	125098.00	\$50,039	319.27	3831.27	\$243,551	54.00	247.57	29697.74	110300.00	\$44,120	281.51	3378.06	\$189,413	-
Large C&I New Construction	VRFP - 11.25T-20T	4.00	66.77	1135.14	\$44,633	457420.00	\$143,217	1225.79	20838.38	\$1,082,590	2.00	77.45	1316.93	621300.00	\$19,453	166.50	2830.42	\$125,634	-
Large C&I New Construction	VRFP - 5.4T-11.25T	108.00	1074.30	18263.14	\$705,245	1032719.00	\$273,798	2767.46	47046.90	\$2,444,167	49.00	1075.94	18290.78	999700.00	\$265,043	2678.98	45542.67	\$2,021,505	-
Large C&I New Construction	VRFP - over 20T	0.00	0.00	0.00	\$0	21651.00	\$4,914	58.02	986.34	\$51,242	0.00	0.00	0.00	0.00	\$0	0.00	0.00	\$0	-
Large C&I New Construction	VRFP - to 5.4T	0.00	0.00	0.00	\$0	0.00	\$0	0.00	0.00	\$0	0.00	0.00	0.00	\$0	\$0	0.00	0.00	\$0	-
Large C&I New Construction	Water Source Heat Pump	223.00	275.89	3310.73	\$334,107	3276.00	\$1,638	8.78	131.68	\$6,119	0.00	0.00	0.00	101720.00	\$50,860	272.59	4088.82	\$160,161	-

c) Table 2. Quantities, Budget, Annual and Lifetime Savings, and Benefits of Electric Heat Pump Measures for Water Heating

(a)	(b)	2024 Actuals			2025 Planned			2025 YTD			2026 Planned								
		(c) Quantity	(d) Total Net Annual Savings (Total MMBtu)	(e) Total Net Lifetime Savings (Total MMBtu)	(f) Benefits	(g) Quantity	(h) Incentive Budget	(i) Total Net Annual Savings (Total MMBtu)	(j) Total Net Lifetime Savings (Total MMBtu)	(k) Benefits	(l) Quantity	(m) Total Net Annual Savings (Total MMBtu)	(n) Total Net Lifetime Savings (Total MMBtu)	(o) Quantity	(p) Incentive Budget	(q) Total Net Annual Savings (Total MMBtu)	(r) Total Net Lifetime Savings (Total MMBtu)	(s) Benefits	
Residential HVAC	HPWH, Electric - <55 gallon	49.00	266.19	3460.48	\$175,431	26.00	\$16,250	141.53	1840.12	\$112,968	14.00	76.22	990.83	49.00	\$30,625	266.76	4001.44	\$210,433	-
Residential HVAC	HPWH, Electric - <55 gallon, Midstream	-	-	-	-	-	-	-	-	-	0.00	0.00	49.00	\$30,625	266.76	4001.44	\$210,433	-	-
Residential HVAC	HPWH, Electric - >55 gallon, UEF 2.70	131.00	149.65	1945.41	\$89,810	254.00	\$38,100	290.78	3780.11	\$226,515	59.00	62.97	818.53	179.00	\$26,850	204.92	3073.77	\$161,593	-
Residential HVAC	HPWH, Electric - >55 gallon, UEF 2.70, Midstream	-	-	-	-	-	-	-	-	-	0.00	0.00	131.00	\$19,650	149.97	2249.52	\$118,261	-	-
Income Eligible Single Family	HP Water Heaters	1.00	5.84	87.62	\$3,851	4.00	\$8,524	23.37	350.48	\$19,997	3.00	17.52	262.86	35.00	\$105,000	204.45	3066.71	\$164,406	-

Division 1-8  
Budget, Savings, and Benefits

Request:

Bates Pages 44 states: “The Residential Consumer Products program will also offer new measures, including ENERGY STAR Most Efficient dehumidifiers, ENERGY STAR Most Efficient air cleaners, and room air conditioner recycling.” Please provide the increase in budget, annual and lifetime savings, and benefits associated with this change.

Response:

Table 1 below provides an overview of the increase in budget, annual and lifetime savings, and benefits associated with the introduction of new Residential Consumer Products offerings.

**Table 1. Budget, Annual and Lifetime Savings, and Benefits of New Measure Offerings**

	(a)	(b)	(c)	(d)	(e)
	<b>Measure Name</b>	<b>Total Incentive Budget</b>	<b>Net Annual Savings (MWh)</b>	<b>Net Lifetime Savings (MWh)</b>	<b>Benefits</b>
1	Dehumidifier Most Efficient	\$1,875	2.37	40.31	\$7,629
2	Room AC Recycling	\$42,000	389.20	1556.80	\$787,385
3	Room Air Cleaner Most Efficient	\$2,205	5.77	51.97	\$12,039
4	<b>Total</b>	<b>\$46,080</b>	<b>397.35</b>	<b>1649.08</b>	<b>\$807,053</b>

Division 1-9  
Budget, Savings, and Benefits

Request:

Bates Pages 54 and 55 state: “The 2026 Annual Plan, however, introduces several refinements to C&I programs with a focus on cost-effectiveness, market transformation, and alignment with climate goals. Below is a list of these refinements:

- Incentives for non-controlled LED lighting will be phased out by 2027, with 2026 serving as a transition year emphasizing lighting controls and performance lighting.
- The Combined Heat and Power (“CHP”) program will see reduced incentives and stricter eligibility, requiring projects to achieve at least 45 percent carbon reduction.
- The New Construction Program will adopt more stringent Energy Use Intensity ranges, aligning with neighboring states and encouraging higher-efficiency building design.
- The Retrofit Program will expand midstream offerings to include HVAC and food service equipment and enhance building analytics and benchmarking initiatives to identify deeper savings opportunities.
- Outreach efforts will continue to target microbusinesses and Women and Minority-Owned Enterprises through the Small Business Direct Install Program and the Main Streets Initiative.”
  - a. For each of these components, please provide the change to the 2026 proposed electric budget, annual and lifetime savings, and benefits by program and in total.
  - b. For each of these components, please provide the change to the 2026 proposed gas budget, annual and lifetime savings, and benefits by program and in total.
  - c. Regarding ‘incentives for non-controlled LED lighting’, please provide the change in quantities. Please confirm which programs provide these measures.
  - d. Regarding ‘expanding midstream offerings to include HVAC and food service equipment and enhancing building analytics and benchmarking initiatives to identify deeper savings opportunities’ for the Retrofit Program, please provide the change in quantities. Please also clearly identify which measures are associated with the electric

Division 1-9, Page 2  
Budget, Savings, and Benefits

portion of the plan versus the gas portion of the plan and which programs provide these measures.

Response:

The Company is correcting the testimony found on Bates page 54, lines 18-20 to:

“The Retrofit Program will enhance building analytics and benchmarking initiatives to identify deeper savings opportunities.”

The language regarding the Midstream offerings HVAC and food service included in the original testimony on Bates Page 54, lines 18-20 should be deleted.

- a. The following components listed on Bates pages 54 and 55 are not directly reflected in changes to the 2026 proposed electric budget, annual and lifetime savings, and benefits by program (collectively “Electric Plan”). An explanation is provided.
- “Combined Heat and Power reduced incentives and stricter eligibility”: budgets and savings are not included in the 2026 proposed Electric Plan.
  - “New Construction Program more stringent Energy Use Intensity ranges”: New construction projects initiated in 2026 that will be subject to the stricter Energy Use Intensity ranges (Pathway 1 as described on Bates page 212) and are unlikely to be completed and paid in 2026.
  - “The Retrofit Program will enhance building analytics and benchmarking initiatives to identify deeper savings opportunities”: measures identified through these two initiatives will vary based on the facility and therefore, the Company did not modify Retrofit Program quantities to directly reflect the contribution of these two initiatives.
  - “Outreach efforts to target microbusinesses through the Small Business Direct Install Program”: these targeted marketing efforts are continued from 2025 so there are no direct Electric Plan impacts from this component. However, the overall electric marketing budget for the Small Business Direct Install Program is being reduced from 2025 (\$207.2 thousand) to 2026 (\$165.8 thousand).

Division 1-9, Page 3  
Budget, Savings, and Benefits

The change to the 2026 proposed electric budget, annual and lifetime savings, and benefits by program and in total for non-controlled lighting are provided in Table 1 below.

Table 1: Change to 2026 Non-Controlled Lighting Proposed Electric Budget, Annual and Lifetime Savings and Benefits by Program

C&I Programs	(a) Change to 2026 Proposed Electric Budget (\$)	(b) Change to 2026 Proposed Gross Annual Savings (MWh)	(c) Change to 2026 Proposed Net Lifetime Savings (MWh)	(d) Change to 2026 Proposed Benefits (\$)
Large C&I Retrofit	\$(556,417)	2,110	(1,616)	\$(4,896,807)
Small Business Direct Install	\$(1,448,634)	(1,425)	(3,963)	\$(1,333,738)
<b>Grand Total</b>	<b>\$(2,005,051)</b>	<b>685</b>	<b>(5,579)</b>	<b>\$(6,230,545)</b>

- b. The following components listed on Bates pages 54 and 55 are not directly reflected in changes to the 2026 proposed gas budget, annual and lifetime savings, and benefits by program (collectively “Gas Plan”). An explanation is provided.
- “Combined Heat and Power reduced incentives and stricter eligibility”: incentives and savings for CHP projects are not included in the Gas Plan.
  - “New Construction Program more stringent Energy Use Intensity ranges”: New construction projects initiated in 2026 that will be subject to the stricter Energy Use Intensity ranges (Pathway 1 as described on Bates page 212) and are unlikely to be completed and paid in 2026.
  - “Outreach efforts to target microbusinesses through the Small Business Direct Install Program”: these targeted marketing efforts are continued from 2025 so there are no direct Gas Plan impacts from this component. However, the overall electric marketing budget for the Small Business Direct Install Program is being reduced from 2025 (\$30.4 thousand) to 2026 (\$24.5 thousand).
  - “The Retrofit Program will enhance building analytics and benchmarking initiatives to identify deeper savings opportunities”: measures identified through these two initiatives will vary based on the facility and therefore, the Company

Division 1-9, Page 4  
Budget, Savings, and Benefits

did not modify Retrofit Program quantities to directly reflect the contribution of these two initiatives.

- “Incentives for non-controlled LED lighting”: incentives and savings for non-controlled LED lighting projects are included in the Electric Plan, not the Gas Plan.
- c. Non-controlled LED lighting quantities are provided in Table 1 above, column (c). The Company uses “gross annual kWh savings” in the energy efficiency planning process.
- d. Measures identified through the Building Analytics and Benchmarking Initiatives are included in the Company’s Retrofit Program and measures may be funded through the electric or gas budgets, which is determined by the actual installed measure (e.g. a change in air conditioning temperature set points will reduce electric usage while a change in heating temperature set points will reduce natural gas usage). Additionally, the installed measures will vary based on the facility and the specific measures identified through these two initiatives. Therefore, the Company did not make specific modifications to Retrofit Program quantities to reflect the continued enhancement of these two initiatives.

Division 1-10  
Budget, Savings, and Benefits

Request:

Bates Page 168 states: "Rhode Island Energy will conduct a comprehensive review of appliances offered to income-eligible customers through its appliance replacement program with the goal of removing product models that have higher costs but similar savings to other models. The Income Eligible program funds 100% of the cost of these appliance replacements, and appliances such as certain types of refrigerators can become costly. The program is a give-to-get program, where customers give their old, inefficient refrigerator that RIE recycles and receives a similar, energy-efficient replacement in exchange. In the past, a small percentage of customers were recycling and replacing high-end refrigerators (counter-depth, French door models), for which efficient models can cost upwards of \$3,000. Capping the costs will reduce program costs overall, and the number of customers impacted is expected to be small. If the customer chooses an energy-efficient appliance that is no longer on the list of fully subsidized items, Rhode Island Energy will cap the amount it will pay for the appliance and allow the customer to pay the difference. This change is designed to encourage customers to choose appliances that deliver quality and energy savings at a lower price. Simultaneously, Rhode Island Energy will conduct a review of vendor fees associated with appliance replacement and delivery with the goal of eliminating extraneous costs. The program's Lead Vendor will take additional steps to vet contractor bids for replacing electric resistance heat systems with heat pumps. In recent years, the cost for this measure has increased and 2026 will see a more rigorous review of labor versus material costs to encourage cost-competitive bids."

- a. Please provide the change to the 2026 proposed electric budget due to these efforts.
- b. Please identify if there is any change to the 2026 proposed electric annual savings, lifetime savings, and benefits due to these efforts.
- c. Please identify if there is any change to the 2026 proposed gas budget and associated savings and benefits due to these efforts.

Response:

- a. These efforts are new cost management efforts that will be introduced in 2026. The Company does not yet know the impact of these efforts and therefore did not make any adjustments to the 2026 electric budget due to these efforts.
- b. There are no changes to the 2026 proposed electric annual savings, lifetime savings, or benefits due to these efforts.

Division 1-10, Page 2  
Budget, Savings, and Benefits

- c. There are no changes to the 2026 proposed gas budget or associated savings and benefits due to these efforts.

Division 1-11  
Budget, Savings, and Benefits

Request:

Please refer to Table E-1A: Rhode Island Energy Summary of 2026 Energy Efficiency Charge (\$000) on Bates Page 318. This table shows a projected fund balance of \$13.5 million from underspending the 2025 EE Plan.

- a. Why does RIE project such a significant underspending in 2025?
- b. What adjustments did RIE make to the 2026 EE Plan to account for the underspending in 2025?

Response:

- a. The 2025 budget underspend can be attributed mostly to the Commercial and Industrial ("C&I") sector, which is projected to spend about 80% of its total budget by the end of 2025. Underspend for the entire 2025 portfolio is projected at \$6.85 million, \$6.70 million of which is attributed to the C&I sector.

Budget underspend, however, is not the only contributor to the projected fund balance. Other factors which contributed to the projected fund balance are:

- The 2024 year-end fund balance, before deduction of the Performance Incentive payout, was \$0.6 million lower than the forecast that was used to calculate the Energy Efficiency charge for 2025, resulting in a lower fund balance. This one factor would actually reduce the projected 2025 fund balance in question, but the subsequent factors contribute to its overall increase.
- At the time the Energy Efficiency charge for 2025 was calculated, the 2024 Performance Incentive was forecasted at \$1.7 million, and this forecasted deduction was incorporated into that Energy Efficiency charge calculation for 2025. The actual Performance Incentive payout for 2024 is \$256,025. However, the Performance Incentive payout for 2024 has not been deducted from the fund balance nor is it reflected in the projected year-end fund balance.
- The Performance Incentive payout for 2025, designed at \$2.7 million, has not yet been deducted from the fund balance nor is it reflected in the projected year-end fund balance. This \$2.7 million future deduction was incorporated into the forecast which was used to calculate the Energy Efficiency charge for 2025.

Division 1-11, Page 2  
Budget, Savings, and Benefits

- 2025 Revenue is projected to be \$1.9 million higher than the amount used for the forecast of the 2025 Energy Efficiency charge.
  - 2025 interest earned is projected to be \$0.9M higher than the amount used for the forecast of the 2025 Energy Efficiency charge.
- b. The Company adjusted the budgets and savings for the Large C&I Retrofit, New Construction, and Small Business Direct Install programs based on historical participation rates including 2024 actual and 2025 year to date data. For example:
- 2024 Electric Large Commercial New Construction and Small Business Direct Install Programs actual spend was approximately 50% and 60% of the 2024 budgets, respectively.
  - A number of different cost categories were underspent, including:
    - Electric Commercial Retrofit Program and Small Business Direct Install Program Sales, Technical Assistance and Training (“STAT”) budgets, approximately 70% and 35%, respectively,
    - Electric New Construction Program and Small Business Direct Install Program incentive budgets were underspent, at approximately 30% and 59%.
  - Similarly, the gas Commercial Retrofit and Small Business Direct Install STAT budgets were approximately 56% and 47% of the 2024 STAT budgets.
  - The 2025 year-to-date actuals were also on track to be underspent relative to their 2025 budgeted amounts.

The scale of the Program savings and budgets are intended to reflect the results from the actual 2024 and actual 2025 year-to-date savings and budget spends while also incorporating changes in the savings and budgets for factors including, but not limited to, stricter code requirements in 2026 for new construction projects, reduced incentives for non-controlled lighting measures which are intended to support the elimination of incentives for non-controlled lighting measures in 2027, and to reduce overall program cost and the corresponding energy efficiency customer charge in 2026 as detailed on

Division 1-11, Page 3  
Budget, Savings, and Benefits

Bates page 318 Table E-1A, rows 12 and 13 and Bates page 335, Table G-1 (column c), rows 15 and 16.

Division 1-12  
Home Energy Reports and AMF/AMI

Request:

Please define the terms AMF and AMI and clarify their usage as both terms are used in the 2026 EE Plan.

Response:

Advanced metering functionality (“AMF”) refers to the functionality provided by advanced meters, also referred to as smart meters. AMF is a broader concept than Advanced Metering Infrastructure (“AMI”); AMI commonly refers only to the smart meters themselves. AMF refers to the functionality that comes from the broader deployment of hardware and software solutions needed to utilize smart meter data in a timely and efficient manner.<sup>1</sup>

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<sup>1</sup> RI PUC Docket No. 22-49-EL, [Advanced Metering Functionality Business Case and Attachments \(November 18, 2022\)](#), Bates page 1, footnote 2.

Division 1-13  
Home Energy Reports and AMF/AMI

Request:

Bates Page 42 states: “The Home Energy Reports program is a statewide energy efficiency offering that provides benefits for Rhode Island residential customers through emailing of customer specific energy usage reports and insights. The program has evolved since 2013 from offering mailed-only insights to now being digital-only, sending Non-Advanced Metering Infrastructure (“AMI”) High Usage Alerts, and utilizing segmentation to target different populations with relevant messaging. Rhode Island residential Electric and Gas customers with an email address on file are eligible for the HER program, which includes an electronic version of the report (“eHER”). All customers have access to the online home energy assessment and related insights.”

- a. How many customers will have AMI in 2026?
- b. Will High Usage Alerts be provided to customers who have AMI in 2026? If so, how will these alerts be delivered? If not, why not?
- c. Please provide the reduction in budget, annual and lifetime savings, and benefits associated with the digital-only targeting of Home Energy Reports.
- d. How many customers do not have an email address and therefore will no longer be receiving Home Energy Reports?

Response:

- a. Approximately 525,000 customers will have Advanced Meter Functionality (“AMF”) by the end of 2026.
- b. High usage alerts will be available to customers as soon as their advanced meter is installed through the AMF Customer Portal<sup>1</sup>. The customer will have to set usage thresholds and can choose to receive these alerts via email or text message.
- c. Please see the table below which provides the reduction in budget, annual and lifetime savings, and benefits associated with the digital-only targeting of Home Energy Reports.

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<sup>1</sup> [AMF Customer Portal Fact Sheet.](#)

Division 1-13, Page 2  
Home Energy Reports and AMF/AMI

	(a)	(b)	(c)	(d)	(e)
	<i>Home Energy Reports Reductions from 2025 to 2026</i>				
<b>Portfolio</b>	<b>Budget</b>	<b>Annual Savings</b>	<b>Lifetime Savings</b>	<b>Savings Units</b>	<b>Benefits</b>
1 Electric	\$1,674,491	4,015	4,015	MWh	\$533,887
2 Gas	\$152,679	27,778	27,778	MMBtu	\$637,403

- d. 97,563 customers do not currently have an email address on record with Rhode Island Energy and will no longer receive the Home Energy Reports.

Division 1-14  
Home Energy Reports and AMF/AMI

Request:

Bates Page 111 states: "Rhode Island Energy's 2026 Annual Plan will not include specific Advanced Meter Functionality (AMF) applications due to the ongoing, large-scale AMF meter deployment (nearly 525,000 new meters by 2026) requiring extensive planning, testing, and infrastructure development."

- a. What does it mean to 'not include specific AMF applications in the 2026 EE Plan'?
- b. Why would an EE Plan include costs, savings, and/or benefits attributable to AMF applications?
- c. Is energy efficiency a high priority use case for AMF? If not, why not? What other use cases are higher priority?

Response:

- a. To "not include specific AMF applications in the 2026 EE Plan" means that no part of the Plan relies upon AMF data for implementation. It also means that the 2026 Plan does not include any dedicated funding for AMF in support of energy efficiency.
- b. Utilizing ratepayer funded energy efficiency resources for programs that leverage AMF would necessitate that the intent, scale, costs, and benefits of that spending be outlined in the Plan. There is no overlap in costs, savings or benefits captured in the AMF filing, but if the Company finds opportunities for energy efficiency that rely on or may benefit from AMF, any additional implementation costs, savings and benefits would be captured in future energy efficiency plans.
- c. The use cases, outside of energy efficiency, for AMF are outlined in the AMF business case in Docket 22-49 EL and are being implemented as part of the AMF project. Energy efficiency is one of the potential use cases of AMF. Throughout the 2027-2029 energy efficiency planning process, Rhode Island Energy will evaluate the potential benefits and costs of utilizing AMF for energy efficiency.

Division 1-15  
Home Energy Reports and AMF/AMI

Request:

Bates Page 111 states: "The work in 2026 will focus on the implementation and evaluation of potential energy efficiency savings attributable to AMF and Sense. Implementation related questions focus on what Rhode Island Energy would need to do to claim program savings, for example, promoting the Sense mobile app to encourage customer adoption, coordinating with Sense for additional energy efficiency program promotions, and conducting evaluation activities".

- a. What are RIE's goals related to using AMF and Sense for energy efficiency?
- b. Can AMF and Sense identify equipment that is using more energy than normal and/or faltering equipment prior to failure, to allow for more time for customers to prepare for the replacement and more time for RIE work with the customer to adopt the best solution to meet their needs? Is this a use case that RIE is exploring?
- c. Has RIE collected any cost information on using AMF and Sense for energy efficiency? If so, what are the potential costs to the EE programs for AMF and Sense in a future year? What would the EE program get for those costs?

Response:

- a. Rhode Island Energy's goal is for customers to utilize Sense, paired with their AMF meter, to manage customer energy consumption in a demonstrably cost-effective manner.
- b. No, that functionality is not currently available. Sense is exploring the potential to use the AMF data for this purpose but does not yet offer a commercial product.
- c. Rhode Island Energy has not collected cost information for Sense related to energy efficiency. Sense does offer a product that would make load disaggregation data available directly to Rhode Island Energy to benefit the Company's Energy Efficiency programs. The benefits could include targeting high-usage customers, validated savings, and more precise marketing for customers. Rhode Island Energy has not yet performed an analysis to quantify the potential benefits of receiving customer load disaggregation data directly. If Sense were to provide load disaggregation data to Rhode Island Energy, the Company would ensure it has the necessary consent from the customer before receiving the data.

Division 1-16  
Home Energy Reports and AMF/AMI

Request:

Bates Page 157 and 158 state: "Moving forward, Rhode Island Energy will eliminate the Paper Home Energy Reports, which will significantly reduce program costs through the elimination of costs associated with printing and mailing the reports. Rhode Island Energy will continue with the Digital Home Energy Reports, which will reduce the program participants to households with an email on file. Rhode Island Energy will also continue with High Usage Alerts, which are already digital and alert customers when their usage is trending toward 30% or higher relative to the same billing cycle as the previous year. As AMF Portal and Sense are deployed, individuals will also have the tools to learn more about their home's instantaneous energy usage."

- a. At this time, does RIE think that the current Digital Home Energy Reports will remain in use past 2026? Why or why not?
- b. To what extent are the AMF Portal and Sense capable of providing information and data similar to the Digital Home Energy Reports?
- c. Is RIE considering replacing the Digital Home Energy Reports in a future year with tools such as the AMF Portal and Sense? Why or why not?
- d. Can the AMF Portal and Sense provide information and data that are different/additional to what is currently included in Digital Home Energy Reports? If so, what information and data can these tools provide?

Response:

- a. At this time, the Company believes there is value in Home Energy Reports that could extend beyond 2026. For the residential portfolio, Home Energy Reports provides cost effective energy savings to all participants. The program also provides education and energy savings tips to renters that have less control over updating the residence through upgrades such as weatherization and heating and water heating system replacements.
- b. Home Energy Reports' energy efficiency savings are based on the behavioral science of social norms and the belief that informing households of energy use in similar homes motivates energy-saving behavior. The program is designed with discrete treatment and control populations to allow for the attributed energy savings through independent

Division 1-16, Page 2  
Home Energy Reports and AMF/AMI

evaluation. Sense and AMF Portal do not provide the neighbor comparisons that drive behavioral change.

- c. If the AMF Portal and Sense develop tools that can be quantified for energy efficiency savings, then the Company would be open to evaluating the cost effectiveness of offerings.
- d. Yes, both these portals provide real time or near real-time access of customer usage.

The Sense application will show real-time usage and load disaggregation insights without any additional hardware beyond the meter once a customer consents and enrolls in the application. The mobile app allows residential customers to see in real-time how much energy their home and individual devices are consuming. The mobile app also provides personalized insights, energy savings tips, usage alerts, and energy tracking tools to help customers identify ways to save money and reduce their carbon footprint.

The Customer Portal, which will be accessed through a customer's online account, will also provide customers with near-real time data, allow customers to set usage alerts to notify customers when they have exceeded a particular threshold, and download their data in either Green Button or CSV format, which can also be shared with third-party vendors, so that customers can benefit from the different insights third-party vendors can provide.

Both these portals require the customer to go to the portal/application for initial set up and to view information whereas Home Energy Reports are sent directly to customers.

Division 1-17  
Home Energy Reports and AMF/AMI

Request:

Are any AMF Portal and Sense research and development efforts occurring in 2026? If so, are any of these efforts related to energy efficiency? If so, what portion of the electric and gas budgets are related to AMF Portal/Sense research and development efforts for energy efficiency? Please provide the budget and identify the program(s) where this budget resides.

Response:

No, the Company is not conducting any AMF Portal or Sense research and development efforts in 2026. The Company is deploying the Sense application in early 2026, with functional design and testing ongoing through the end of 2026. There is no dedicated budget for AMF or Sense research in the 2026 energy efficiency budget.

Division 1-18  
Home Energy Reports and AMF/AMI

Request:

Is RIE planning on conducting an EE potential study to inform its 2027-2029 EE Plan? If so, how much of the 2026 EE Plan budget is allocated to this effort? Is RIE considering accounting for the impacts of the application of the AMF Portal and Sense in the next EE potential study?

Response:

No, the Company is not planning on conducting an EE potential study to inform its 2027-2029 EE Plan. The Energy Efficiency and Resource Management Council ("EERMC") has commissioned EE potential studies in the past. The EERMC is currently discussing what it will do for the 2027-2029 EE plan.

Division 1-19  
GHG Accounting

Request:

Bates Page 60 provides a list of six methodological changes made in 2026 including: “1. Adjustment to the calculation of non-embedded GHG benefits and 2. Adjustment to the estimation of avoided GHG short tons in Rhode Island”. Additionally, Bates Page 61 states, “As described in the 2026 Annual Plan, Attachment 4, Section 3.10 and in Mr. Zhu’s testimony, the avoided costs of RPS compliance are now being netted out from non-embedded GHG benefits. At the same time, estimated avoided GHG short tons in Rhode Island associated with electric measures go to zero in 2033 when the Rhode Island RPS requirement reaches 100 percent.”

- a. Please provide the reduction to the electric plan avoided GHG short tons and non-embedded GHG benefits due to the application of an RPS scaling factor which results in electric measures going to zero in 2033 when the Rhode Island RPS requirement reaches 100 percent.
- b. Please provide the reduction to the gas plan avoided GHG short tons and non-embedded GHG benefits due to the application of an RPS scaling factor which results in electric measures going to zero in 2033 when the Rhode Island RPS requirement reaches 100 percent.
- c. Please provide the further reduction to the electric plan non-embedded GHG benefits due to the netting out of avoided costs of RPS compliance from non-embedded GHG benefits.
- d. Please provide the further reduction to the gas plan non-embedded GHG benefits due to the netting out of avoided costs of RPS compliance from non-embedded GHG benefits.

Response:

- a. The reduction to the electric plan avoided GHG short tons in Rhode Island is 10,915 annual short tons and 124,314 lifetime short tons due to the application of the RPS scaling factor. There is no reduction to non-embedded GHG benefits due to the application of the RPS scaling factor. The RPS scaling factor is used only to scale the short ton reductions in Rhode Island.
- b. The reduction to the gas plan avoided GHG short tons in Rhode Island is 83 annual short tons and 2,816 lifetime short tons due to the application of the RPS scaling factor. There is no reduction to non-embedded GHG benefits due to the application of the RPS scaling

Division 1-19, Page 2  
GHG Accounting

factor. The Rhode Island RPS scaling factor is used only to scale the short ton reductions in Rhode Island.

- c. The reduction to the electric plan non-embedded GHG benefits due to the netting out of avoided costs of RPS compliance from non-embedded GHG benefits is \$10.8 million.
- d. The reduction to the gas plan non-embedded GHG benefits due to the netting out of avoided costs of RPS compliance from non-embedded GHG benefits is \$234 thousand.

Division 1-20  
GHG Accounting

Request:

Bates Page 303 states, “In 2033 when the Rhode Island RPS requirement goes to 100%, the monetary value of avoided non- embedded GHGs associated with electric energy efficiency is non-zero, but the number of GHG short ton reductions in Rhode Island associated with energy efficiency is zero. Energy efficiency in Rhode Island avoids electricity generation which in turn avoids emissions from generation facilities in the New England region which are not governed by Rhode Island’s RPS requirement. Therefore, Rhode Island energy efficiency still has non-embedded GHG benefits even when the Rhode Island RPS requirement is 100% and energy efficiency is not reducing GHG short tons in Rhode Island. Additionally, to fulfill the Act on Climate, Rhode Island’s statewide economy must undertake many initiatives in addition to energy efficiency such as gas sector decarbonization and transportation electrification. Even after 2033, when the Rhode Island RPS is 100%, energy efficiency still provides value in contributing to Rhode Island’s economy-wide efforts to meet the Act on Climate emissions reductions goals (80% of 1990 levels by 2040, etc.). Rhode Island Energy acknowledges that the electric sector MAC methodology does not completely capture the various ways energy efficiency in Rhode Island provides non-embedded GHG benefits before and after 2033. However, Rhode Island Energy considers the electric sector MAC a reasonable proxy for these benefits that likely produces a conservative estimate.”

- a. If you assume after 2033, when the Rhode Island RPS is 100%, energy efficiency still provides value in contributing to Rhode Island’s economy-wide efforts to meet the Act on Climate emissions reductions goals, and you therefore do not scale down the GHG value by 1 minus the RPS target after 2033 (i.e., you do not set it to zero), then it follows that you should not scale down GHG value by 1 minus the RPS target prior to 2033. Do you agree with this statement?
- b. Is this statement consistent with the method that you used to estimate the value of GHG emissions in the 2026 EE plan?

Response:

- a. In responding to this question, the Company interprets “GHG value” as the dollar value of GHG reduction benefits, not tons of GHG. Yes, the Company agrees with this statement. It is consistent to not scale down GHG benefits prior to 2033 if they are not being scaled down after 2033.

Division 1-20, Page 2  
GHG Accounting

- b. The statement is not consistent with the method that was used to estimate the value (dollar value of benefits) of GHG emissions in the 2026 Annual Plan. The GHG benefits are calculated only by netting out RPS compliance costs from the full avoided costs value of non-embedded GHGs provided in the AESC 2024 User Interface.

Only calculated GHG short tons reductions are scaled by one minus the RPS target prior to, during, and after 2033. The GHG benefits are not adjusted by one minus the RPS target.

Division 1-21  
GHG Accounting

Request:

Please refer to the 25-37-EE - 2026\_BCR\_Model.xlsx. Please also refer to Bates Page 302 which states, "For reporting of Rhode Island GHG reductions in short tons associated with electric measures (presented in Attachments 5, Table E-6A), annual pounds-per-MWh emissions factors sourced from the AESC 2024 User Interface Counterfactual #3 workbook are scaled by one minus the annual RPS targets detailed in AESC 2024, Tables 79 and 80. Therefore, in 2033 when the Rhode Island RPS target reaches 100%, the avoided short tons of GHGs in Rhode Island associated with electric measures reaches 0." Please also refer to Bates Page 303 which states: "The non-embedded GHG reduction benefit is calculated by multiplying the kWh and/or MMBtu fuel savings by the respective non-embedded cost of carbon specific to that fuel type and temporal category, if applicable (e.g., summer peak).

- Summer Peak Non-Embedded GHG Benefit (\$) = Net Annual kWh \* Summer Peak Energy % \* Summer Peak Non-Embedded GHG Value \$/kWh@Life \* (1 + Energy Losses) Already included in User Interface"
  - a. Please explain how the RPS-scaled annual pounds-per-MWh emissions factors are accounted for in the summer peak non-embedded GHG benefit calculation shown above (as pounds-per-MWh emissions factors are not an explicit component of this equation). Which component of the equation is being adjusted to account for RPS scaling? How is this component adjusted for each year that benefits accrue (since the RPS scaling factor is different for each year that benefits accrue)?
  - b. Please identify the tabs and cells on those tabs in the BCR model where the RPS-scaled annual pounds-per-MWh are applied to the calculation of non-embedded GHG benefits.
  - c. Please provide a separate workbook illustrating how the RPS scaling is applied to the calculation of non-embedded GHG benefit for a single measure.

Response:

- a. Rhode Island RPS-scaling is not part of the summer peak non-embedded GHG benefit calculation shown above. The "Summer Peak Non-Embedded GHG Value \$/kWh@Life" has RPS compliance costs netted out at the AESC 2024 User Interface level. No component of the equation is being adjusted to account specifically for one

Division 1-21, Page 2  
GHG Accounting

- minus the Rhode Island RPS requirement. When RPS compliance costs are netted out from the full value of non-embedded GHG avoided costs at the AESC 2024 User Interface level, this is done for all annual RPS and non-embedded GHG avoided costs within the larger stream of RPS and non-embedded GHG avoided costs. Because annual RPS compliance costs are subtracted, RPS scaling factors do not enter into the calculation.
- b. Rhode Island RPS-scaling is not applied to the calculation of non-embedded GHG benefits.
  - c. Please see section (b) above.

Division 1-22  
Weatherization Accounting

Request:

Bates Page 66 states: “In general, assuming a more efficient source of heat reduces the savings and benefits from weatherization and, consequently, reduces cost-effectiveness. However, post conversion, the savings are electric savings rather than, in many cases, delivered fuel savings. This increases electric system benefits in the Comparison of the Cost of Efficiency to the Cost of Supply and in the calculation of PIM-eligible net benefits.”

- a. Please provide the change to the electric plan annual and lifetime savings and benefits due to this change by program and in total. Please break out the change in electric savings and benefits from the change in delivered fuels savings and benefits.
- b. Please provide the change to the gas plan annual and lifetime savings and benefits due to this change by program and in total. Please break out the change in electric savings and benefits from the change in gas savings and benefits.

Response:

- a. Please see Table 1 below for the changes to the electric plan annual and lifetime savings and benefits due to said change. Rows 1, 2, and 7 in Column (b) show a decrease despite post conversion electric savings because Rhode Island Energy also adopted a new Income Eligible Single Family Impact Evaluation. The adoption of this new evaluation directly affects the per unit kWh savings value and cannot be isolated from the effect of comparatively increased post conversion electric savings.

	(a)	(b)	(c)
↓ Change To:	EnergyWise Single Family	Income Eligible Single Family	Total
1 Annual MWh	345	-35	310
2 Lifetime MWh	6,907	-702	6,205
3 Annual Oil MMBtu	-5,160	-1,770	-6,930
4 Lifetime Oil MMBtu	-103,194	-35,405	-138,599
5 Annual Propane MMBtu	-688	-85	-773
6 Lifetime Propane MMBtu	-13,759	-1,704	-15,463
7 Electric Benefits	\$682,306	-\$139,419	\$542,887
8 Oil Benefits	-\$2,543,556	-\$851,091	-\$3,394,646
9 Propane Benefits	-\$766,552	-\$91,890	-\$858,441
10 Total Benefits	-\$2,627,801	-\$1,082,400	-\$3,710,201

Division 1-22, Page 2  
Weatherization Accounting

- b. Please see Table 2 below for the changes to the gas plan annual and lifetime savings and benefits due to said change.

**Table 2**

	(a)	(b)	(c)
↓ Change To:	<b>EnergyWise Single Family</b>	<b>Income Eligible Single Family</b>	<b>Total</b>
1 Annual MWh	-4,675	-1,579	-6,255
2 Lifetime Gas MMBtu	-93,503	-31,589	-125,092
3 Annual MWh	186	12	198
4 Lifetime MWh	3,720	232	3,952
5 Gas Benefits	-\$997,632	-\$360,437	-\$1,358,069
6 Electric Benefits	\$394,794	\$24,580	\$419,374
7 Total Benefits	-\$599,118	-\$335,626	-\$934,743

Division 1-23  
Weatherization Accounting

Request:

Bates Page 133 states: "If a customer electrifies in the future, the benefits of that upgrade would likely become electric system benefits within the life of the measure and research has shown that residential customers who heat with delivered fuels are more likely to electrify their heat than the average customer. This same rationale applies to measures such as hot water saving measures or heating system thermostats in buildings that currently use delivered fuels for heating. Rhode Island Energy has a long track record of delivering these programs successfully." Please confirm if RIE made any adjustments to the savings accounting for hot water saving measures or heating system thermostats.

Response:

Rhode Island Energy did not make any adjustments to the savings calculations for hot water measures or heating system thermostats to reflect anticipated electrification over the lifetime of those measures.

Division 1-24  
Weatherization Accounting

Request:

Referencing page 187 of the Plan (row 67), the Company proposes a measure called “Weatherization, Delayed HP conversion of oil.” Please provide further explanation of this measure, including how this measure differs from the measure “Weatherization, Oil (see Page 189, row 70).”

- a. Is the Company claiming additional savings for the “Delayed HP conversion” measure? Include in your answer how the Company calculated the differences between the two referenced measures in terms of net annual savings, net lifetime savings, net annual GHG reductions, and net lifetime GHG reductions associated with this measure.
- b. Does the Company claim savings, including savings associated with the delayed HP conversion, at the time of the weatherization? Or does the Company claim the additional savings at the time of the HP conversion?
- c. Please explain how the Company ensures that the customer completes a HP conversion.
- d. Please explain what is required for a HP conversion, i.e., does the customer have to remove the oil heating system.

Response:

- a. No, the Company is not claiming additional savings for the “Weatherization, Delayed HP conversion” measures. There are two measures for weatherization that were added to the Income-eligible Single Family (“IESF”) and EnergyWise Single Family (“EWSF”) programs. Please see below for the list of measures. Please see the Company’s response to PUC 2-25 for the differences in calculation.

	(a)	(b)	(c)	(d)	(e)
	Program	Existing Heating System	New Heating System	Existing Weatherization Measure	Delayed HP Conversion Weatherization Measure
1	IESF	Electric Resistance	Heat Pump	Weatherization, Electric Resistance	Weatherization, Delayed HP conversion of electric resistance
2	IESF	Gas Boiler/Furnace	Heat Pump	Weatherization, Gas	Weatherization, Delayed HP conversion of gas
3	IESF	Oil Boiler/Furnace	Heat Pump	Weatherization, Oil	Weatherization, Delayed HP conversion of oil

Division 1-24, Page 2  
Weatherization Accounting

4	IESF	Propane Boiler/Furnace	Heat Pump	Weatherization, Other	Weatherization, Delayed HP conversion of propane
5	EWSF	Electric Resistance	Heat Pump	Weatherization, Electric Resistance	Weatherization, Delayed HP conversion of electric resistance
6	EWSF	Gas Boiler/Furnace	Heat Pump	Weatherization, Gas	Weatherization, Delayed HP conversion of gas
7	EWSF	Oil Boiler/Furnace	Heat Pump	Weatherization, Oil	Weatherization, Delayed HP conversion of oil
8	EWSF	Propane Boiler/Furnace	Heat Pump	Weatherization, Others	Weatherization, Delayed HP conversion of propane

- b. Rhode Island Energy is claiming all of the weatherization savings at the time of weatherization in 2026. Rhode Island Energy is not claiming any heating system savings associated with heat pump conversion in 2026, unless the customer converts from electric resistance heat to a heat pump in 2026. However, those heat pump conversion savings are claimed under the electric resistance heat to heat pump measure, and not the weatherization measure.
- c. Rhode Island Energy expects a percentage of customers who weatherize in 2026 to install a heat pump over the 20 year lifetime of the measure. Please refer to the Company’s responses to PUC 2-38 and PUC 2-40 for more detail on how the Company may verify whether a customer completes a heat pump conversion or not.
- d. No specific heating system is required for a heat pump conversion. Instead, a heat pump conversion is when a customer with an existing heating system other than a heat pump installs a heat pump.

Division 1-25  
Weatherization Accounting

Request:

Please list all measures where the savings the Company claims is based on whether the customer takes some future action, i.e., weatherization where customer installs heat pumps at a later date. Please provide a table listing each measure, the quantity planned, incentive per measure, net annual savings, net lifetime savings, net annual GHG reductions, and net lifetime GHG reductions. To the extent the Company proposes any comparable measure that is not contingent on the customer taking some future action, please provide the same information as above.

Response:

Please see below for a list of all measures where claimed savings assume some future action by the customer. Please see Attachment Division 1-25 for the requested table including comparable measures not contingent on the customer taking some future action.

	(a)	(b)	(c)
	<b>Portfolio</b>	<b>Program</b>	<b>Measure</b>
1	Electric	EnergyWise Single Family	Weatherization, Delayed HP conversion of electric resistance
2	Electric	EnergyWise Single Family	Weatherization, Delayed HP conversion of oil
3	Electric	EnergyWise Single Family	Weatherization, Delayed HP conversion of propane
4	Gas	EnergyWise Single Family	Weatherization, Delayed HP conversion of gas
5	Electric	Income Eligible Single Family	Weatherization, Delayed HP conversion of electric resistance
6	Electric	Income Eligible Single Family	Weatherization, Delayed HP conversion of oil
7	Electric	Income Eligible Single Family	Weatherization, Delayed HP conversion of propane
8	Gas	Income Eligible Single Family	Weatherization, Delayed HP conversion of gas

Measures where the customer is assumed to take some future action

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)
Identifiers			Quantity		Costs		Electric Savings				Gas Savings (MMBtu)		Delivered Fuels Savings (MMBtu)				GHG (Short Tons)	
Portfolio	Program	Measure	Quantity Units	Quantity	Incentive per Quantity	Total Incentive	Net Annual MWh	Net Lifetime MWh	Net Annual Winter kW	Net Annual Summer kW	Net Annual Gas Savings	Net Lifetime Gas Savings	Net Annual Oil Savings	Net Lifetime Oil Savings	Net Annual Propane Savings	Net Lifetime Propane Savings	Net Annual GHG Reductions	Net Lifetime GHG Reductions
1	Electric	EnergyWise Single Family	Weatherization, Delayed HP conversion of electric resistance	per unit of measure	220	\$4,000.00	\$880,000	153.3	3,065.1	32.0	139.3	0.0	0.0	0.0	0.0	0.0	0.0	145.1
2	Electric	EnergyWise Single Family	Weatherization, Delayed HP conversion of oil	per unit of measure	900	\$2,650.00	\$2,385,000	273.1	5,462.7	15.6	68.1	0.0	0.0	4,995.9	99,918.0	0.0	0.0	6,825.6
3	Electric	EnergyWise Single Family	Weatherization, Delayed HP conversion of propane	per unit of measure	120	\$2,300.00	\$276,000	36.4	728.4	2.1	9.1	0.0	0.0	0.0	0.0	666.1	13,322.4	944.1
4	Gas	EnergyWise Single Family	Weatherization, Delayed HP conversion of gas	per unit of measure	750	\$3,375.00	\$2,531,250	233.8	4,675.1	5.3	8.6	4,470.4	89,407.5	0.0	0.0	0.0	0.0	5,457.0
5	Electric	Income Eligible Single Family	Weatherization, Delayed HP conversion of electric resistance	per unit of measure	42	\$5,500.00	\$231,000	15.6	311.2	16.4	44.7	0.0	0.0	0.0	0.0	0.0	0.0	14.7
6	Electric	Income Eligible Single Family	Weatherization, Delayed HP conversion of oil	per unit of measure	173	\$5,500.00	\$951,500	43.9	878.8	67.4	184.1	0.0	0.0	735.3	14,705.0	0.0	0.0	1,008.1
7	Electric	Income Eligible Single Family	Weatherization, Delayed HP conversion of propane	per unit of measure	8	\$5,500.00	\$44,000	1.6	32.0	3.1	8.5	0.0	0.0	0.0	0.0	23.2	464.0	33.2
8	Gas	Income Eligible Single Family	Weatherization, Delayed HP conversion of gas	per unit of measure	93	\$6,100.00	\$567,300	22.7	454.8	1.4	2.3	432.5	8,649.0	0.0	0.0	0.0	0.0	528.0

Comparable measures to those where the customer is assumed to take some future action

Note: Row 1 is comparable to Row 9, Row 2 is comparable to Row 10, etc.

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)
Identifiers			Quantity		Costs		Electric Savings				Gas Savings (MMBtu)		Delivered Fuels Savings (MMBtu)				GHG (Short Tons)	
Portfolio	Program	Measure	Quantity Units	Quantity	Incentive per Quantity	Total Incentive	Net Annual MWh	Net Lifetime MWh	Net Annual Winter kW	Net Annual Summer kW	Net Annual Gas Savings	Net Lifetime Gas Savings	Net Annual Oil Savings	Net Lifetime Oil Savings	Net Annual Propane Savings	Net Lifetime Propane Savings	Net Annual GHG Reductions	Net Lifetime GHG Reductions
9	Electric	EnergyWise Single Family	Weatherization, Electric Resistance	per unit of measure	220	\$4,000.00	\$880,000	248.3	4,965.4	32.0	139.3	0.0	0.0	0.0	0.0	0.0	0.0	235.0
10	Electric	EnergyWise Single Family	Weatherization, Oil	per unit of measure	300	\$2,650.00	\$795,000	17.5	349.4	5.2	22.7	0.0	0.0	3,385.2	67,704.0	0.0	0.0	4,466.3
11	Electric	EnergyWise Single Family	Weatherization, Others	per unit of measure	40	\$2,300.00	\$92,000	2.3	46.6	0.7	3.0	0.0	0.0	0.0	0.0	451.4	9,027.2	618.6
12	Gas	EnergyWise Single Family	Weatherization	per unit of measure	2,250	\$3,375.00	\$7,593,750	143.3	2,866.5	15.9	25.7	27,436.5	548,730.0	0.0	0.0	0.0	0.0	32,269.5
13	Electric	Income Eligible Single Family	Weatherization, Electric Resistance	per unit of measure	42	\$5,500.00	\$231,000	25.0	500.6	16.4	44.7	0.0	0.0	0.0	0.0	0.0	0.0	23.7
14	Electric	Income Eligible Single Family	Weatherization, Oil	per unit of measure	57	\$5,500.00	\$313,500	4.8	95.8	22.2	60.6	0.0	0.0	484.5	9,690.0	0.0	0.0	641.4
15	Electric	Income Eligible Single Family	Weatherization, Other	per unit of measure	2	\$5,500.00	\$11,000	0.2	3.4	0.8	2.1	0.0	0.0	0.0	0.0	11.6	232.0	16.0
16	Gas	Income Eligible Single Family	Weatherization	per unit of measure	277	\$6,100.00	\$1,689,700	23.3	465.4	4.2	6.7	2,576.1	51,522.0	0.0	0.0	0.0	0.0	3,039.2

Division 1-26  
Coordination between RIE and OER/CHRI

Request:

Did OER provide RIE with an estimate of heat pump customers to be referred to RIE for weatherization in 2026? If so, please provide this estimate. If not, why not?

Response:

No, OER did not provide Rhode Island Energy with an estimate of heat pump customers to be referred to Rhode Island Energy for weatherization in 2026. Under current Clean Heat Rhode Island ("CHRI") requirements, a participant must live in a home that has received weatherization services prior to the installation of a heat pump. As part of the CHRI process, Rhode Island Energy confirms for OER that an applicant has been weatherized. If they have been weatherized, they proceed to the next step of the CHRI process. If they have not, they are enrolled in the appropriate Rhode Island Energy efficiency programs and scheduled for a home energy assessment. Given the uncertainty around each CHRI applicant's weatherization status, OER explained that it was not possible to estimate the number of applicants that would require weatherization.

Division 1-27  
Coordination between RIE and OER/CHRI

Request:

Did RIE provide OER with an estimate of weatherization customers in 2026 who may be eligible for and interested in heat pumps through OER's CHRI program? If so, please provide this estimate. If not, why not?

Response:

No, Rhode Island Energy did not provide OER with an estimate of weatherization customers in 2026 who may be eligible for and interested in heat pumps through OER's Clean Heat Rhode Island ("CHRI") program. The Company is not aware of an OER request for an estimate. Rhode Island Energy refers any weatherization participants that are eligible to the CHRI program. In the past, demand for CHRI has exceeded available funding and these referrals may not be material to OER's planning process.

Division 1-28  
CHP

Request:

Bates Pages 10 and 11 states: “Combined Heat and Power (“CHP”) incentives will be reduced, and eligibility will be limited to projects achieving at least 45 percent carbon reduction.”

- a. Please describe the reductions in incentives in more detail. Are the reductions in incentives due to or distinct from the eligibility limitations?
- b. Is there any administrative budget to support CHP project development in the proposed 2026 EE Plan? If so, what categories of costs are included and what is the budget within each cost category?
- c. If there is no administrative budget attributable to CHP in the proposed 2026 EE Plan, how will RIE continue to support CHP project development in 2026?

Response:

- a. The 2026 incentives are included in Table 3 on Bates Page 220 and provided below along with the 2025 and 2024 incentives. As shown in the table below, the reductions in incentives for 2026 are consistent with reductions in incentives in years past. These reductions are distinct from the eligibility limitations.

	(a)	(b)	(c)	(d)
	<b>2026 Incentive*</b>	<b>2025 Incentive*</b>	<b>2024 Incentive *</b>	
(1) Fuel Cell	\$300	\$500	\$700	
(2) Combustion-Based CHP with total system efficiency $\geq 60\%$	\$400	\$600	\$800	
(3) CHP (fuel cell or combustion-based) that utilizes more than 25% opportunity fuels, renewable natural gas, or biogas as the fuel source	\$550	\$750	\$1,050	

\* All incentives are “per net kW”

Division 1-28, Page 2  
CHP

- b. There is no specific budget for CHP project support in the 2026 Annual Plan. Administration costs to support CHP project development are included in the Sales, Technical Assistance and Training (“STAT”) \$4.1 million budget, as provided on Bates page 321 of the 2026 Annual Plan. Administration costs charged to support CHP development would be primarily for services to develop the Technical Assistance Study, screen the project using the Benefit-Cost screening tool, and develop additional technical documents like the Minimum Requirements Document. Additional administration costs charged to the STAT budget would be for Rhode Island Implementation team’s time to review these documents.

The administration costs described above to support the development of CHP projects are similar to costs incurred for other non-CHP, complex projects requiring Technical Assistance Studies, project cost-effectiveness screenings or post-installation verification documentation. The Company may not be aware of these projects during the planning process and therefore does not budget for specific projects in the STAT budget. Rather, the Company manages the total STAT budget to ensure the Company can support the development of CHP and non-CHP complex projects. This occurred in 2025 when the Company’s technical assistance vendor was developing the technical documents for the RI GROWS CHP project.

- c. Please reference the Company’s response to section (b) above.

Division 1-29  
Pre-Weatherization Barriers

Request:

Bates Page 160 states: “The program also provides a \$250 incentive to customers who certify that pre-weatherization barriers have been remediated by appropriate licensed professionals, or it can also be used for lower cost barriers such as cleaning and tuning of the heating system.”

- a. Please provide the total number of audits in 2024 (actuals), 2025 (assumed in the plan), 2025 (estimate through end of year), and 2026 (proposed in the plan).
- b. Please provide the number of audits with pre-weatherization barriers in 2024 (actuals), 2025 (assumed in the plan), 2025 (estimated through end of year), and 2026 (assumed in the plan).
- c. Please provide the quantity and total cost of remediation incentives in 2024 (actuals), 2025 (assumed in the plan), 2025 (estimated through end of year), and 2026 (assumed in the plan).

Response:

- a. Please see Table 1 for the total number of audits. The Company does not produce estimates through end of year for this metric and instead provided the number of audits conducted through the third quarter of 2025 (“Q3 2025”).

**Table 1**

	(a)	(b)
		<b>Total Audits</b>
(1)	2024 (actuals)	13,975
(2)	2025 (assumed in plan)	10,975
(3)	2025 (through Q3 2025)	7,427
(4)	2026 (proposed in plan)	11,055

- b. Please see Table 2 for the number of audits with pre-weatherization barriers (“PWBs”). The Company does not produce estimates through end of year for this metric and instead

Division 1-29, Page 2  
Pre-Weatherization Barriers

provided the number of audits with PWBs through Q3 2025. The Company does not assume number of audits with PWBs during the planning process.

**Table 2**

(a)	(b)
	<b>Audits with PWBs</b>
(1) 2024 (actuals)	4,334
(2) 2025 (assumed in plan)	N/A
(3) 2025 (through Q3 2025)	2,849
(4) 2026 (proposed in plan)	N/A

- c. Please see Table 3 for quantity and total cost of remediation incentives. The Company does not produce estimates through end of year for this metric and instead provided the quantity and total cost of remediation incentives through Q3 2025.

**Table 3**

	(a)	(b)	(c)
		<b>Remediation Incentive Quantity</b>	<b>Total Cost</b>
(1) 2024 (actuals)		424	\$ 106,678
(2) 2025 (assumed in plan)		715	\$ 178,750
(3) 2025 (through Q3 2025)		418	\$ 101,934
(4) 2026 (proposed in plan)		800	\$ 200,000

Division 1-30  
Pre-Weatherization Barriers

Request:

Bates Page 162 states: “In 2025, Rhode Island Energy added two additional items to be covered by the \$250 PWB incentive. These are (1) attic floor removal and (2) gas range venting. Rhode Island Energy estimates approximately 45 additional weatherization jobs to be gained through this addition, or a 2% increase relative to 2024 actuals. In addition, Rhode Island Energy is continually seeking to provide a more turnkey and seamless experience for the customer to overcome barriers. As such, in 2026 Rhode Island Energy, through its EW SF lead vendor RISE, will offer a relatively turnkey, integrated solution for knob and tube (K&T), vermiculite, and mold remediation/abatement. For mold and vermiculite, the auditor will capture photos and square footage during the site assessment. With the customer’s approval, these can be provided to pre-approved sub-contractors for two to three remediation estimates. The best estimate will be provided back to the customer, integrated into the scope of work, which can then be financed through the HEAT Loan. In the case of knob and tube, RISE will, with the permission of the customer, coordinate for an electrician to come to the site to assess and provide the remediation bid. Similarly, this quote would then be available for incorporation into a HEAT Loan application. These enhancements should greatly reduce the work needed from customers to overcome barriers.” Please provide the effect of these changes on the quantities and total cost of remediation incentives assumed in the 2026 proposed plan.

Response:

In the proposed 2026 Annual Plan, the Company increased the quantity of remediation incentives by 85 (11.8 percent) compared to the 2025 plan. The incentive offered per remediation will remain at \$250, which is the same level as approved in the 2025 plan. As a result, the total cost of remediation incentives increased by \$21,250 in the proposed 2026 Annual Plan. Please see Table 1 below for the breakdown of planned quantities and the total planned cost of remediation incentives in 2025 and 2026.

**Table 1**

	(a)	(b)	(c)	(d)
(1)		<b>Planned 2025</b>	<b>Planned 2026</b>	<b>Change</b>
(2)	Quantity	715	800	85
(3)	Incentive Cost	\$178,750	\$200,000	\$21,250
(4)	Incentive per Remediation	\$250	\$250	\$0

Division 1-31  
Performance Incentive Mechanism

Request:

Bates Page 30 states, "Consistent with the approved PIM structure in Docket No. 5076, the Company is seeking electric performance incentives of \$2,847,020 (through non-income eligible and C&I sectors) and natural gas performance incentives of \$33,908 (all through the C&I sector)." The table on Bates Page 31 shows an increase in the electric PIM from \$2,714,357 in 2025 to \$2,847,020 in 2026 or \$132,663. The table on Bates Page 31 shows a decrease in the gas PIM from \$634,606 in 2025 to \$33,908 in 2026 or -\$600,698.

- a. Please explain the causes of the increase in the electric PIM. Please indicate which causes have the most significant impact.
- b. Please explain the causes of the decrease in the gas PIM. Please indicate which causes have the most significant impact.

Response:

- a. The increase in the electric PIM is caused primarily by Rhode Island Energy's increased focus on optimizing the measure mix to deliver utility system benefits. These optimization procedures were used primarily to ensure that electric portfolio intrastate cost of supply without delivered fuels is greater than the cost of energy efficiency, including participant costs. As a result, PIM-eligible net benefits increased.
- b. The decrease in the gas PIM is primarily caused by decreases in the C&I gas budget from 2025 (C&I is the only sector with a non-default performance incentive). Additionally, as detailed in the Company's response to PUC 1-5, increases to certain gas C&I measure level incentives resulted in decreased PIM-eligible net benefits.

Division 1-32  
Gas Investments

Request:

Bates Page 112 states: “The PUC Docket 22-01-NG Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island is ongoing. It is expected the PUC will provide guidance sometime in 2025 regarding decarbonization strategies that are actionable in the near-term; affordable and practical for Rhode Island’s households, businesses, and essential institutions; account for customer choice considerations; ensure reliable, safe, and cost-effective energy delivery; and support economic development and growth in Rhode Island. Rhode Island Energy will incorporate, as appropriate, any outcomes from this docket that impact program design and delivery in a timely manner, and to the extent possible.”

- a. Would RIE consider reducing gas investment in the 2026 EE Plan if the guidance suggested or directed it?
- b. If guidance supporting a lower investment in gas energy efficiency came out in late 2025 from the PUC, when could RIE file a 2026 EE Plan adjustment?
- c. What process would RIE use to propose and seek approval for a reduction in the gas energy efficiency investments in the approved 2026 EE Plan?

Response:

- a. Yes, the Company would consider reducing gas investment in the 2026 Annual Plan if the guidance suggested or directed it.
- b. If guidance supporting a lower investment in gas energy efficiency was issued in late 2025, the Company expects that the Commission would account for that guidance in its decision and its evaluation of the 2026 Annual Plan which will occur near the end of 2025. If a directive resulting from Commission guidance was issued after the Commission’s approval of a 2026 Annual Plan that required adjustments to the Plan, the Company would require an opportunity to review and evaluate the substance of any Commission guidance and would comply with the any directives issued regarding timing of such adjustment.
- c. The process the Company would use to propose or seek approval of changes would depend on unknown variables and considerations, including the substance of any Commission guidance, when the Commission guidance is issued, and the extent to which any guidance aligns or conflicts with the approved 2026 Annual Plan.

Division 1-32, Page 2  
Gas Investments

For instance, if the Commission directs the Company to make certain changes to the 2026 Annual Plan, the Company will comply and may not need to seek separate approval of those changes, and this would depend on the language of the guidance itself. If changes to the 2026 Annual Plan are warranted and require Commission approval, the Company will use an appropriate procedural avenue that is consistent with Rhode Island law, the Public Utilities Commission Rules of Practice and Procedure and the Energy Efficiency Tariff, RIPUC Tariff No. 2197.

Division 1-33  
Gas Investments

Request:

Please refer to Table 6. Comparison of Goals with EERMC Proposed Targets on Bates Page 137 which shows Income Eligible Residential planned values for gas programs that are higher than EERMC proposed targets and planned values for electric programs that are half of the EERMC proposed targets.

- a. Why are Income Eligible Residential gas planned values the only values in this table that are higher than the EERMC targets?
- b. Why are Income Eligible Residential electric planned values so much lower than the EERMC targets if the gas planned values are higher?

Response:

- a. The Company weighed actual program performance from prior years when setting its goals in the 2026 Annual Plan. The Company endeavors to set ambitious goals based on what is cost effective for its customers and realistically achievable given market conditions. In the Company's Corrected 2024 Energy Efficiency Year-End Report in Docket No. 23-35-EE, Table E-1 (Bates Page 45) and Table G-1 (Bates Page 55) show that the Income Eligible Residential Gas sector is the only sector where actual performance is relatively close to the EERMC Proposed Targets. In this filing, the Income Eligible Residential Gas sector achieved 86 percent of the EERMC Proposed Target on Bates Page 147 of the 2026 Annual Plan while all other sectors achieved less than 50 percent of their respective EERMC Proposed Targets. Given this performance, the Company has set a higher goal for the Income Eligible Residential gas sector in the 2026 Annual Plan.
- b. Please reference section (a) above.

Division 1-34  
Gas Investments

Request:

Please refer to Table E-10: Rhode Island Energy Historical Data on Bates Page 334 which shows the average cost of the electric plan for a Residential customer of \$35 to \$37 dollars in 2026, the lowest annual cost since 2016 and a significant decrease from the high of \$79 to \$83 in 2020. Please also refer to Table G-10: Rhode Island Energy Historical Data and on Bates Page 349 which shows the average cost of the gas plan for a Residential customer of \$112 to \$115 per year, the highest annual cost since 2016 and a near doubling of the 2016 cost.

- a. Please explain why RIE reduced Residential electric plan budgets significantly while increasing Residential gas plan budgets.
- b. Please explain how RIE considers the proposed gas plan to be affordable for Residential customers.

Response:

- a. In the 2026 Annual Plan, the Company sought to alleviate bill pressures through budget reductions in both the electric and gas portfolios. In the Residential gas sector, the overall budget increase was driven by an increase in the EnergyWise Single Family gas budget. This program had a strong year in 2024 and has proven to be popular with customers. Rhode Island Energy increased budgets for measures across the program, such as weatherization upgrades, which increase comfort while saving money on energy. This budget increase allows Rhode Island Energy to continue serving all customers who want to participate in this program. While this program budget did increase in the 2026 Annual Plan, all other Residential gas program budgets decreased.
- b. The Company's proposed Residential gas plan achieves an overall Rhode Island Test cost-benefit ratio of 1.55 compared to 1.52 in 2025, a total participant cost of \$4,138,800 compared to \$4,728,700 in 2025, and total Rhode Island Test benefits of \$33,828,100 compared to \$33,327,600 in 2025. Additionally, all Residential gas programs in the proposed 2026 Annual Plan achieve a cost of efficiency lower than the cost of additional supply. These metrics demonstrate compliance with Least Cost Procurement standards and a greater positive impact to Rhode Islanders than the previous year's Residential gas plan.

Division 1-35  
Other

Request:

Bates Page 60 provides a list of six methodological changes made in 2026 including: “5. Review of Non-Energy Impacts (“NEIs”) to avoid double counting”.

- a. Please provide the change to the 2026 proposed electric plan NEI benefits due to this change.
- b. Please provide the change to the 2026 proposed gas plan NEI benefits due to this change.

Response:

- a. The change in electric portfolio NEI benefits due to the removal of double counting is -\$784,895.

Please note that in preparing the response to this data request, the Company identified an error in the calculation of NEIs in the electric portfolio. Specifically, the Company identified that a linking error occurred when the Company was updating the NEI values at the conclusion of its investigation into potential double counting that resulted in understating the NEI benefits. In the filed 2026 Annual Plan, the total electric portfolio NEI benefits should have been \$26,612,933 instead of the \$20,930,000 shown in the filed Attachment 5, Table E-3A. The -\$784,895 change in NEI benefits is relative to the corrected amount. The Company will file updated Attachment 4-1 and Attachment 5 tables reflecting this correction prior to the evidentiary hearings in this docket.

- b. The change to the 2026 proposed gas plan NEI benefits due to this change is -\$1,186,180. Gas portfolio NEI benefits were not affected by the linking error discussed in section (a) above.

Division 1-36  
Other

Request:

Bates Pages 97 and 98 discuss equity metrics. Please provide the targets for these equity metrics for the 2025 plan and 2026 proposed plan.

Response:

The Company did not establish specific targets for equity metrics in the 2025 Annual Plan or the proposed 2026 Annual Plan. Instead, the Company has been focused on gathering accurate and consistent data for these metrics to better understand performance baselines. In support of this effort, the Company will continue to report on these metrics in its quarterly reports and is planning to better contextualize these metrics in 2026 using data visualization, trend analysis, and supplemental data points.

Division 1-37  
Other

Request:

Bates Page 104 states: "Rhode Island Energy currently offers several financing vehicles to customers including on-bill financing for business customers which is administered by Rhode Island Energy, HEAT Loan, and financing through the Efficient Buildings Fund, a program jointly administered by OER and Rhode Island Infrastructure Bank (RIIB). In 2026, Rhode Island Energy will continue to rely primarily on on-bill financing to support business customers to fund their share of energy efficiency project costs, investigate how these offerings can be expanded to serve more residential customers and increase loan limits for residential comprehensive projects." Also, Rhode Island Energy 2026 Electric Revolving Loan Fund Projections on Bates Page 247 and Rhode Island Energy 2026 Gas Revolving Loan Fund Projections on Bates Page 248 show no injections for any fund in 2026.

- a. At what point will RIE need injections for any fund?
- b. Are there any funds for which loan fund repayments are outpacing use? If so, please identify which funds and the extent to which fund repayments are outpacing use.
- c. If there are any funds for which load fund repayments are outpacing use, does RIE have any plans to increase use? If so, please explain.
- d. If there are any funds for which load fund repayments are outpacing use and RIE does not think it can use these funds, what does RIE recommend doing with the accumulating repayments?

Response:

- a. Based on the current Business loan fund balances, inflows and outflows, the Company is not currently projecting to need injections of funds into the on-bill financing of the Business Loan Funds.
- b. Repayments are outpacing new loans for all three loan funds.
- c. At this time, the Company is evaluating how to better leverage these loan funds by extending the loan terms in order to support customers' investments in energy efficiency projects with longer payback while potentially mitigating increases in Company rebates. For example, the Company is assessing whether it can reduce the 70 percent Company co-pay for converting Small Business customers from electric resistance heat to heat

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pumps by offering these customers a loan with a longer loan term up to the customer's payback for the project (e.g. 5, 6 or 7 years). The Company anticipates similar opportunities for extending the loan term for Large C&I electric and gas projects.

- d. Rhode Island Energy believes a portion of the Electric Large C&I Revolving Loan Fund balance could be transferred to the general energy efficiency fund balance. Repayments are currently outpacing new commitments and the Company believes the funds will be in excess for a period until more future projects come to fruition.

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Request:

Bates Page 113 states: "Rhode Island Energy collaborated with the Green and Healthy Homes Initiative (GHHI) in its pursuit of a Regional Greenhouse Gas Initiative (RGGI) funding opportunity from OER for its Providence Whole House + Electrification Pilot. This initiative is modeled on a successful New Jersey program funded by the New Jersey Board of Public Utilities. Designed to address pre-weatherization barriers (PWBs) that prevent low-income households from accessing energy efficiency and weatherization services, the pilot aims to remediate these issues in up to 75 housing units, enabling them to re-enter existing weatherization programs. Of these, 10 units will be selected for full electrification or electrification readiness upgrades, with the goal of improving indoor air quality, reducing greenhouse gas emissions, and lowering energy burdens for residents."

- a. What happens to the other 65 housing units (the 75 with pre-weatherization barriers addressed that are not selected for full electrification or electrification readiness upgrades) after the pre-weatherization barriers are addressed and the home is weatherized?
- b. How many of these 65 housing units could be eligible for CHRI and served through that program?

Response:

- a. Those homes, in addition to preweatherization barrier remediation and weatherization upgrades, will also participate, to the extent possible, in any other Rhode Island Energy efficiency programs and receive any upgrades to which they are entitled. The units will also be considered for OER's Home Electrification and Appliance Rebates ("HEAR") (for which electrical panel upgrades are eligible) and the Clean Heat Rhode Island ("CHRI") program. The energy consumption and cost data for all participants will be tracked for five years to evaluate the impacts of this intervention.
- b. GHHI applied for approximately \$1.8 million RGGI funding and received approximately \$1.1 million from OER. GHHI is reevaluating their budget and the number of homes receiving these services will likely be reduced from 75. That said, once the home is weatherized the unit would be eligible for CHRI provided it has existing delivered fuel heat (a CHRI requirement). As GHHI has not yet determined the homes that will participate in the pilot, it is not possible to provide an exact number of housing units that

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Other

would be eligible (GHHI does not yet know the existing heating systems of the participants).

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Other

Request:

Bates Page 118 states: "The monetization of benefits also incorporates the latest EM&V results that affect claimable savings in the programs."

- a. Please provide the change to the 2026 proposed electric plan annual and lifetime savings and benefits by program and in total due to the incorporation of EM&V results.
- b. Please provide the change to the 2026 proposed gas plan annual and lifetime savings and benefits by program and in total due to the incorporation of EM&V results.

Response:

Please see the table below for both parts a and b. Please note that negative values indicate a decrease resulting from the incorporated changes.

Please note that the baseline proposed electric plan benefits used for this comparison were corrected to account for an error in weatherization NEI values identified in the Company's response to Division-1-35.

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**Change in plan annual and lifetime savings and benefits by program due to  
EM&V**

	(a)	(b)	(c)
<b>Electric</b>			
Program	Annual MWh	Lifetime MWh	Benefits
1 <b>Residential</b>	<b>-419</b>	<b>-2,669</b>	<b>-\$1,060,372</b>
2 Residential New Construction	0	0	\$0
3 Residential HVAC	0	-4	\$28,243
4 EnergyWise Single Family	0	0	\$0
5 EnergyWise Multifamily	6	117	\$25,814
6 Home Energy Reports	0	0	\$0
7 Residential Consumer Products	-424	-2,782	-\$1,114,429
8 <b>Income Eligible</b>	<b>-506</b>	<b>-7,170</b>	<b>\$219,478</b>
9 Income Eligible Single Family	-448	-7,179	\$223,476
10 Income Eligible Multifamily	-58	9	-\$3,998
11 <b>Commercial &amp; Industrial</b>	<b>0</b>	<b>0</b>	<b>\$120,382</b>
12 Large C&I New Construction	0	0	\$53,285
13 Large C&I Retrofit	0	0	\$67,097
14 Small Business Direct Install	0	0	\$0
15 <b>Total</b>	<b>-924</b>	<b>-9,839</b>	<b>-\$720,512</b>
<b>Gas</b>			
Program	Annual Gas MMBtu	Lifetime Gas MMBtu	Benefits
16 <b>Residential</b>	<b>1</b>	<b>17</b>	<b>\$110,533</b>
17 Residential New Construction	0	0	\$109,533
18 Residential HVAC	0	-2	-\$94
19 EnergyWise Single Family	0	0	\$0
20 EnergyWise Multifamily	1	20	\$1,094
21 Home Energy Reports	0	0	\$0
22 <b>Income Eligible</b>	<b>-360</b>	<b>-3,899</b>	<b>-\$95,009</b>
23 Income Eligible Single Family	-403	-4,549	-\$122,912
24 Income Eligible Multifamily	43	650	\$27,904
25 <b>Commercial &amp; Industrial</b>	<b>-524</b>	<b>-6,727</b>	<b>-\$148,013</b>
26 Large C&I New Construction	-19	-230	-\$4,766

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27	Large C&I Retrofit	-407	-4,741	-\$102,991
28	Small Business Direct Install	-106	-1,893	-\$43,034
29	C&I Multifamily	9	138	\$2,777
30	<b>Total</b>	<b>-883</b>	<b>-10,609</b>	<b>-\$132,490</b>

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Other

Request:

Bates Page 177 states: "As 2026 is the final year of the 3-year EE Plan, Rhode Island Energy will use 2026 to develop a process to only incentivize condensing gas equipment incentives when the current/failed equipment is non-condensing. While this will help make efficient use of gas program funds, this will also add another administrative layer of eligibility screening to the process."

- a. Please define condensing and non-condensing gas equipment in greater detail.
- b. What proportion of existing gas equipment is assumed to be condensing vs. non-condensing?
- c. What is the rationale for RIE's proposal to incentivize only condensing gas equipment when the current/failed equipment is non-condensing?

Response:

- a. Condensing equipment refers to equipment that contains condensing furnaces. A condensing gas furnace is a high efficiency heating system that utilizes a secondary heat exchanger to extract additional heat from combustion gases, achieving an Annual Fuel Utilization Efficiency ("AFUE") rating of 90% or better, compared to around 80% for standard models. A non-condensing gas furnace is a traditional heating system that uses a single heat exchanger to convert fuel into heat, typically achieving an efficiency rating of around 80% AFUE.
- b. The Company does not assume the proportion of existing condensing and non-condensing gas equipment.
- c. The Company's rationale behind incentivizing only condensing gas equipment when the current/failed equipment is non-condensing is that condensing equipment is generally more efficient than non-condensing equipment. The Company weighed stakeholder input, customer feedback, and observed trends in neighboring states to make this decision. The Company believes that high efficiency gas heating equipment is in the best interest of customers from an affordability standpoint while also delivering greenhouse gas emissions reductions. The Company will gather information in 2026 to observe the instances of condensing-to-condensing replacements.

Division 1-41  
Other

Request:

Bates Page 105 states: "Rhode Island Energy will target electric heat resistance heat pump upgrades as outlined in Rhode Island Energy's Electric Resistance Heating to Air Source Heat Pumps: Implementation Plan for the Income Eligible Sector. Rhode Island Energy was directed by the Commission to develop the Heat Pump Plan to achieve 750 conversions annually by 2026 with 25 percent of those customers served classified as income eligible RIE will continue to target electric resistance heat to heat pump upgrades".

- a. Is RIE targeting achievement of this Heat Pump Plan conversion goal in 2026?
- b. If not, what targets is RIE proposing and how do they compare to the Heat Pump Plan goal for 2026?
- c. If not, why is RIE proposing different targets?

Response:

- a. Rhode Island Energy is not targeting the achievement of this Heat Pump Plan conversion goal in 2026.
- b. Rhode Island Energy is proposing to install 921.19 tons of air source heat pumps for electric resistance heat customers through the HVAC and EnergyWise Single Family programs. The Company is also proposing to install 280 tons of air source heat pumps through the Income Eligible Single Family Program. In the EnergyWise Multifamily Program, the Company is planning to install 28,800 kWh of air source heat pumps and in the Income Eligible Multifamily Program, it is planning to install 225,000 kWh of air source heat pumps. There is no direct comparison of these goals to the target of 750 conversions annually by 2025 as outlined in the Heat Pump Plan. The Company plans its multifamily program goals in kWh, and, in the 2026 Annual Plan, the Company moved to a per ton savings and incentive structure for its single-family electric resistance heat to air source heat pump measures. Furthermore, there are no specific program-level goals for 2026 outlined in the Heat Pump Plan. However, the 2026 proposed income eligible goals represent over 25% of the total tonnage installed through the single-family programs and well over 25% of the kWh savings delivered through the multifamily programs.
- c. Please refer to the response to section (b) above. For the single-family programs, Rhode Island Energy adopted the savings on a per ton basis to enhance the accuracy of reporting

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heat pump savings, recognizing the variability in heat pump sizing across residential installations.

Please note that the quoted statement in this request found on Bates page 105 of the Annual Plan should read "Rhode Island Energy was directed by the Commission to develop the Heat Pump Plan to achieve 750 conversions annually by 2025 with 25 percent of those customers served classified as income eligible RIE will continue to target electric resistance heat to heat pump upgrades." (Correction underlined). The "by 2026" language should read "by 2025" consistent with Commission Order No. 24845 in Docket No. 22-33-EE.