

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN: REVIEW OF RHODE ISLAND)
ENERGY'S ANNUAL ENERGY)
EFFICIENCY PLAN FOR 2026)**

DOCKET NO. 25-37-EE

**PRE-FILED DIRECT TESTIMONY
OF
CRAIG JOHNSON**

**SUBMITTED ON BEHALF OF
THE RHODE ISLAND
ENERGY EFFICIENCY AND RESOURCE MANAGEMENT COUNCIL**

NOVEMBER 7, 2025

1 **I. INTRODUCTION**

2

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

4 A. I am Craig Johnson. My business address is: Optimal Energy, an NV5 Company,
5 225 Dyer St 2nd Floor, Providence, RI 02903.

6 **Q. On whose behalf are you testifying?**

7 A. I am testifying on behalf of the Rhode Island Energy Efficiency and Resource
8 Management Council (“the Council”).

9 **Q: Please summarize your work with the Council relevant to your role**
10 **providing testimony in this docket.**

11 A: I am a Senior Consultant at Optimal Energy, an NV5 Company, the prime
12 contractor for the Council’s Consultant Team (C-Team). I have been a member of
13 the C-Team since 2014 and have been the project manager since June 2024. I
14 have represented the Council in past dockets related to energy efficiency plans. I
15 have worked in close collaboration with the Council throughout the 2026 Annual
16 Energy Efficiency Plan (“2026 Plan” or “the Plan”) development process and had
17 overall responsibility for the C-Team’s review of the 2026 Plan. I was also the co-
18 author for the Council’s *Cost-Effectiveness Report: Rhode Island Energy’s 2026*
19 *Energy Efficiency Plan* which was filed with the Public Utilities Commission
20 (“the Commission”) in this same Docket.

21

22 **Q: What is the purpose of your Testimony in this proceeding?**

23 A: The purpose of my testimony is to summarize the Council’s engagement in the
24 development of Rhode Island Energy’s (RIE) 2026 Plan. It includes a summary of
25 the process we took to develop an additional amount of savings which the Council
26 has proposed for the Commission to consider in this docket, follow-ups from the
27 2025 Plan docket, a general overview of the Council’s engagement in the plan
28 development process from start to finish, and a summary of key comments and
29 recommendations we provided on the plan and our assessment of RIE’s
30 responsiveness.

1 **II. ADDITIONAL SAVINGS SUMMARY**

2
3 **Q: In the testimony of Councilor Peter Gill Case, he describes an additional**
4 **level of savings that the Council is proposing and requesting the Commission**
5 **approve. Are you familiar with this testimony?**

6 A: Yes, I am familiar with Councilor Gill Case's testimony. In his testimony he notes
7 that the Council proposes and requests that the Commission approve a savings
8 goal of 557,735 lifetime MWh for the electric portfolio and 2,229,682 lifetime
9 MMBtu for the gas portfolio. He further directs readers of his testimony to refer
10 to the pre-filed testimony of myself and Adrian Caesar for detail on how these
11 savings numbers were developed.

12
13 **Q: Please describe the overall approach to developing an additional level of**
14 **savings for the 2026 Plan.**

15 A: Our overall approach to identifying additional savings beyond those included in
16 the proposed 2026 Plan involved reviewing actual program performance to
17 identify areas where the proposed level of activity in the 2026 Plan was lower
18 than what was just recently achieved in 2024. We conducted this analysis at the
19 measure and/or end-use level, and utilized quantities and/or gross annual savings
20 to control for changes in measure impact factors such as per-unit saving, measure
21 lives, and net-to-gross ratios. We also accounted for elements like changes to
22 codes and standards as well as Council priorities around not increasing fossil fuel
23 usage on the gas side of the portfolio. Once measures and/or end-uses were
24 identified, we utilized assumptions from the filed plan to estimate a level of
25 additional net lifetime savings that could be achieved.

26
27 To determine the additional budget that would be needed to support these
28 measures, we utilized cost assumptions, accounting for both incentive and non-
29 incentive costs, included in the filed plan. Using this methodology, we determined
30 that the additional savings we identified in each sector all could be achieved at a

1 cost-to-achieve that is lower than the sector's cost-to-achieve in the 2026 plan as
2 filed.

3
4 We also estimated the impact that the additional budget required to deliver these
5 savings would have on the systems benefit charge. We did this by adding the
6 additional budget estimate to the "Projected Budget" amount in Table E-1A and
7 Table G-1 of the BCR model for electric and gas respectively. With the additional
8 budget added, we were able to observe the impact on the Proposed Energy
9 Efficiency Program Charge Including Uncollectible Recovery (\$/kWh) also
10 included in those same tables.

11
12 **Q: Please describe the additional savings you identified.**

13 A: For the electric portfolio, we identified an additional 64,721 net lifetime MWh
14 savings. This would bring the planned savings goal for the electric portfolio up to
15 557,735 lifetime MWh savings, or approximately 93.6% of the 2025 savings goal.
16 Of the additional 64,721 net lifetime MWh savings identified, 7,147 MWh (11%)
17 came from the residential sector, 792 MWh (1%) came from the income eligible
18 sector, and 56,782 MWh (88%) came from the commercial and industrial sector.

19
20 For the gas portfolio, we identified an additional 179,796 net lifetime MMBtu gas
21 savings. This would bring the planned savings goal for the gas portfolio up to
22 2,229,682 lifetime MMBtu savings, or approximately 75.8% of the 2025 savings
23 goal. Of the additional 179,796 net lifetime MMBtu gas savings identified, 338
24 MMBtu (<1%) came from the residential sector, 3,861 MMBtu (2%) came from
25 the income eligible sector, and 175,597 MMBtu (98%) came from the commercial
26 and industrial sector.

27
28 Please see Attachment 1 for a more granular breakdown as well as pre-filed
29 testimony of Adrian Caesar for a more detail discussion on the approach for
30 developing additional savings for the commercial and industrial sector.

31

1 **Q: Please describe the additional budget you estimate would be required to**
2 **deliver these savings.**

3 A: For the electric portfolio, we estimate the additional savings would require
4 \$4,775,899 in budget. Of the additional budget estimated, \$573,221 (12%) comes
5 from the residential sector, \$235,271 (5%) comes from the income eligible sector,
6 and \$3,967,407 (83%) comes from the commercial and industrial sector. With
7 these estimates, the additional savings across the electric portfolio would have a
8 cost-to-achieve of approximately \$0.07 per lifetime kWh, which is lower than the
9 filed portfolio cost-to-achieve of \$0.15 per lifetime kWh.

10

11 For the gas portfolio we estimate the additional savings would require \$1,583,615
12 in budget. Of the additional budget estimated, \$1,653 (<1%) comes from the
13 residential sector, \$45,264 (3%) comes from the income eligible sector, and
14 \$1,536,698 (97%) comes from the commercial and industrial sector. With these
15 estimates, the additional savings across the gas portfolio would have a cost-to-
16 achieve of approximately \$8.81 per lifetime MMBtu, which is lower than the filed
17 portfolio cost-to-achieve of \$18.58 per lifetime MMBtu.

18

19 **Q: Please describe the impact this additional budget would have on the systems**
20 **benefit charge and the bill impact this would have on an average residential**
21 **customer.**

22 A: For the electric portfolio, we estimate that the resulting systems benefit charge
23 would be \$0.00652 per kWh, which would represent a \$0.00065 increase over the
24 proposed plan's systems benefit charge of \$0.00587 per kWh and a \$0.00251
25 decrease from the systems benefit charge approved as part of the 2025 Plan of
26 \$0.00903 per kWh. The bill impact on an average residential electric customer
27 using 500 kWh per month on the A-16 rate would be \$3.26 per month, or \$0.33
28 more per month than the 2026 Plan as currently proposed and \$1.26 per month
29 less than the 2025 Plan as currently being implemented.

30

1 For the gas portfolio, we estimate that the resulting systems benefit charge would
2 be \$1.323 per MMBtu for residential and income eligible customers, which would
3 represent a \$0.001 increase over the proposed plan's systems benefit charge of
4 \$1.322 per MMBtu and a \$0.173 increase over the systems benefit charge
5 approved as part of the 2025 EE Plan of \$1.150 per MMBtu. The impact on an
6 average residential gas customer using 845 therms per year would be \$11.18 per
7 month, or \$0.01 more per month than the 2026 Plan as currently proposed and
8 \$1.46 per month more than the 2025 Plan as currently being implemented.
9 Further, we estimate that the resulting systems benefit charge would be \$0.200 per
10 MMBtu for commercial and industrial customers, which would represent a \$0.088
11 increase over the proposed plan's systems benefit charge of \$0.112 per MMBtu
12 and a \$0.33 decrease from the systems benefit charge approved as part of the
13 2025 EE Plan of \$0.530 per MMBtu.

14 15 **III. 2025 EE PLAN DOCKET FOLLOW UPS**

16
17 **Q: Can you describe the purpose of this section of your testimony.**

18 A: The purpose of this section of the testimony is to highlight a few items that were
19 discussed during the docket proceedings on the 2025 EE Plan and to provide a
20 brief summary of our understanding of the Commissions position, requests, and
21 any action the Council has taken as a result.

22
23 **Q: Please summarize your understanding of the Council's request related to a**
24 **roadmap for an equity-based performance incentive mechanism, the**
25 **Commission's position, and the Council's understanding of the**
26 **Commission's position.**

27 A: The Council requested a ruling from the Commission to direct RIE to establish a
28 roadmap towards an equity-component of the performance incentive mechanism.
29 The Commission ultimately declined this request, noting that it was satisfied with
30 RIE's progress and trajectory toward gathering additional equity data and
31 developing equity metrics. The Commission further noted that the existing service

1 quality adjustment mechanism sufficiently holds RIE accountable for delivering
2 planned income-eligible and multifamily program benefits at the planned level by
3 deducting earnings if RIE underperforms. The Council understands the
4 Commission’s ruling and appreciates that the Commission shares the Council’s
5 concern regarding underserved populations.
6

7 **Q: Please summarize your understanding of concerns raised by the Commission**
8 **related to the Council’s website and any corrective action the Council has**
9 **taken to be responsive to those concerns.**

10 A: The Commission flagged a few items on the Council’s website that they felt
11 needed some updates. First, they noted that the “About” page did not make
12 reference to the Council’s statutorily given name – The Energy Efficiency and
13 Resource Management Council – and recommended that that be updated so that
14 the public could better understand that the Council is the Energy Efficiency and
15 Resource Management Council and that it is doing its business as the Energy
16 Efficiency Council. Second, the Commission noted that some of the information
17 provided on the “Frequently Asked Questions” page had some outdated answers,
18 included the one about cost of supply compared to the cost of energy efficiency.
19

20 The Council has since updated its website to address the specific concerns raised
21 by the Commission and will continue to do its best to periodically review content
22 site-wide to ensure it is accurate and up-to-date.
23

24 **Q: Please summarize your understanding of feedback the Commission provided**
25 **related to how the Council presented its proposed budget and associated**
26 **testimony and how the Council has taken that feedback into consideration.**

27 A: The Commission requested that in future filings, the Council present its budget
28 proposal in comparison to the authorized budget. This came about because the
29 Commission approved a 2024 budget level that was less than what the Council
30 had requested, and then filed comparisons of its 2025 budget request to the 2024
31 proposal and not what was approved by the Commission.

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The Council considered this feedback when drafting its 2026 budget testimony (filed by Councilor Peter Gill Case on behalf of the Council on October 17, 2025). This was, however, not something that the Council had to reckon with because the Commission approved the Council’s 2025 budget level as proposed. The Council will of course keep this request in mind in any future filings where its approved budget is less than the budget it has proposed.

IV. ENGAGEMENT IN 2026 PLAN DEVELOPMENT PROCESS

Q: Can you describe how the Council engaged in RIE’s 2026 Plan development process?

A: The Council’s engagement in RIE’s 2026 Plan development process began with the January 16, 2025 Council Meeting, which focused on discussion of the Council’s engagement continued throughout 2025 as it engaged in review of the 2026 Plan Outline Memorandum, the First, Second, and Third Drafts of the 2026 Plan, all leading up to the Council’s vote on the Plan at its September 25, 2025 meeting and RIE’s filing of the Plan on October 1, 2025.

The following questions in this section broadly cover the Council and its C-Team’s engagement in this process. A more detailed discussion around review and comments on the Main Text and Residential and Income Eligible, and Evaluation, Measurement and Verification attachments of the Plan are provided in the sections below¹.

Q: Can you explain the Council’s process for reviewing RIE’s 2026 Plan Outline Memorandum?

A: On April 4, 2025, RIE shared the 2026 Plan Outline Memorandum, which documented the structure of the 2026 Plan, listed all expected Plan attachments,

¹ Please see pre-filed testimony of Adrian Caesar in this docket for the more detailed discussion around review and comments on the Commercial and Industrial attachment.

1 and highlighted strategies for program design and implementation. At its April 17,
2 2025 Meeting, the Council received a presentation from RIE summarizing the
3 2026 Plan Outline Memorandum. The C-Team shared its comments on the 2026
4 Plan Outline Memorandum with RIE on April 25, 2025. At its May 15, 2025
5 meeting, the Council received a memo summarizing these comments. The
6 Council also received a presentation from RIE with updates on 2026 Plan
7 activities including comments received by RIE on the Plan Outline Memorandum.
8 The Council also discussed the tradeoffs between short-term costs and benefits
9 versus the long-term harm incurred by the 2026 Plan budget reductions.

10
11 **Q: Can you explain the Council's process for reviewing the First Draft of RIE's**
12 **2026 Energy Efficiency Plan?**

13 A: RIE shared the First Draft 2026 Plan Narrative on June 20, 2025, along with the
14 following Plan attachments:

- 15 • Attachment 1 – Residential & Income Eligible Programs
- 16 • Attachment 2 – Commercial & Industrial Programs
- 17 • Attachment 3 – Evaluation, Measurement, & Verification (EM&V) Plan
- 18 • Attachment 4 – Rhode Island Test Description
- 19 • Attachment 5 – Electric Tables
- 20 • Attachment 6 – Gas Tables
- 21 • Attachment 7 – Demonstrations, Pilots, & Assessments (DPAs)
- 22 • Attachment 8 – Standardized Definitions for the 2026 Annual Efficiency
23 Plan

24
25 At its June 26, 2025 meeting , the Council received presentations from RIE on the
26 First Draft 2026 Plan Narrative. The Council's primary concerns were the
27 significant cuts to the 2026 Plan's budget and savings goals relative to the 2025
28 Plan.

29
30 RIE also shared the First Draft 2026 Plan Benefit Cost Ratio (BCR) Model on
31 June 20, 2025 and Technical Reference Manual (TRM) Database on June 27,

1 2025, which enabled detailed quantitative review of the First Draft 2026 Plan. The
2 Council's quantitative review aims to assess portfolio- and sector-level savings
3 and spending, accuracy and reasonableness of measure-level inputs, program
4 cost-effectiveness, alignment between the Plan Narrative and BCR Model, and
5 whether outputs of the BCR Model reflect stakeholder input and priorities.

6
7 The Council's C-Team compiled and shared its feedback and data related
8 questions on the First Draft 2026 Narrative with RIE on July 7, 2025. The C-
9 Team followed up and shared comments related to its review of the first draft of
10 the Plan's TRM on July 11, 2025.

11
12 At its July 17, 2025 Meeting, the Council received presentations from RIE and C-
13 Team reviewing quantitative and qualitative elements of the Plan, as well as a
14 summary memo from the C-Team on the comments it provided on narrative
15 components of the Plan. Prior to this meeting, RIE indicated that it identified
16 errors in the First Draft BCR Model and shared a Corrected First Draft with the
17 Council's C-Team. These errors resulted in a notable overstatement of planned
18 gas savings, mainly in the Income Eligible sector.

- 19 • First Draft Lifetime Gas Portfolio Savings: 2,910,555 MMBtu
- 20 • Corrected Lifetime Gas Portfolio Savings: 2,291,175 MMBtu

21
22 The Council review covered quantitative highlights, key drivers of change in
23 electric and gas savings goals compared to the 2025 Plan, and a review of the
24 First Draft 2026 Plan Narrative. The Council requested a more detailed analysis
25 of ratepayer impacts and collections.

26
27 **Q: Can you explain the Council's process for reviewing the Second Draft of**
28 **RIE's 2026 Energy Efficiency Plan?**

29 **A:** On August 4, 2025, RIE distributed the Second Draft of the 2026 Plan narrative,
30 its associated BCR model, and responses to the C-Team's data related questions
31 on the first draft of the Plan. RIE also distributed the Second Draft of the 2026

1 Plan TRM Database on August 11, 2025. The C-Team submitted narrative and
2 data related comments and questions to RIE on August 18, 2025 and additional
3 comments related to its review of the TRM database on August 19, 2025.

4
5 At its August 21, 2025 meeting, the Council received presentations from RIE and
6 C-Team focused on quantitative comparisons to previous Plans and actual
7 performance, changes between plan drafts, improvements from the First Draft,
8 and remaining areas for improvement. The Council also received a memo from
9 the C-Team that provided an assessment of responsiveness to its feedback
10 provided on the First Draft of the Plan. Council discussion topics included the
11 performance incentive, non-incentive costs such as marketing and sales, technical
12 assistance and training, and responsiveness to feedback.

13
14 **Q: Can you explain the Council's process for reviewing the Third Draft of RIE's**
15 **2026 Energy Efficiency Plan?**

16 A: On September 5, 2025, RIE distributed the Third Draft of the 2026 Plan narrative,
17 its associated BCR model, and responses to the C-Team's data related questions
18 on the second draft of the Plan. At its September 25, 2025 meeting, the Council
19 received presentations from RIE and C-Team. RIE's presentation focused on the
20 strategic priorities that informed plan development and outlined the changes
21 between the second and third drafts of the Plan, as well as anticipated changes
22 between the third draft and the version that would be filed with the PUC. The C-
23 Team's presentation reviewed portfolio-level savings and budgets and assessed
24 the degree to which the third draft was responsive to Council Priorities.

25
26 **V. FEEDBACK ON PLAN NARRATIVE**

27
28 **Q: Can you describe the purpose of this section of your testimony.**

29 A: The purpose of this section of the testimony is to describe the comments and
30 recommendations that the C-Team provided on the narrative of the first draft of
31 the 2026 Plan along with our assessment of RIE's responsiveness to those

1 comments and recommendations in the version of the plan that was filed with the
2 Commission. The following items are generally organized by the section in which
3 they appear in the Plan.²
4

5 **Q: Are there any overarching thoughts you feel are important to share with**
6 **respect to the comments you provided and your assessment of RIE's**
7 **responsiveness to those comments?**

8 A: Yes. When RIE delivered the first draft of the plan, they requested the
9 stakeholders provide feedback in a consolidated format as opposed to inline
10 comments. They noted that this would help reduce their time responding to
11 individual comments and would allow them to better address specific themes
12 echoed throughout stakeholder comments. While we continued our historical
13 process of compiling our feedback on the plan using inline comments, we were
14 responsive to the RIE's request by organizing our comments and associated
15 recommendations in a clear and transparent memo on the first draft of the plan.
16

17 We followed up with a similar version of that memo that highlighted our
18 assessment of RIE's responsiveness to our comments when we received the
19 second draft of the plan. RIE was responsive to some of our comments and did
20 indicate that they received, reviewed, and considered all feedback they received,
21 however, we arrived at the conclusion of the plan development process feeling
22 that too many of our recommendations never received a response from RIE or
23 were noted with a recommendation to consider them in future planning cycles.
24

25 **V.i. FEEDBACK ON PLAN NARRATIVE (MAIN TEXT)**
26

27 **Section 1.2 – Plan Summary**

² My testimony covers the Main Text, Residential and Income Eligible programs (Attachment 1) and the Evaluation, Measurement and Verification Plan (Attachment 3). Please refer to pre-filed testimony of Adrian Caesar for corresponding testimony on the Commercial and Industrial programs (Attachment 2).

1 **Q: What comments did you provide related to metrics and visualizations and**
2 **how did RIE address the comments and recommendations you provided?**

3 A: We noted that consistent metrics and visual aids throughout the plan summary
4 would improve clarity and allow for better comparability across sectors and fuels.
5 We made two recommendations:

- 6 • Portfolio savings are presented in different units (e.g. MWh for electric,
7 MMBtu for gas and delivered fuels), which makes assessing the overall
8 impact of the portfolio across fuel types challenging. This could be
9 addressed by including a single sentence that provides readers with the all-
10 fuel impact of the programs.
- 11 • Include easy-to-digest graphics such as a pie chart that shows the
12 distribution of all-fuel savings and benefits by fuel type (i.e. electric, gas,
13 oil, propane) and sector (i.e. residential market rate, income eligible, and
14 commercial and industrial).

15
16 When RIE shared the second draft of the Plan, it included pre-text language that
17 provided a broad response about adding metrics and data visualizations, but that
18 some were already included in quarterly and year-end reporting. For those that are
19 not currently included, RIE requested additional detail be provided to support
20 inclusion. This is something we may look to address leading into future energy
21 efficiency plans.

22
23 **Q: What comments did you provide related to Economic Benefits and the Rhode**
24 **Island Test and how did RIE address the comments and recommendations**
25 **you provided?**

26 A: We continued to recommend that the method for which economic development
27 benefits are treated in cost-effectiveness testing be re-evaluated. For several years
28 now, the economic development benefits from the program have been excluded
29 from the primary view of the RI Test due to valid concerns about potential
30 double-counting of benefits. The current method of presenting these benefits
31 alongside, but entirely separate from, the RI Test was a result of there not being a

1 better method available at the time. We still believe that it would be in the better
2 spirit of the RI Test to include a non-zero amount of economic development
3 benefits in the primary cost-effectiveness test that is sufficiently conservative to
4 avoid issues of double-counting. We made two recommendations related to this
5 item:

- 6 • Reopen dialogue with relevant stakeholders previously involved in the
7 decision to find a commonly accepted method of including some non-zero
8 amount of economic development benefits in the RI Test. If unable to do
9 for the 2026 Plan, commit to doing so in time to be addressed and utilized
10 in the next Three-Year Plan for 2027-2029.
- 11 • If an agreement can be made during Plan development this year, include
12 outcomes (i.e. some non-zero amount of economic benefits in the RI Test)
13 in the 2026 Plan.

14
15 RIE was partially responsive to this feedback. While they did not reopen the
16 dialogue for the 2026 Plan, they did communicate in delivering the third draft of
17 the Plan that they were open to discussing how the benefits of the RI Test could
18 be reevaluated or refined in future iterations for the next three year planning
19 cycle.

20 21 **Section 2 – Strategies and Approaches to Planning**

22 **Q: What comments did you provide related to language included in this section**
23 **and how did RIE address the comments and recommendations you**
24 **provided?**

25 A: This section includes language that builds on language originally included in the
26 2024-2026 Energy Efficiency Plan and suggests that the 2026 Plan accelerates
27 energy efficiency of Rhode Island homes and businesses. This statement runs
28 counter to the fact that the 2026 Plan proposes a significant scaling back of
29 savings goals and budgets. Our recommendation was to adjust the language to
30 better align with the reality of what the 2026 Plan is proposing from a savings and
31 spending perspective.

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While RIE did note throughout the planning process that it reviewed and considered all feedback received, it did not provide any direct response to our comment and recommendation on this matter.

Section 2.6.1 – Equity

Q: What comments did you provide related to equity integration across programs and how did RIE address the comments and recommendations you provided?

A: We noted that embedding equity into each individual program would ensure that underserved populations are not just considered in broad strokes but are actively and effectively reached through tailored strategies. Without program-specific equity content and commitments, efforts risk being too generic to drive meaningful change. We recommended that the Plan clearly articulate how equity strategies will be implemented in the write-up of each program. This could be included in both program descriptions in Attachments 1 and 2 and as a table in the Main Text.

When RIE shared the second draft of the Plan, it included pre-text language that indicated it would continue to use the approach of covering equity with a cross-cutting section and periodic mentions for program-specific items.

Q: What comments did you provide related to equity metrics and data tracking and how did RIE address the comments and recommendations you provided?

A: We noted that metrics are essential for accountability and continuous improvement and that tracking beyond participation is helpful to understand the depth of impact (e.g. energy savings per participant) being achieved. We provided three recommendations to RIE on this matter.

1 Our first recommendation was to track and report energy savings per participant,
2 especially in Environmental Justice Communities. Our second recommendation
3 was to include denominators for relevant metrics that are already being tracked
4 and reported to enable a better understanding of participation rates. Our third
5 recommendation was to add workforce development metrics, including diversity
6 indicators.

7
8 In the pre-text on RIE's third draft of the Plan, they noted that the equity metrics
9 currently being reported are relatively new and the process to generate, report, and
10 analyze them takes considerable effort and suggested that they would like time to
11 better gauge the utility of the existing metrics and would consider updates for the
12 2027-2029 plan cycle. In the meantime, RIE did indicate that they are exploring
13 new ways to visualize and contextualize the data measures by these metrics and
14 will share those with stakeholder groups once they are ready. While this is not
15 fully responsive to our recommendations, we do appreciate RIE's perspective and
16 its commitment to build on existing efforts. It is our expectation that RIE will
17 follow through on these commitments in 2026.

18
19 **Q: What comments did you provide related to the Equity Working Group's**
20 **(EWG) timing and impact and how did RIE address the comments and**
21 **recommendations you provided?**

22 A: We noted that the EWG plays a central role in shaping strategies that will
23 ultimately be utilized in advancing equitable design and delivery of the energy
24 efficiency programs. We raised a concern that if the EWG's recommendations are
25 delivered too late in the planning cycle, there is a risk that they won't
26 meaningfully influence program design. Our recommendation was for RIE to
27 commit to aligning the EWG's reporting timeline in 2026 with the planning cycle
28 so that recommendations of the EWG are available prior to the first draft of future
29 plans.

30

1 The process and timing for the EWG report has certainly improved in past years
2 and is now typically available during plan development, however, that does not
3 mean there is not room for improvement. In this past plan cycle, the EWG report
4 became available after the second draft of the Plan was already written, which left
5 inadequate time to incorporate the feedback into the Plan itself. RIE suggested
6 that further discussion on the scheduled delivery of the report should take place in
7 the EWG. It is my hope and expectation that this discussion will happen with the
8 EWG soon.

9 **Q: What comments did you provide related to transparency and reporting and**
10 **how did RIE address the comments and recommendations you provided?**

11 A: Readily available data builds trust and allows more stakeholders involved in the
12 process to assess progress towards equitable outcomes of the energy efficiency
13 programs. Transparency also supports collaborative problem-solving and
14 accountability. We recommended that RIE include the results from 2024 equity
15 metrics directly into Plan materials and provide a summary of what the data says.
16 This will become more important and relevant as additional years' worth of
17 metrics data becomes available.

18
19 RIE responded to this recommendation by noting that it directs readers to RIE's
20 quarterly and year-end reports that are filed with the Commission. While we
21 appreciate that the data collected is available in those formats, our preference
22 remains that this data and some discussion around it be included in the Plan itself.
23 Directing readers to other places does not provide the context within the Plan
24 itself, and adds an extra step for readers, especially as these data are spread across
25 multiple reports in multiple dockets.

26
27 **Q: What comments did you provide related to community partnerships and**
28 **outreach and how did RIE address the comments and recommendations you**
29 **provided?**

30 A: Community-based organizations are trusted messengers and essential partners in
31 reaching underserved populations. Evaluating the effectiveness of these

1 partnerships ensures resources are being used efficiently and effectively. We
2 recommended that RIE evaluate the effectiveness of partnerships like the Health
3 Equity Zones (HEZ) and Efficient Housing for All Community of Practice. We
4 also recommended that RIE expand on what it is learning from these partnerships
5 and how it complements its own internal efforts.

6

7 RIE did provide additional text in the Plan with a commitment to working closely
8 with these initiatives, and has been a willing and active participant in
9 conversations that the Council's vendor responsible for public education services
10 has been delivering.

11

12 **Q: What comments did you provide related to workforce diversity and how did**
13 **RIE address the comments and recommendations you provided?**

14 A: A diverse workforce ensures that the benefits of energy efficiency are shared
15 equitably and that services are culturally and linguistically accessible to all
16 communities. We recommended that RIE add content on workforce diversity
17 efforts, including support and expansion of minority and women-owned
18 businesses (MWBES), hiring contractors from diverse communities and those who
19 speak multiple languages, and prioritizing diversity in procurement processes. We
20 also recommended that RIE include metrics to track workforce diversity.

21

22 RIE did include a commitment to increase awareness by engaging with
23 organizations that support and have relationships with MWBEs. Adding metrics
24 to track workforce diversity was an item included in the EWG report for 2025,
25 and while that is included as an attachment to RIE's plan, it was not included as
26 an additional metric that RIE would track and report on.

27

28 **Section 2.6.2 – Workforce Development**

29 **Q: What comments did you provide related to metrics and evaluation and how**
30 **did RIE address the comments and recommendations you provided?**

1 A: Metrics help to assess the effectiveness of workforce development investments or
2 identify areas for improvement. We recommended that RIE include workforce
3 development metrics alongside planned activities, and clarify what metrics are
4 being used to measure success (e.g. growth in number of contractors, training
5 participants, etc.). We also recommended that RIE document and report on how
6 much of the workforce training budget was spent in prior plan years, and whether
7 it was sufficient to accomplish the goals of the training activities planned.

8
9 In the pre-text to the third draft of the Plan, RIE acknowledged that there is
10 interest in additional metrics and analysis with respect to its workforce
11 development efforts. RIE noted that they have discussed the potential metrics with
12 the PPL Supply Chain team and would continue to explore possibilities in the
13 future, but that they would not be adding any specific detail regarding these
14 metrics for the 2026 Plan. We plan to work with RIE, as they suggested, to
15 collaborate on the development of goals and methods of tracking progress through
16 sector strategy team meetings or other venues as appropriate. Our expectation is
17 that this applies to not just metrics and tracking of metrics, but also with respect to
18 better understanding how the workforce budget has been utilized and whether it is
19 or is not sufficient to accomplish the goals of the training activities as laid out in
20 the Plan.

21

22 **Q: What comments did you provide related to workforce development**
23 **descriptions and how did RIE address the comments and recommendations**
24 **you provided?**

25 A: Much of the content that describes workforce development activities remained
26 largely (if not entirely) unchanged from what was included in past plans for the
27 same activities. We noted that reusing unchanged language from previous plans
28 without updates may indicate a lack of progress or reflection on past efforts to
29 inform those that are being proposed. To address this, we recommended that RIE
30 update language from the 2025 Plan to reflect progress, lessons learned, and any

1 changes in strategy, including clarifying whether initiatives like energy auditor
2 recruitment and training have been successful or need new approaches.

3
4 We appreciate that RIE added language in the Plan to indicate that its staff
5 conducted a thorough review of trainings over the past two years with its lead
6 vendor to determine which warrant continued funding in 2026. However, we
7 maintain that it would be beneficial for the Plan to provide more detail about that
8 process to give the reader a better idea of the assessment that was made and how
9 it informed the maintenance or evolution of planned workforce training activities.

10 **Q: What comments did you provide related to training content and scope and**
11 **how did RIE address the comments and recommendations you provided?**

12 A: Proposed workforce training activities should be relevant, up-to-date, and aligned
13 with evolving technologies and workforce needs. We recommended that RIE
14 include heat pump water heaters in all relevant training programs, expand training
15 to include plumbers alongside HVAC contractors, and provide co-branded
16 educational materials for contractors to share with customers.

17
18 RIE was partially responsive to our feedback and recommendations. For example,
19 they did update the description around CAP training to include HPWHs, but
20 similar updates were not made elsewhere which left it unclear whether or not that
21 training would be interested in other relevant programs. RIE did not respond or
22 provide updates in the Plan related to our other recommendations in this area.

23
24 **Q: What comments did you provide related to building capacity for Community**
25 **Action Partnership Agencies and how did RIE address the comments and**
26 **recommendations you provided?**

27 A: Community Action Partnership (CAP) Agencies are critical for serving income
28 eligible customers, but many face staffing and capacity challenges. We suggested
29 that RIE commit to a process for considering new strategies for recruiting and
30 retaining auditors if current efforts are falling short.

31

1 RIE included language in the Plan that indicates that they believe the CAP
2 workforce is currently stable and dependable. Assuming that is true, it would
3 alleviate the need for a stronger commitment to a process for considering new
4 strategies for recruiting and retaining auditors for the CAPs. We will continue to
5 monitor this item to ensure that this stability and dependability is maintained.
6

7 **Q: What comments did you provide related to youth and pipeline development
8 and how did RIE address the comments and recommendations you
9 provided?**

10 A: Engaging students and young professionals helps build a long-term, sustainable
11 clean energy workforce. We recommended that RIE highlight and expand efforts
12 like the CCRI Industrial Assessment Center and Career & Technical Education
13 (CTE) partnerships and use inclusive language like “energy professionals” instead
14 of “workers” to elevate the desirability of employment in this field.
15

16 RIE did include an expansive section in the Plan related to its various efforts on
17 this matter and did update its terminology to be about energy professionals as
18 opposed to workers.
19

20 **Section 2.6.6 – Participation and Outreach**

21 **Q: What comments did you provide related to website usability and accessibility
22 and how did RIE address the comments and recommendations you
23 provided?**

24 A: RIE’s website is a primary access point for customers seeking information about
25 energy efficiency programs. RIE overhauled its website in 2024 to improve
26 navigability, readability, and accessibility. However, we still find that in some
27 regards it can be difficult to navigate, which can discourage participation,
28 especially among new or underserved customers. As an example, customers
29 looking for information on low-income programs currently need to know to look
30 in the “Assistance Programs” instead of the “Rebates and Savings Programs”
31 section under the “Ways to Save” header on RIE’s website. We provided two sets

1 of recommendations related to this comment. First, we recommended that RIE
2 commit to a process to improve the structure and navigation of program offerings
3 in a way that makes it easier for customers to find what they are looking for. One
4 potential improvement would be to structure the design such that customers
5 arriving at the site start with “residential” or “business” before being navigated to
6 programs that are eligible to them. MassSave.com does a reasonably good job at
7 this. Second, we suggested that RIE should consider developing or adapting a
8 mobile app to better serve younger mobile-first customers. This may apply more
9 broadly to RIE at large where energy efficiency offerings are a part of the overall
10 experience. We recognize that this is probably not something that would (or even
11 should) be directly funded by energy efficiency program dollars, but nonetheless
12 energy efficiency programming could play a notable roll in driving the
13 development of such a resource.

14
15 RIE indicated that they would provide new education content on the website, but
16 this does not address the overall structure and ease of navigation. While we are
17 not expecting RIE to include language around this directly in the Plan, we still
18 feel like ease of navigation of RIE’s energy efficiency offerings on its website
19 could be improved. They also noted that RIE had plans to launch an application
20 for bill payment in 2026, but that process would not involve energy efficiency
21 programs at this time. Our hope is that if and when RIE launches an application
22 for bill payment that it will be able to use that as a platform for expanding the
23 application to include other services and offerings, including energy efficiency.

24
25 **Q: What comments did you provide related to public-facing data and**
26 **transparency and how did RIE address the comments and recommendations**
27 **you provided?**

28 A: A public-facing dashboard would increase transparency, build trust, and allow
29 stakeholders to track performance in near-real time. This felt particularly
30 important during a recent period where RIE’s database transition efforts resulted
31 in little-to-no availability of data that would otherwise be publicly accessible

1 through its quarterly reports for much of 2024. We noted that the 2025 Plan
2 included language around the development and hosting of a public facing data
3 dashboard that would summarize key program metrics that would be updated
4 monthly, and that would be developed with stakeholder input and launched in
5 2025. Since this has not yet happened, we recommend including language on this
6 effort and plans to move forward and launch this previously promised dashboard
7 in the future.

8
9 RIE did not respond to this comment or recommendation and did not make any
10 updates to its Plan related to this matter. As it stands, it is unclear whether or not
11 RIE still has plans for development of a public facing dashboard.

12
13 **Q: What comments did you provide related to social media and influencer**
14 **outreach and how did RIE address the comments and recommendations you**
15 **provided?**

16 **A:** Social media influencers can help reach new audiences in a relatable and
17 engaging way, especially amongst younger demographics. The text around this in
18 the first draft of the 2026 Plan had not been updated and still indicated plans to
19 launch an effort that was originally contemplated for the 2024 Plan. We
20 recommended that RIE update the plan to reflect outcomes from efforts that were
21 launched in 2024 and clarify how this strategy will be evolved for 2026 based on
22 outcomes to-date.

23
24 RIE did include language in the Plan that discusses outcomes from past years and
25 its plans for additional campaigns in 2026.

26
27 **Section 5 – Coordination with Other Energy Policies and Programs**

28 **Q: What comments did you provide related to advanced metering functionality**
29 **(AMF) and grid modernization and how did RIE address the comments and**
30 **recommendations you provided?**

1 A: AMF is foundational for future energy efficiency strategies and customer
2 engagement and additional detail and commitments would benefit a better
3 understanding of upcoming activities. We recommended that RIE provide
4 breakdowns of meter installations by sector (e.g., residential vs. non-residential),
5 expand on what data analysis and customer segmentation will have occurred in
6 2025 and is expected to occur in 2026, and how they support future integration
7 into energy efficiency programs, and commit to reporting research and rollout
8 progress in its quarterly reports.
9 RIE added language to the Plan that points readers to its dedicated AMF webpage
10 where some data related to installations can be found. While this does not include
11 breakouts of meter installations by sector, it does allow for an understanding of
12 where meters have been checked and installed to date. RIE also added language
13 that elaborates on data analysis that it may conduct and how that could help
14 support future integration of AMF into the energy efficiency programs. RIE did
15 not commit to reporting on its research and rollout progress in its quarterly
16 reports, however we expect that RIE will be responsive to requests related to this.

17
18 **Q: What comments did you provide related to climate policy integration and**
19 **decarbonization strategy and how did RIE address the comments and**
20 **recommendations you provided?**

21 A: Integrating climate policy into the energy efficiency plan is essential for aligning
22 utility actions with Rhode Island's binding emissions reductions targets under the
23 Act on Climate. As the State moves toward a decarbonized energy system, RIE's
24 role in supporting emissions reductions, affordability, and system reliability
25 become increasingly important. We made three recommendations to RIE related
26 to this item. First, we suggested restoring paragraphs from the 2025 Plan that
27 addressed resiliency benefits, which were previously supported by stakeholders.
28 Second, we recommended that RIE reassess language in the Plan that suggested
29 energy efficiency increases rates and deters electrification. Finally, we suggested
30 that RIE consider all energy bills (not just electric and gas) when discussing
31 affordability impacts.

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RIE did not respond to or address these comments and recommendations in the filed Plan. We still contest that the language that suggests energy efficiency increases rates and deters electrification is misleading and that this assertion presupposes the following, all of which we think could be reasonably challenged:

- That energy efficiency has the impact of increasing long-term electric and gas rates, which is not necessarily true and should be answered through a robust long-term rate and bill impact analysis, not just assumed to be true;
- That changes to rates resulting from energy efficiency, if they are in fact increases, are economically significant enough to impact customer decision making;
- That customers make investment decisions based on rates rather than bills (which seems unlikely and is certainly not economically rational);
- That customers care specifically about their electric and gas bills, not the overall pocketbook impacts of energy efficiency programs (such as savings from delivered fuels resulting from increases in building efficiency or electrification); and
- That customers electrify primarily as an economic strategy, rather than in pursuit of environmental benefits, comfort benefits, social signaling, or other reasons that humans make decisions.

Q: What comments did you provide related to codes and standards updates and how did RIE address the comments and recommendations you provided?

A: Accurate savings estimates and compliance with updated codes are important for program credibility and effectiveness. RIE has updated savings estimates for some measures to reflect new code baselines or to eliminate measures that are now considered to be required under the new code without clearly defining the impacts on programs. Our recommendation to RIE was to include in the plan a summary of which measures were affected by the updates and the resulting changes in savings.

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RIE was not responsive to this recommendation.

V.ii. FEEDBACK ON PLAN NARRATIVE (RESIDENTIAL & INCOME ELIGIBLE PROGRAMS)

Q: Can you describe the purpose of this section of your testimony.

A: The purpose of this section of the testimony is to describe the comments and recommendations that the C-Team provided on the first draft Residential and Income Eligible Energy Efficiency Solutions and Programs (Attachment 1) of the Plan to RIE along with our assessment of RIE’s responsiveness to those comments and recommendations in the version of the Plan that was filed with the Commission. The following items are generally organized by the section (i.e. program) in which they appear in Attachment 1, with exception of the first two questions which are cross-cutting.

Cross-Cutting

Q: What comments did you provide related to marketing the residential and income eligible programs and how did RIE address the comments and recommendations you provided?

A: The marketing section of the residential and income eligible attachment is helpful to provide the high-level pathways and insights into how messaging is coordinated across RIE’s residential and income eligible programs, however, it does not provide specific details consistently throughout on how each program is marketed. We recommended that in addition to the offerings, eligibility criteria, and implementation and delivery sections of each program description, RIE add a section on how each program is marketed.

RIE was not responsive to this recommendation.

1 **Q: What comments did you provide related to approaches to addressing pre-**
2 **weatherization barriers and how did RIE address the comments and**
3 **recommendations you provided?**

4 A: Pre-weatherization barriers and RIE's approach to addressing these is covered in
5 some of the relevant programs, but not all. Even where covered, the level of detail
6 varies. We recommended that RIE provide a consistent level of detail on its
7 approaches for addressing pre-weatherization barriers in each of the EnergyWise
8 Single Family, Income Eligible, and Multifamily program narratives. As an
9 alternative, we suggested that there could be a dedicated section for pre-
10 weatherization barriers that describes RIE's approach for each of the three
11 program areas, what solutions are provided, and documentation of any differences
12 that might exist between said approach between the programs.

13

14 RIE was partially responsive to our comments and recommendations. The filed
15 plan does include more detail than was originally included in the Income Eligible
16 Single Family program and there is a similar section in the EnergyWise Single
17 Family program. However, RIE has not provided any detail about its approach for
18 addressing these barriers in its Multifamily programs.

19

20 **EnergyWise Single Family**

21 **Q: What comments did you provide related to the HEAT loan terms and**
22 **conditions and how did RIE address the comments and recommendations**
23 **you provided?**

24 A: The current structure of the HEAT Loan program, while effective in supporting
25 energy efficiency upgrades, may be contributing to rising program costs –
26 particularly due to the full interest rate buy-downs and broad eligibility criteria.
27 With tighter budgets, there is a need to explore ways to maintain access to
28 financing while improving cost-efficiency. We recommended that RIE commit to
29 revisiting the terms and conditions of the HEAT Loan, which could offer a
30 strategic opportunity to reduce overall program costs while maintaining access to
31 financing for energy upgrades. For example, adjusting the interest rate buy-down

1 structure—such as offering partial rather than full 0% financing or scaling
2 incentives based on income—could help stretch limited budgets further.
3 Additionally, refining eligible measures or prioritizing high-impact upgrades may
4 improve cost-effectiveness without compromising customer participation or
5 satisfaction.

6
7 RIE was responsive to this feedback and has made a commitment to revisiting the
8 potential for tiered interest rates for the HEAT loan that are tied to a customer’s
9 capacity for repayment.

10
11 **Q: What comments did you provide related to lead vendor reinspection rates**
12 **and how did RIE address the comments and recommendations you**
13 **provided?**

14 **A:** Under the current program design, the Lead Vendor verifies the completion of all
15 contracted work done by Independent Insulation Contractors (IICs). During the
16 reinspection, the Lead Vendor also completes project close out tasks with the
17 customer. Given that RIE also utilizes a third-party to conduct quality assurance
18 and control (QA/QC) of 5% of all assessments and weatherization projects, it
19 raises the question about the need for the Lead Vendor to verify the completion of
20 all projects. We recommended that RIE consider reducing the number of
21 reinspections, especially of jobs conducted by IICs that are well established and
22 successful. This could help streamline the project closeout process, reduce
23 program costs, and stretch program dollars further. Understanding the average
24 cost per project for the reinspection/close-out visits that the Lead Vendor
25 currently conducts could shed light on the potential cost savings opportunity that
26 might come from such a program design change.

27
28 RIE is in the process of completing a QA/QC process evaluation which may shed
29 light on some of the comments and recommendations we discussed during the
30 Plan development.

31

1 **Q: What comments did you provide related to lead vendor and IIC management**
2 **and how did RIE address the comments and recommendations you**
3 **provided?**

4 A: The current performance management approach for the Lead Vendor and IICs
5 primarily focuses on production metrics, which may not fully capture the quality
6 or impact of their work. This narrow focus could limit opportunities to drive
7 improvements in customer experience, contractor accountability, and overall
8 program effectiveness. Key Performance Indicators (KPIs) used by RIE to
9 manage performance of the Lead Vendor and the IICs could be expanded to go
10 beyond production metrics. Including measures such as customer satisfaction,
11 QA/QC performance, call-backs, energy savings or other indications of
12 performance may drive greater contractor performance. Taking this a step further,
13 having some type of scorecard for the Lead Vendor and IICs that is tied to
14 compensation, referrals, or future leads could be helpful in increasing program
15 efficiency and performance, and thus potentially help address budget concerns.

16
17 While RIE was not responsive to this feedback and recommendations for the 2026
18 Plan, they did indicate in the delivery of the second draft of the plan that they
19 were open to feedback on best practices and would consider developing more
20 KPIs for the next time the implementation programs are put out to bid.

21
22 **Q: What comments did you provide related to the detail on inclusion of heat**
23 **pump water heaters in this program and how did RIE address the comments**
24 **and recommendations you provided?**

25 A: The first draft of the 2026 Plan provided minimal detail regarding the inclusion of
26 heat pump water heaters (HPWHs) in the EnergyWise Single Family program,
27 leaving key aspects of the offering unclear. This lack of specificity may hinder
28 customer understanding and uptake of the measure, as well as limit stakeholder
29 confidence in the program's implementation strategy. We recommended that RIE
30 provide more detail in future drafts of the Plan to include, at minimum, how the

1 offering will be presented and delivered to customers, and what types of
2 customers will be eligible.

3
4 We recently learned in RIE's response to PUC 2-4 that it would not be moving
5 forward with a plan to explore an offering for heat pump water heaters in this
6 program and that the text in the program narrative that was filed was an error.
7 This decision was not communicated to us or the Council and we were
8 disappointed to learn that this change was made without discussion of
9 stakeholders.

10
11 **Income Eligible Single Family**

12 **Q: What comments did you provide related to lead vendor and CAP**
13 **management and how did RIE address the comments and recommendations**
14 **you provided?**

15 A: Like EnergyWise Single Family, the current performance management approach
16 for the Lead Vendor and the CAP Agencies primarily focuses on production
17 metrics, which may not fully capture the quality or impact of their work. This
18 narrow focus could limit opportunities to drive improvements in customer
19 experience, contractor accountability, and overall program effectiveness. KPIs
20 used by RIE to manage performance of the Lead Vendor and the CAP Agencies
21 could be expanded to go beyond production metrics. Including measures such as
22 customer satisfaction, QA/QC performance, call-backs, energy savings or other
23 indications of performance may drive greater contractor performance. Taking this
24 a step further, having some type of scorecard for the Lead Vendor and IICs that is
25 tied to compensation, referrals, or future leads could be helpful in increasing
26 program efficiency and performance, and thus potentially help address budget
27 concerns.

28
29 As noted in my response to a similar question for the EnergyWise program, RIE
30 was not responsive to this feedback and recommendations for the 2026 Plan, but
31 they did indicate in the delivery of the second draft of the plan that they were

1 open to feedback on best practices and would consider developing more KPIs for
2 the next time the implementation programs are put out to bid.

3

4 **Q: What comments did you provide related to cost management for appliance**
5 **replacement and how did RIE address the comments and recommendations**
6 **you provided?**

7 A: RIE is proposing to conduct a comprehensive review of appliances offered to
8 income-eligible customers through its appliance replacement program with the
9 goal of removing high-cost appliances from the list of items that are 100%
10 subsidized. We support this effort, and would like to better understand the details
11 and potential impact. Following the first draft we recommended that RIE estimate
12 the impact of these potential changes by evaluating data on frequency of
13 customers selecting high-cost appliances that are expected to be removed and how
14 much less expensive the options that will remain fully subsidized are. We also
15 recommended that they describe what they are defining as “high cost”.

16

17 RIE did improve the language around this effort in the filed plan by better
18 defining their intent, which by my understanding, is to remove product model that
19 have higher costs but similar savings to other available models. RIE was not,
20 however, responsive to our request to estimate the impact that these changes may
21 have.

22

23 **Q: What comments did you provide related to electric resistance to heat pump**
24 **conversions and how did RIE address the comments and recommendations**
25 **you provided?**

26 A: The first draft of the plan outlined some details around its efforts to target electric
27 resistance heat to heat pump conversions, but did not include any detail on recent
28 performance in this area and lacked detail on how these opportunities would be
29 identified and marketed. We recommended that RIE include a table that shows
30 annual goals and actual conversions achieved to date for recent program years
31 when this offering has existed. We also recommended that RIE provide more

1 detail on how RIE identifies opportunities and how marketing efforts support
2 customer enrollment.

3
4 RIE was partially responsive to these recommendations. The filed plan discusses
5 the use of surveys of customers with high winter electric usage to identify true
6 electric heating customers and use of marketing, outreach, and education through
7 the CAP agencies to make customers aware of this offering. That said, the plan
8 does not include a table or other presentation of historical data that would help put
9 its 2026 plan in context with recent performance.

10
11 **Q: What comments did you provide related to pre-weatherization barriers and
12 how did RIE address the comments and recommendations you provided?**

13 A: RIE indicated in the first draft of the Plan that it would be partnering with Green
14 and Health Homes Initiative (GHH) on a proposal to leverage Regional
15 Greenhouse Gas Initiative (RGGI) funds to address repairs in homes that have
16 been deferred from weatherization, but provided little detail into this partnership
17 or proposal. We recommended that RIE provide significantly more detail in the
18 plan on this proposal, including but not limited to level of funding, expected
19 impact, program details, and plans for evaluating offering performance.

20
21 RIE was largely responsive to our comments and recommendations on this matter.
22 Significant detail was added to the Main Text and Attachment 1 on Residential &
23 Income Eligible programs related to this effort.

24
25 **Multifamily (EnergyWise and Income Eligible)**

26 **Q: What comments did you provide related to lead vendor and CAP
27 management and how did RIE address the comments and recommendations
28 you provided?**

29 A: Unlike EnergyWise and Income Eligible Programs, the Multifamily program
30 narrative included no detail on RIE's performance management approach for the
31 Lead Vendor delivering these programs. We recommended RIE include narrative

1 similar to what is used in the EnergyWise and Income Eligible Single Family
2 programs to convey to readers what RIE's approach is to managing performance
3 of its Lead Vendor. We also recommended that RIE consider KPIs that expand
4 beyond production metrics. Including measures such as customer satisfaction,
5 QA/QC performance, call-backs, energy savings or other indications of
6 performance may drive greater contractor performance. Taking this a step further,
7 having some type of scorecard for the Lead Vendor and IICs that is tied to
8 compensation, referrals, or future leads could be helpful in increasing program
9 efficiency and performance, and thus potentially help address budget concerns.

10
11 RIE was not responsive to our recommendation to include similar language as is
12 used in the EnergyWise and Income Eligible Single Family programs to convey
13 RIE's approach to managing the performance of its Lead Vendor. With respect to
14 our recommendation on KPIs, as noted in my response to a similar question for
15 the EnergyWise program, RIE was not responsive to this feedback and
16 recommendation for the 2026 Plan, but they did indicate in the delivery of the
17 second draft of the plan that they were open to feedback on best practices and
18 would consider developing more KPIs for the next time the implementation
19 programs are put out to bid.

20
21 **Q: What comments did you provide related to proposed enhancements for these**
22 **programs and how did RIE address the comments and recommendations you**
23 **provided?**

24 **A:** Despite recent underperformance, the proposed plan offers little in the way of
25 innovation to improve performance and better serve this customer segment. Some
26 strategies such as offering energy benchmarking services to housing authorities
27 and leveraging Rhode Island's landlord rental registry database are mentioned,
28 but with little detail provided. We recommended that RIE provide significantly
29 more detail on planned enhancements and outreach strategies. Some other efforts
30 to consider for recruitment include:

- Landlord roundtables

- 1 • Partnerships with contractors that service Multifamily properties,
2 potentially including a finders' fee incentive
- 3 • Determining when renovations or other project upgrades are planned
4 and piggybacking energy upgrade services at that time
- 5 • Partnerships with engineering and architectural firms that serve
6 Multifamily properties to educate them on program benefits of
7 participating

8 RIE was largely responsive to this recommendation. The Multifamily program
9 narrative now includes detail necessary to help us better understand what their
10 outreach strategies are, including: continuation of landlord outreach events,
11 mailers, emails, and social media promotions, direct outreach to Multifamily
12 property owners and managers, outreach and coordination with RI Housing
13 Authority Partners, utilizing targeted marketing lists and the ALN database, and
14 building on the development of a Multifamily Retrofit Showcase and Awards
15 plan.

16
17 **Q: What comments did you provide related to prior enhancements that were**
18 **previously included in the 2025 Plan and how did RIE address the comments**
19 **and recommendations you provided?**

20 A: The 2025 Plan included a number of details about what RIE was intending to do
21 to try to improve participation in this segment, most of which were removed for
22 the first draft of the plan. We recommended that RIE reintroduce those items with
23 information on what RIE did or did not do and/or what is or is not working so
24 readers can better understand what RIE has already tested and what lessons it has
25 learned.

26
27 Our recommendations were partially addressed through inclusion of detail on
28 program enhancements (see discussion in prior question). However, there are still
29 some items that RIE tried or said they were going to try in the 2025 Plan that are
30 not followed up on here. For example, techniques to incentivize vendor
31 performance and enhanced weatherization incentives for multifamily property

1 owners where all occupants are renters. These are examples of things that are
2 “changing” from what was included in 2025 Plan (because they aren’t included in
3 2026) and it would be an improvement for this section to explain why.
4

5 **Residential High-Efficiency HVAC and Hot Water**

6 **Q: What comments did you provide related to support for new natural gas**
7 **equipment and how did RIE address the comments and recommendations**
8 **you provided?**

9 A: The first draft of the Plan proposed continuation of support for new gas
10 equipment and included over \$1,000,000 in incentives for gas heating and hot
11 water equipment. Given broad stakeholder interest in phasing out incentives for
12 new gas combusting equipment along with added pressures on budgets this year,
13 minimizing if not eliminating support for new gas equipment is a strategy that
14 should be considered. We recommended that RIE eliminate incentives for new
15 gas combusting equipment and consider reallocating funds to other measures that
16 save on existing gas usage. We also recommended that if incentives for new gas
17 equipment were to be maintained, that RIE should restrict this to gas space and
18 water heating incentives to homes where replaced/failed equipment was non-
19 condensing. We believe that there is little reason to support replacement of failed
20 or failing condensing equipment as customers are unlikely to backslide to less
21 efficient non-condensing equipment.
22

23 RIE was not responsive to our recommendation to eliminate incentives for new
24 gas combusting equipment or to limit incentives to homes where replaced
25 equipment was non-condensing in 2026. That said, RIE has made a commitment
26 to develop a process for this in 2026 and we look forward to working with RIE on
27 this.
28

29 **Residential Efficient Products**

1 **Q: What comments did you provide related to potential changes to ENERGY**
2 **STAR and how did RIE address the comments and recommendations you**
3 **provided?**

4 A: We noted that there is a potential that policy decisions being made at the Federal
5 level could result in a shutdown of the ENERGY STAR program. We highlighted
6 this because there would likely be some impact on the product offerings included
7 in this program in the event of a shutdown. We recommended that RIE include
8 language that acknowledges the possibility of ENERGY STAR shutting down,
9 what impacts it may have on plan implementation, and contingency plans that
10 may be needed.

11
12 When we received the second draft of the plan, we observed language in the pre-
13 text that discussed how RIE was considering this potential issue. While RIE does
14 not appear to be actively developing any sort of contingency plans, it does at least
15 seem apparent that RIE is monitoring potential changes in this space and will
16 address them on an as-needed basis if or when changes are needed. We will work
17 with RIE to continue to monitor this issue and will assist in any way we can
18 should it have any direct impacts on program offerings in 2026.

19
20 **Q: What comments did you provide related to its online marketplace and how**
21 **did RIE address the comments and recommendations you provided?**

22 A: The Plan proposes to continue the use of RIE's Online Marketplace to offer
23 customers the ability to purchase instant discount rebates on energy efficient
24 thermostats and water fixtures, among other available products. While we
25 generally support the use of online marketplaces as an avenue to reach customers,
26 we would like to better understand their cost and effectiveness. Since planning
27 tools do not differentiate between products that go through traditional channels
28 and those that go through the Online Marketplace, we don't have great insight
29 into how effective RIE's Online Marketplace is. We recommended that RIE
30 provide detail in the Plan about the effectiveness of the Online Marketplace to
31 both push energy savings products and to engage customers more broadly in

1 RIE's other program offerings. We also suggested that RIE provide detail on the
2 costs and benefits of the Online Marketplace so that readers can better understand
3 the value proposition of the offering.

4
5 RIE was not responsive to our comments and recommendations related to its
6 online marketplace.

7 **Residential New Construction**

8 **Q: What comments did you provide related to shifting to an all-electric new**
9 **construction program and how did RIE address the comments and**
10 **recommendations you provided?**

11 A: The Plan continues to include incentives and support for gas in new construction
12 projects. Given widespread stakeholder interest in shifting away from investments
13 that maintain or indeed expand the natural gas system, we recommended shifting
14 to an all-electric new construction program. Beyond addressing stakeholder
15 priorities related to the Act on Climate, this move could also potentially be a
16 targeted method of reducing budgets. We recommended that the Plan include
17 language that provides a roadmap for shifting to an all-electric New Construction
18 program, including a clear and defined path that starts in 2026. We also
19 recommended that RIE phase out or reduce incentives for homes using fossil fuels
20 for space and water heating.

21
22 RIE did acknowledge the comments it received related to a shift to an all-electric
23 New Construction program, but was not responsive to our recommendation to
24 commit to developing a path to all-electric programs. We remain concerned that
25 RIE's approach seems to be a wait and see one, which risks putting the programs
26 in a reactionary position if or when limitations are placed on gas new
27 construction.

28

29 **Q: What comments did you provide related to code adoption and how did RIE**
30 **address the comments and recommendations you provided?**

1 A: With the adoption of IECC 2024 in Rhode Island, we were surprised to see no
2 changes in program narrative or implementation plans when we reviewed the first
3 draft of the plan. We recommended that RIE include language that discusses the
4 impact of IECC 2024 code adoption on the new construction program, including
5 at minimum considerations around measures and claimable savings that are
6 impacted. We also recommended that RIE reintroduce and update, as necessary,
7 language that was in 2025 Plan around monitoring and preparing for IECC code
8 adoption and preparing the market to move to net zero energy as the construction
9 standard in Rhode Island.

10

11 RIE was partially responsive to our recommendations. RIE did include language
12 in the Main Text that signals to readers that the RI TRM incorporates changes due
13 to 2024 IECC, but this does not respond to the recommendation for discussion on
14 those changes in the New Construction program narrative and does not discuss
15 impact of these changes on claimable savings. And while some of the language
16 added around the IECC changes partially addresses our recommendations, it does
17 not address language that was removed from what was included in the 2025 plan
18 about preparing the market for a move to net zero energy as the construction
19 standard in Rhode Island.

20

21 **V.iii. FEEDBACK ON PLAN NARRATIVE (EVALUATION, MEASUREMENT,**
22 **AND VERIFICATION)**

23

24 **Q: What comments did you provide related to planned evaluation studies**
25 **proposed in 2026 and how did RIE address the comments and**
26 **recommendations you provided?**

27 A: Given the potential concerns around program budgets, it is critical to ensure that
28 evaluation studies planned for 2026 are of the highest and best use of funds. We
29 recommended that RIE document in the EM&V plan the process RIE took for
30 selecting the studies it is planning on conducting in 2026, including a list of
31 studies it would like to conduct but has left out of the plan for budgetary reasons.

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The filed plan is responsive to our recommendation to describe the process RIE took for selecting the studies it plans to conduct in 2026. Because the resulting list of planned studies is noted as “preliminary” and that they “will likely reduce the number and/or scope of studies listed”, we can not fully assess responsiveness to our recommendation for the EM&V plan to include a list of studies it would like to conduct but is not for budgetary reasons. As noted in the EM&V plan, we work closely with RIE and its vendors on the evaluation process and will continue to monitor the list of studies to be conducted in 2026.

Q: What comments did you provide related to application of recent evaluation study findings and how did RIE address the comments and recommendations you provided?

A: The Plan does highlight recent evaluation study findings, but could benefit from more detail around specific recommendations from each study completed in the past calendar year or two, how recommendations are (or are not) being adopted by RIE and why. This is done to some extent, but could be improved to better connect recommendations – particularly those that are more process oriented (i.e. not savings impacts) – to program design. We recommended that for each study completed in 2024 and 2025, RIE include a table or summary that documents all recommendations made by each study completed, include a detailed description of how RIE is addressing the recommendations, where not addressing a recommendation include a description of why, and where adopting a recommendation, include a specific description of how it is being addressed.

RIE has largely been responsive to this recommendation. The plan now includes for each study completed in 2025 the following: a summary of the objective and high-level findings of the study, a description of which programs the results apply to, evaluation recommendations from the study, and an explanation of whether or not RIE adopted the recommendations from the study.

1 **VI. SUMMARY**

2

3 **Q: Please summarize the testimony you have provided.**

4 A: In this testimony, I have outlined the Council's engagement in the development of
5 RIE's 2026 Plan, including its review process, comments, and recommendations.
6 I described the Council's proposal for additional savings and associated budget
7 impacts, highlighted follow-ups from the 2025 docket, and addressed key
8 priorities such as cost-effectiveness, equity, and alignment with state climate
9 policy. I also provided an assessment of RIE's responsiveness to our feedback and
10 identified areas for improvement in program design, transparency, and long-term
11 planning. Overall, this testimony reflects the Council's commitment to ensuring
12 that the 2026 Plan delivers meaningful energy savings, supports affordability, and
13 advances Rhode Island's clean energy and equity objectives.

14

15 **Q: Does this conclude your testimony?**

16 A: It does.