

# MEMO

## CONSULTANT TEAM

**TO:** Rhode Island Energy  
**FROM:** EEC Consultant Team  
**CC:** Energy Efficiency Council, Office of Energy Resources  
**DATE:** April 30, 2026  
**RE:** Consultant Team Comments on 2027-2029 Energy Efficiency Plan Memorandum and Outline



### INTRODUCTION

The Energy Efficiency Council’s Consultant Team (C-Team) appreciates the opportunity to provide comments on Rhode Island Energy’s 2027–2029 Energy Efficiency Plan (“the Plan”) Memorandum and Outline (“the Plan Outline Memo”). We appreciate Rhode Island Energy’s (“the Company”) efforts to engage stakeholders early in the development of the first binding three-year energy efficiency plan and recognize the complexity of planning in a period marked by affordability concerns, evolving policy direction, and rapid technological change.

Given the significance of this planning cycle, we view the Plan as both a substantive investment plan and a foundational framework that will shape future multi-year planning efforts in Rhode Island. As such, clarity around strategic intent, implementation pathways, and accountability mechanisms will be especially important—not only for program delivery over the next three years, but also for establishing confidence in the transition from annual to binding multi-year planning.

The comments that follow are organized around several cross-cutting themes that we believe warrant particular attention as the Plan moves from outline to draft.<sup>1</sup> These include:

- (1) Affordability value, and the role of energy efficiency;
- (2) Energy efficiency as a grid and system resource;
- (3) Data, Advanced Metering Infrastructure, and a clear implementation roadmap;
- (4) Equity, participation metrics, and accountability;
- (5) Customer experience and program entry points;
- (6) Residential and income eligible programs;
- (7) Commercial and industrial programs; and
- (8) Policy alignment and planning context

Our intent is not to prescribe detailed program designs at this stage, but rather to highlight areas where additional specificity, clearer roadmaps, or stronger linkages between analysis, strategy, and implementation would materially strengthen the Plan. We offer these comments constructively and in the spirit of collaboration, with the goal of helping ensure that the Plan delivers durable value to customers, supports Rhode Island’s broader policy objectives, and establishes a strong precedent for future three-year plans.

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<sup>1</sup> We are also submitting a marked-up version of the Plan Outline Memo reflecting detailed, section-specific comments. That markup is provided to complement this memo and to facilitate efficient review of our feedback.

## **AFFORDABILITY, VALUE, AND THE ROLE OF ENERGY EFFICIENCY**

We support the Plan’s emphasis on affordability and cost-effectiveness and agree that demonstrating the value of energy efficiency to customers, regulators, and policymakers will be essential in the 2027–2029 period. We note, however, that affordability is not only a customer and regulatory concern, but also a core priority of the Council. We recommend that the Plan explicitly reflect this shared focus.

Relatedly, we encourage the Company to clearly define what is meant by “value” throughout the Plan. Value can encompass multiple dimensions, including customer bill savings, lifecycle cost savings, system benefits (such as avoided infrastructure and improved reliability), emissions reductions, non-energy benefits, and broader economic impacts. Clarifying how these different elements of value are considered—and how tradeoffs are evaluated—would strengthen the Plan’s strategic foundation.

We also strongly recommend revisiting the methodology used to calculate and present bill impacts. Given the increasing reliance on bill impacts as a metric for determining investment levels, it is critical that these estimates are accurate, comprehensive, and accompanied by clear explanations of assumptions and limitations.

## **ENERGY EFFICIENCY AS A GRID AND SYSTEM RESOURCE**

We encourage the Plan to explicitly articulate the role of energy efficiency as a system and grid resource, in addition to its role in delivering customer-level bill savings. Energy efficiency can contribute meaningfully to load management, non-wires alternatives, infrastructure deferral, and long-term system planning. Clear articulation of this role would help situate efficiency investments within a broader least-cost system strategy and clarify how energy efficiency interacts with demand response, system reliability planning, and future grid needs.

## **DATA, AMI, AND A CLEAR IMPLEMENTATION ROADMAP**

We support the Plan’s recognition of Advanced Metering Infrastructure (AMI) as a potentially transformative capability. Given that AMI has been approved by the Commission as a long-lived platform investment, we believe it is reasonable to expect the Plan to include at least a high-level roadmap describing how AMI capabilities in the context of energy efficiency programs will evolve over time—from evaluation-focused applications to active program design, targeting, and procurement.

More broadly, we recommend that the Company to supplement discussions of AMI, market transformation initiatives, demonstrations, pilots, and assessments with clearer implementation pathways. At this stage, many strategies are presented at a conceptual level. As the Plan develops, stakeholders will benefit from:

- Greater clarity on timelines and sequencing;
- Clear decision points for moving from exploration to execution; and
- Guardrails to ensure that research and pilots meaningfully inform program design

We also encourage explicit discussion of load disaggregation, where appropriate, as a valuable tool for customer targeting and engagement—particularly in multifamily and small business segments.

## **EQUITY, PARTICIPATION METRICS, AND ACCOUNTABILITY**

We appreciate the continued emphasis on equitable participation and agree that measurable progress is essential. At the same time, we note that current participation metrics—particularly those focused solely on participant counts—are insufficient to fully evaluate progress.

For example, tracking the number of small business participants inside and outside of Environmental Justice communities does not adequately capture the total eligible market in these communities or whether participation gaps are narrowing over time. We recommend that the Plan:

- Clearly define the denominator (i.e., eligible accounts) when evaluating participation;
- Track progress over time, not just annually; and
- Distinguish between outcomes driven by specific interventions (e.g., partnerships with CommerceRI) and broader market trends.

We also recommend clearer integration of EM&V findings into program improvement commitments. Strengthening the feedback loop between evaluation results and program design—particularly within a multiyear planning framework—will be essential to accountability and continuous improvement.

## **CUSTOMER EXPERIENCE AND PROGRAM ENTRY POINTS**

We strongly support the Plan’s focus on improving customer experience and reducing friction. We believe there are two particularly important points that warrant greater emphasis:

- The Energy Efficiency website, which should serve as a clear, intuitive front door for customers navigating multiple programs and incentives.
- Proactive engagement with customers experiencing high or volatile bills, recognizing that energy efficiency is one of the most immediate tools available to help manage energy costs.

Additionally, given the growing number of state, utility, and federally funded energy programs, we also encourage the Company to explore more customer-centered navigation approaches that help participants—especially those historically underserved communities—identify the most appropriate combination of services and incentives.

## **RESIDENTIAL & INCOME ELIGIBLE PROGRAMS**

We would suggest that the Company further support or refine statements suggesting that the pool of weatherization opportunities is “declining due to market maturity.” While many homes have been previously served, prior participation does not necessarily imply comprehensive or optimized treatment, nor does it account for persistent access barriers affecting renters, multifamily buildings, low-income households, and homes with unresolved weatherization barriers.

Additional analysis clarifying where and to what extent weatherization markets may reasonably be considered mature—and where access and delivery challenges remain—would help inform appropriate program design and investment levels.

We also note the absence of discussion regarding the future of behavioral or Home Energy Report-type programs in the residential and income-eligible portfolio and expect the Plan will provide clarification on whether and how these offerings are expected to evolve over the 2027–2029 period.

We also would like to see clarification on how proposed data initiatives—such as multifamily databases or benchmarking efforts—build upon prior studies and datasets, and what incremental value new investments are intended to deliver.

## **COMMERCIAL & INDUSTRIAL PROGRAMS**

We agree with the emphasis on controls, optimization, and analytics in the C&I portfolio and strongly recommend that the Plan more explicitly integrate existing building commissioning (EBCx). Recent evaluation findings indicate that current EBCx-type offerings would benefit from dedicated program management and implementation oversight. We recommend planning for a comprehensive EBCx offering within this Plan, with procurement and design potentially occurring in mid-to-late 2026 and full implementation by mid-2027.

## **POLICY ALIGNMENT AND PLANNING CONTEXT**

Finally, we note that several important policy initiatives—such as Act on Climate, the Climate Action Plan, and the Future of Gas proceedings—are largely absent from the Plan Outline Memo. We expect these to receive appropriate attention in the full Plan, given their implications for long-term resource planning, emissions reduction strategies, and program prioritization.

We also encourage acknowledgment that this first binding three-year Plan is being developed on a more constrained timeline than future plans are expected to follow, and that some flexibility may be warranted to account for this transition.

## **SUMMARY**

We appreciate Rhode Island Energy’s early engagement with stakeholders and the opportunity to provide input on the Plan Outline Memo. The issues raised in our comments reflect both the importance of this first binding three-year plan and the opportunity it presents to strengthen strategic alignment, transparency, and implementation outcomes across the energy efficiency portfolio.

As the Plan advances from outline to draft, we recommend that the Company to focus on clearly linking analysis, strategy, and execution—particularly where the Plan introduces new approaches related to data utilization, market transformation, equity measurement, and system-level value. Providing clearer definitions, implementation roadmaps, and accountability mechanisms will be critical to building shared confidence in how the Plan will function over a multi-year horizon and adapt as conditions evolve.

We also view the 2027–2029 Plan as a foundational step in a longer-term transition to multi-year planning in Rhode Island. Decisions made in this cycle—regarding planning structures, feedback loops between EM&V and program design, and the role of energy efficiency within broader system planning—are likely to influence not only near-term program performance, but also stakeholder expectations and regulatory standards for future plans. Recognizing this context, we believe it is particularly important

that the Plan be explicit about assumptions, constraints, tradeoffs, and areas where additional refinement is anticipated over time.

We look forward to continued collaboration with the Company and other stakeholders as the Plan is further developed. We appreciate the openness to feedback reflected in this early engagement process and hope that the perspectives offered here—and in our accompanying markup of the Plan Outline Memo—are helpful in development of the first draft of the 2027–2029 Energy Efficiency Plan.

As always, please do not hesitate to reach out if follow-up discussion or clarification would be useful as this work progresses.