

Rhode Island Energy 2024 Energy Efficiency Plan

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Pre-Filed Testimony

Consistent with the revised Least Cost Procurement Standards (“LCP Standards” or “Standards”) approved by the Rhode Island Public Utilities Commission (PUC) in Docket 23-07-EE1, the Company will include pre-filed testimony with the 2024 Annual Plan that the Plan is compliant with the LCP Standards.

Section One: Introduction

1.1 Executive Summary

Pursuant to Rhode Island General Statute § 39-1-27.7, the *Comprehensive Energy Conservation, Efficiency and Affordability Act of 2006*,² the Narragansett Electric Company d/b/a Rhode Island Energy (RI Energy or Company) hereby submits its 2024 Annual Energy Efficiency and Conservation Procurement Plan (Annual Plan or 2024 Plan). This is the first annual plan of three submitted within the sixth triennial plan, the 2024-2026 Three-Year Energy Efficiency and Conservation Procurement Plan³ (2024-2026 Plan).

Energy efficiency is the most cost-effective approach to lower energy costs, increase grid reliability, and protect the environment through the reduction of carbon and other air pollutant emissions. Customers who directly participate in the Company’s energy efficiency programs save energy and lower their energy bills. Non-program participants also benefit as energy efficiency reduces peak demand and lowers long-term base load, reducing the need for investments in distribution, generation, and transmission infrastructure.

¹ State of Rhode Island Public Utilities Commission, [Least Cost Procurement Standards](#).

² Rhode Island General Law, [Comprehensive Energy Conservation, Efficiency, and Affordability Act of 2006](#), RIGL § 39-1-27.7.

³ 2024-2026 Plan (filed Oct. 1, 2023).

The Company's energy efficiency programs are a cost-effective method of contributing to mitigating climate change and contributing to state and federal mandates for greenhouse gas emission reductions. Efficiency programs reduce carbon dioxide and other greenhouse gas emissions, such as nitrous oxides, sulfur oxides and chlorofluorocarbons (from refrigerants). On April 14, 2021, Governor Dan McKee signed into law the 2021 Act on Climate⁴, legislation which set forth enforceable statewide, economy-wide greenhouse gas emission reduction mandates. The legislation requires Rhode Island to reduce greenhouse gas emissions by 45 percent below 1990 levels by 2030, 80 percent by 2040, and achieve net-zero emissions by 2050. Energy efficiency in buildings is a key strategy to achieving the legislation's mandates of reducing greenhouse gas emissions in the state and the Company plans to pursue a number of decarbonization strategies including weatherization and the installation of efficient heating, cooling and hot water systems.⁵

To develop the Annual Plan and its associated binding savings goals and budgets, the Company worked closely with the Energy Efficiency & Resource Management Council (EERMC) and its consulting team, the Office of Energy Resources (OER), the Division of Public Utilities and Carriers (the Division), Energy Efficiency Technical Working Group (EE TWG) stakeholders, [the Energy Efficiency Equity Working Group \(EE EWG\)](#), and the Company's vendors. Additionally, the Company solicited residential, income-eligible, and commercial and industrial (C&I) customer feedback from the listening sessions hosted by the Company.⁶ The [Energy Efficiency Equity Working Group's \(EE EWG's\)](#) report recommendations and ongoing work to increase outreach and participation equitably in the state also influenced the design and implementation of the 2024 Plan [as well](#).

The 2024 Plan is a **\$131.5** million investment in helping Rhode Island customers save energy and money.⁷ This investment is expected to save 6,535,414 net lifetime MMBtu (one million British thermal units) and 665,041 net

Commented [SR1]: RE: The footnote, is this referring to the 2025 Climate Strategy, or other proceedings? If other, please clarify what proceedings and when you expect that guidance. The 2025 Climate Strategy will not be final in time to inform 2024-2026 plans.

Commented [RIE1R2]: To be addressed

Commented [CJ2]: What about the Customer Feedback Activities that the Company conducted over the Summer? There is zero mention of those in the Main Text, Residential, or C&I Attachments, nor is there a final report out included as an attachment as has been the case in years past where the Company conducted dedicated customer feedback activities.

Commented [TE2R2]: Added information on listening sessions to 3 year plan.

Commented [SR3]: This is a significant YoY reduction, right? Why?

Commented [BE3R2]: ConnectedSolutions is no longer included in this budget as it has been in previous years.

⁴ Rhode Island General Law, [2021 Act on Climate](#), RIGL §42-6.2.

⁵ The Company is waiting on clarification from related [2021 Act on Climate](#) and Executive Climate Change Coordinating Council (EC4) strategy proceedings to determine if there are program changes needed for the 2024-2026 term. Any necessary changes will be reflected in subsequent annual plans as the 2025 Climate Strategy will not be available ahead of the Oct. 1, 2023 filing deadline for the 2024 Plan and 2024-2026 Plan.

⁶ See Attachment 5 of the 2024-2026 Plan for a detailed overview of the three listening sessions held in June 2023 with residential, income-eligible and C&I customers. Additionally, the 2024-2026 Plan references (when applicable) where customer feedback was integrated into the Company's overall strategies and vision for the 2024-2026 term.

⁷ This number includes performance incentives relevant to Electric and Natural Gas Energy Efficiency Programs.

annual MMBtu across all fuels, while reducing annual carbon dioxide emissions by 72,484 short tons.⁸ By calculating the combined energy and non-energy benefits (e.g., other system, societal, environmental, etc.), the state's efficiency investment is expected to generate \$275.8 million in total net benefits.⁹

Rhode Island's efficiency programs support a robust workforce of local and regional vendors, contractors, and suppliers, further driving local economic activity. Highly skilled, diverse, and trained professionals are the key to engaging more customers, driving participation in programs, and increasing energy savings across the Company's energy efficiency programs. Therefore, in 2024, the Company will increase its workforce development to support trainings regarding zero-net energy projects, building operator certification, codes and standards compliance training, heat pump technologies, and weatherization. In 2024, the Company expects federal funding through the Inflation Reduction Act¹⁰ (IRA) will increase the demand for energy efficiency. To meet this demand, the Company will need to help expand the current efficiency workforce and supply chain, as well as leverage the knowledge and training opportunities available through trade allies and other industry experts.

The Company is focused on developing an equity-driven framework for its energy efficiency programs. For all market sectors, the Company plans to allocate program budgets to increase marketing to underserved populations. RI Energy has developed a community-based organization outreach effort to provide support to this priority. This effort is further detailed in Attachment 8 of this 2024 Plan. If approved, the Company would work with the EWG to design this offering.

The Company remains focused on delivering cost-effective programs and strategies that provide sustainable energy solutions. RI Energy continuously evaluates customer needs and market dynamics to determine if program enhancements and adjustments are warranted and to drive market transformation across multiple end uses, building types and market sectors. This requires flexibility in program planning so the Company can develop and evolve program design and efficacy as needed.

⁸ The electric, gas, and delivered fuel energy efficiency measures proposed in the 2024 Plan will avoid over 72,976,484 short tons of carbon dioxide in 2024 (annual) and lifetime carbon dioxide emissions over XX,XXX short tons. The avoided carbon emissions from the subset of energy efficiency measures in the 2024 Plan that will continue to be in service in 2030. The 2024 Plan's lifetime savings will contribute toward the 2021 Act on Climate's greenhouse gas emission reduction requirements of 45 percent below 1990 levels by 2030.

⁹ Total benefits do not include quantified economic impacts.

¹⁰ H.R.5376, Inflation Reduction Act of 2022 (Aug.16, 2022).

Commented [SR4]: First-year emissions reductions in 2024 do not contribute toward savings targets denominated in 2030 emissions. Only the portion of those measures from 2024 still saving energy in 2030 would contribute. It will be very important to project out the total in-year carbon reductions from this plan (and ideally future and past plans) to understand what EE's cumulative contribution in 2030 will be.

Commented [MOC[E4R2]: The footnote has been updated to state that a subset of the estimated annual carbon emissions achieved by the plan will contribute to 2030 emissions reduction levels. The broader effort of accounting all EE plans' contributions to Act on Climate goals will be a separate effort.

Commented [SR5]: So the BCR is >4.0? Why are we not investing more if that is the case?

Commented [MOC[E5R2]: I changed this value to exclude economic benefits and added a footnote noting as much. This number is now consistent with what is stated in Section 1.2. (... [1])

Commented [SR6]: I would love to see a stronger commitment to capitalizing on, and sustaining, the surge in interest IRA has (... [2])

Commented [TE6R2]: Thank you. Would be interested to hear thoughts on how to do this.

Commented [ML7]: Please use an alternative term or terms, such as underserved. See this: <https://uprising.org.uk/news/> (... [3])

Commented [CJ7R2]: And please ensure consistency with terminology throughout ALL attachments of the plan.

Commented [RIE7R3]: Updated.

Commented [CJ8]: I noted this in the Resi attachment, but noting here as well for consistency. The use of "pilot" doesn't (... [4])

Commented [RIE8R2]: Noted

Commented [RIE9]: Steven Chybowski: I understand that this may still be under development, but if it is possible to have a (... [5])

Commented [TE9R2]: Has been added to Attachment 8.

Commented [MH10]: Agree with other commenters that these type of statements about ideas or considerations in passive (... [6])

Commented [RIE10R2]: Noted

Commented [ML11]: Please turn this into a commitment, perhaps even a full offer

Commented [TE11R2]: Please see Attachment 8.

Commented [SR12]: A qualitative increase in marketing effort and maybe a small pilot are not adequate equity commitment (... [7])

Commented [TE12R2]: Please see sections 2.5.1 and 2.7 for more details on equity efforts.

Commented [SR13]: I don't understand the practical impact of this language. Are you requesting additional flexibility beyond (... [9])

Commented [RIE13R2]: Flexibility within program planning will allow the program to stay effective given changes within (... [8])

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As federal funding for energy efficiency projects flows to state energy offices, it is critical that the Company's energy efficiency programs equitably serve all customers and align with the Justice40 Initiative.¹¹ This federal initiative mandates that a minimum of 40 percent of the overall benefits of federal investments must flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. RI Energy will look to align its programs with the Justice40 Initiative to ensure underserved Rhode Island communities are able to access and benefit from both federal funding and the Company's energy efficiency programs.

In 2024, the Company will look to leverage federal funding through IRA to support and complement existing efficiency efforts. This additional funding will allow RI Energy to serve more customers, address weatherization and other participation barriers, and help incentivize the decarbonization of buildings' heating, cooling and hot water systems.

The remainder of Section One describes the 2024 Plan's associated energy savings and benefits, program planning process, and stakeholder engagement. This section also provides an overview of the Company's proposed programs for the Residential, Income Eligible and C&I sectors, program costs and a funding plan. Additionally, this section describes how the 2024 Plan is responsive to legal mandates and regulatory requirements and delineates the regulatory rulings requested. For further details regarding the Company's 2024 Plan and the Residential, Income Eligible and C&I programs, please see the applicable Attachment.

1.2 Plan Summary

1.2.1 Savings

The primary goal of the 2024 Plan is to create energy and economic cost savings for Rhode Island consumers through energy efficiency. The Electric Portfolio will save 733,832 lifetime megawatt-hours (MWh) over the lifetime of the installed energy efficiency measures 95,193 net annual MWhs, and 12,971 net annual summer kilowatts (kW) and 15,303 net winter kW from passive energy efficiency. The Natural Gas Portfolio will save 3,289,038 lifetime MMBtu over the lifetime of installed natural gas measures and 312,846 annual MMBtu. For all fuels combined (electric, gas, oil, propane), the Annual Plan will save 6,535,414 net lifetime MMBtu and 665,041 net annual MMBtu. Energy savings are measured and verified by third-party evaluation firms.

Commented [RF14]: What can RIE do to help maximize and secure these funds?

Commented [RIE14R2]: RIE is not the first point of contact for federal funds

Commented [ML15]: What are examples of how this alignment will be achieved?

Commented [CJ15R2]: Please add detail here and throughout where appropriate. This is information that will be helpful to anyone reviewing this plan.

Commented [TE15R3]: Please see section 3.4.6 of 3YP for description of coordination efforts regarding annual plans.

Commented [RF16]: How is RIE planning to make sure this takes place?

Commented [RIE16R2]: To be addressed

Commented [RIE17]: Samuel Ross: What evidence is this claim based on? what economic uncertainty is present right now? Arguably inflation could incent making investments today before prices rise, and reducing future energy consumption will save more \$ if energy costs rise too. This is not a clear-cut reality that is well-established, so I would push back on characterizing the market as subject to this type of headwind. Huge federal investment and a critical state climate goal are powerful forces driving toward more investment and public engagement here, not less.

Commented [TE17R2]: Removed.

Commented [SR18]: This statement and the following sentences suggest the company is ramping down ratepayer collections due to the presence of federal dollars. Isn't that in opposition to guidance received from the state and federal levels on how to incorporate IRA funds into existing efforts?

Commented [SR18R2]: This is not a principle that is present in LCP or has been supported in past program cycles. There is ... [10]

Commented [RIE18R3]: To be addressed

Commented [SR19]: How many more customers are e ... [12]

Commented [TE19R2]: Can't offer a firm quantitative ... [11]

Commented [SR20]: What is the funding level dedicat ... [14]

Commented [TE20R2]: In preliminary conversations v ... [13]

Commented [GR21]: Other end uses? Clothes dryers a ... [17]

Commented [TE21R2]: Though not specifically menti ... [16]

Commented [SR22]: Will RIE directly incentivize these ... [15]

Commented [TE22R2]: RI Energy will coordinate with ... [18]

Commented [SR23]: Does the plan describe this anyw ... [20]

Commented [TE23R2]: Decided against substantive c ... [19]

Commented [SR24]: This text is a bit confusing. Isn't t ... [21]

Commented [RIE24R2]: To be addressed

Commented [SR25]: How do you know the exact valu ... [22]

Commented [RIE25R2]: Model was shared

¹¹ The [Justice40 Initiative](#) was established by President Joseph Biden's [Executive Order 14008](#) issued Jan. 27, 2021.

1.2.2 Benefits

The 2024 Plan will create significant benefits for Rhode Island’s residential, commercial, industrial, and income eligible customers. In total, the Annual Plan is expected to create ~~\$275.8559.5~~ million in total benefits over the life of the installed electric and natural gas energy efficiency measures.¹² Of these total benefits, ~~\$195.7409.7 M~~ (\$168.4 M Rhode Island only benefits) million come from electric efficiency and passive demand reductions, and ~~\$80.1149.8 million M~~ (\$79.8 M Rhode Island only benefits) in benefits derive from natural gas efficiency. ~~Table 1~~ ~~Table 1~~ includes a high-level summary of the electric-funded and natural gas-funded portions of the Annual Plan. Each \$1 spent on the Electric Portfolio will create \$1.70 in benefits ~~(\$1.47 in Rhode Island only benefits)~~ over the lifetime of the investment, and every \$1 spent on the Natural Gas Portfolio will create \$1.92 in benefits ~~(\$1.91 in Rhode Island only benefits)~~ over the lifetime of the investments. A detailed summary of the benefits and costs included in the Rhode Island Test (RI Test) are included in Attachment 4.

Commented [SR26]: This is a very different value than listed in the first section, which was over \$600M

Commented [MOC(E26R2)]: Updated to exclude economic benefits, per footnote stating that economic impacts are not included in these numbers.

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1.2.3 Economic Impacts

The Company expects that investments made in energy efficiency under this Annual Plan will add \$236.1 million to Rhode Island’s Gross State Product (GSP), the equivalent of 2,395 job years.¹³ The vast majority of jobs associated with the Annual Plan’s energy efficiency investments are local because they are tied to the installation of equipment and materials. An analysis of RI Energy’s 2022 Energy Efficiency Portfolio found that 73 percent of vendors who deliver services on behalf of the Company’s programs are either headquartered or have a presence in Rhode Island.¹⁴ Investments in energy efficiency contribute to Rhode Island’s economy overall and benefit business owners and their employees who deliver these programs and services. As described in Attachment 4, the calculation of the RI Test

Commented [GR27]: So delivered fuel benefits are included per the RI test. Does more need to be said in this chapter to define the extent of electric program activities and the full extent of electric portfolio savings and benefits?

Commented [TE27R2]: We would welcome feedback on which specifics you’d like to see and they how providing them here would enhance the plan.

Commented [JG28]: Added up electric and gas job years to get 3,316 job years total (2837 electric, 479 gas)

Commented [CJ28R2]: Numbers referenced came from BC Model. Please ensure that final values in Electric and Gas tables are in alignment with BC Model and Main Text.

Commented [RIE28R3]: Noted

¹² Total benefits do not include quantified economic impacts.

¹³ Macroeconomic multipliers for the economic growth and job creation benefits of investing in cost-effective energy efficiency from “Economic Multipliers Update” filed in Docket 5189 on Jan. 6, 2022. This is a correction to the multipliers in “Review of RI Test and Proposed Methodology” prepared for National Grid by the Brattle Group, Jan. 31, 2019. These macroeconomic multipliers reflect the total impact to the Rhode Island economy and do not remove benefits counted elsewhere in the RI Test, so are shown as a separate economic impact analysis estimate.

¹⁴ Guidehouse, “Rhode Island 2022 Energy Efficiency Workforce Analysis Report,” Jun. 1, 2023 (filed as Attachment 5 of Rhode Island Energy’s 2022 Energy Efficiency Year-End Report).

benefits excludes any monetized value of economic impacts because of concerns over double counting of benefits with other categories.

1.2.4 Environmental Benefits

The electric, gas, and delivered fuel energy efficiency measures proposed in this Annual Plan will avoid over 72,484 short tons of carbon in 2024,¹⁵ which contributes toward the Act on Climate's greenhouse gas emission reduction requirement of 45 percent below 1990 levels by 2030, and towards the legislation's greenhouse gas emission requirement of net-zero by 2050.¹⁶ The Company believes that robust, ambitious energy efficiency programs should be a foundational element of achieving greenhouse gas emission reduction targets. The Company also supports the various efforts that holistically evaluate the least cost pathways to realizing economy wide emissions.

1.2.5 Budgets and Funding

This Plan includes an investment of \$96.6 million in the cost-effective Electric Portfolio in 2024.¹⁷ If approved, this will be funded by \$11.5 million in proceeds from the ISO New England (ISO-NE) Forward Capacity Market (FCM), revenues from the existing energy efficiency program charge of \$0.0096 per kWh, and accounting for a fully reconciling mechanism of \$0.00091 per kWh pursuant to R.I. Gen. Laws § 39-1-27.7(c)(5) to fully fund the cost-effective Electric Portfolio for the 2024 program year for a total charge of \$0.01051 per kWh.^{18,19}

This Plan also includes an investment of \$34.9 million in the cost-effective Natural Gas Portfolio in 2024.²⁰ If approved, this investment will be funded by revenues from the existing energy efficiency program charge of \$1.136 per dekatherm for residential customers and \$0.620 per dekatherm for non-residential customers, and accounting for a

¹⁵ While all energy savings seen in the Annual Plan are net, these emissions are calculated based on gross energy savings from energy efficiency measures. The marginal carbon emission rates are from the Synapse Energy Economics, Inc., "[Avoided Energy Supply Components in New England: 2021 Report](#)," Appendix G, based on US Energy Information Agency (EIA) data.

¹⁶ Rhode Island General Law, [2021 Act on Climate](#), RIGL §42-6.2.

¹⁷ This number includes performance incentives relevant to Electric Portfolio programs.

¹⁸ See Attachment 5: Electric Energy Efficiency Program Tables, Table E-1 for a list of funding sources and calculation of the charge.

¹⁹ In 2024, no new Regional Greenhous Gas Initiative (RGGI) funds will be available for efficiency programming. RI Energy will identify residual funds.

²⁰ This number includes performance incentives relevant to Natural Gas Portfolio programs.

Commented [SR29]: I would like to continue to make the point that it would be a better implementation of the spirit of the RI test to agree on a sufficiently conservative value for economic development benefits that all parties would be comfortable adding that value to the other benefits in the test (i.e. establish a value that is low enough to eliminate concerns about double-counting. This could potentially include something as aggressive as directly subtracting the total value of the possibly-double-counted categories from the overall economic benefits). This could be done in addition to estimating the full non-additive economic benefits as currently done. The concern that exists with the current approach is that, when the RI test results are viewed alone, the economic development benefits, which are known to be sizeable, are in effect equal to zero. A conservative but positive value that can be directly included in the RI test would be an improvement, though an imperfect one.

Commented [ME29R2]: In discussions between Brattle and Synapse regarding economic impacts, both groups felt most comfortable presenting RI Test results and economic impact analysis results separately to avoid any concern of double counting. Brattle did provide the Company with a proposed method of adding economic benefits without double-counting. When presented with an overview of this proposed method, Synapse responded that they still had double counting concerns that they would want to discuss. The Company ultimately decided to not pursue adding economic benefits to the RI Test for the 2024 plan because a) a clear method of avoiding double counting had not yet been agreed upon, b) all programs currently show RI Test BC ratios above one with economic impacts excluded, and c) the Docket 4600 guidance gives the PUC the ability to approve proposals that do not pass the RI Test if they are nonetheless found to be beneficial. Therefore, we do not believe that, for the current 2024 Plan, adding economic impacts to the RI Test would alter the design of the planned programs or the PUC's likelihood of approving them.

Commented [SR30]: See note above re: actual impact on goals.

Commented [SR30R2]: Also, it would be good to report both gross and net savings, not just gross.

Commented [RIE30R3]: Noted.

Commented [RIE31]: Steven Chybowski: Agreed

Commented [RIE31R2]: Noted

Commented [RF32]: No mention of additional federal funds, which shouldn't be counted on yet, but should they at least be mentioned as a potential increase in funding that could help... [23]

Commented [TE32R2]: Please see 3YP for discussion of federal funding.

Commented [SR33]: I would like to make sure I understand this language. Splitting the charge into two portions like this is somewhat confusing. Is this stating that there will be a total charge of 0.0096 + 0.00374 in 2024? Or is the fully reconciling mechanism... [24]

Commented [RIE33R2]: Total charge added. Additionally, Tables E-1 and G-1 in Attachments 5 and 6 list the total customer funding required for the electric and gas program portfolios.

fully reconciling mechanism of (\$0.041) per dekatherm for residential customers and \$0.201 per dekatherm for non-residential customers. This is pursuant to R.I. Gen. Laws § 39-1-27.7(c)(5) to fully fund the cost-effective Natural Gas Portfolio for 2024, for a total of \$1.095204 per dekatherm for residential customers and \$0.821915 per dekatherm for non-residential customers.²¹

The cost of procuring 733,832 net lifetime MWh electric energy efficiency savings through the Annual Plan is \$48.75 million less than if that electric load was met by purchasing additional electric supply. The cost of procuring said MWh savings is \$21.42 million less than the cost of supply if only Rhode Island intrastate electric benefits are counted. The cost of procuring 3,289,038 MMBtu lifetime natural gas energy efficiency savings through the Plan is \$10.09-9 million less than if that natural gas load was met by purchasing additional natural gas supply.²² The cost of procuring said MMBtu savings is \$9.76 million less than the cost of supply if only Rhode Island intrastate natural gas benefits are counted.

Table 1. 2024 Energy Efficiency Program Plan Summary

Electric Programs by Sector	Implementation Budget (\$000) ⁽¹⁾	Performance Incentive (\$000)	Customer Contribution (\$000)	Annual Savings (MWh)	Lifetime Savings (MWh)	\$/Lifetime kWh ⁽⁶⁾	Summer Annual Demand Savings (kW) ⁽⁵⁾	Total Benefits (\$000) ⁽⁴⁾	Alternative Benefits (\$000) ⁽³⁾	RI Test B/C Ratio ⁽²⁾	Participants ⁽⁷⁾
Non-Income Eligible Residential	\$29,999	\$538	\$6,478	35,328	188,880	\$0.19	4,279	\$59,987	\$54,320	1.62	324,977
Income Eligible Residential ⁽⁸⁾	\$15,951	\$0	\$0	3,520	56,013	\$0.29	330	\$23,992	\$22,398	1.50	5,976
Commercial and Industrial	\$40,788	\$3,544	\$11,678	56,345	488,939	\$0.11	8,363	\$111,718	\$91,664	1.99	2,559
Regulatory ⁽⁹⁾	\$5,826										
Electric Subtotal	\$92,564	\$4,082	\$26,256	95,193	733,832	\$0.15	12,972	\$195,697	\$168,381	1.70	333,513

²¹ See Attachment 6: Natural Gas Energy Efficiency Program Tables, Table G-1 for list of funding sources and calculation of the charge.

²² For more information on how this was calculated, see section [Error! Reference source not found.7-5](#) of the Main Text, "Cost of Annual Plan Compared to the Cost of Energy Supply".

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Commented [SR34]: Put another way, \$95.2M in electric EE investment is avoiding \$158M in supply costs, right? If yes, this continues to suggest we should pursue more efficiency now, and reduce supply costs for ratepayers even further, especially since there are IRA funds to leverage and a clear need to ramp up certain program activities to position RI for AoC needs - like insulation and air-sealing for gas heated homes, and continued IE weatherization and barrier mitigation

Commented [RIE34R2]: Thanks for noting. The budgets will not be increased at this time.

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Commented [RIE35]: Steven Chybowski: Key point

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The Narragansett Electric Company
d/b/a/ Rhode Island Energy
Docket No. 23-XX-XX
2024 Annual Plan Narrative

Gas Programs by Sector	Implementation Budget (\$000) ⁽¹⁾	Performance Incentive (\$000)	Customer Contribution (\$000)	Annual Savings (MMBtu)	Lifetime Savings (MMBtu)	\$/ Lifetime MMBtu ⁽²⁾	NA	Total Benefits (\$000) ⁽³⁾	Alternative Benefits (\$000) ⁽⁴⁾	RI Test B/C Ratio ⁽⁵⁾	Participants ⁽⁶⁾
Non-Income Eligible Residential	\$15,092	\$0	\$3,276	137,163	1,084,565	\$16.94		\$24,518	\$24,380	1.33	140,993
Income Eligible Residential ⁽⁷⁾	\$7,581	\$0	\$0	16,367	287,482	\$26.37		\$16,904	\$16,859	2.23	3,587
Commercial and Industrial ⁽⁸⁾	\$9,022	\$819	\$3,661	159,317	1,916,991	\$6.62		\$38,684	\$38,575	2.87	765
Regulatory ⁽⁹⁾	\$2,361										
Gas Subtotal	\$34,055	\$819	\$6,937	312,846	3,289,038	\$12.46		\$80,106	\$79,814	1.92	145,345
TOTAL Combined Plan	\$126,619	\$4,901	\$33,193	NA	NA	NA	NA	\$275,803	\$248,195	1.81	NA

- (1) In addition to Income Eligible Residential programs, Income Eligible customers can participate in all Non-Income Eligible Residential programs.
(2) Regulatory includes contributions to the Office of Energy Resources, EFERMC and the Rhode Island Infrastructure Bank.
(3) The Program Implementation Budgets come from Tables E-3 and G-3 of Attachment 5 and 6, respectively.
(4) Performance Incentive excluded from denominator, consistent with the Attachment 5 and 6.
(5) The Summer Annual Demand Response (kW) measures passive demand savings.
(6) "Total Benefits" and the "RI Test B/C Ratio" continue to exclude economic benefits from the RI Test as in the 2023 Plan.
(7) The unit measure for participation varies by program. See Attachment 5, Table E-7 and Attachment 6, G-7 for participation goals by program.
(8) Electric Programs are funded by the Electric Energy Efficiency Charge but also include Delivered Fuels energy savings.

	Electric Programs by Sector	Implementation Budget (\$000) ⁽¹⁾	Performance Incentive (\$000)	Customer Contribution (\$000)	Annual Savings (MWh)	Lifetime Savings (MWh)	\$/ Lifetime kWh ⁽²⁾	Summer Annual Demand Savings (kW) ⁽³⁾	Total Benefits (\$000) ⁽⁴⁾	Alternative Benefits (\$000) ⁽⁵⁾	RI Test B/C Ratio ⁽⁶⁾
Non-Income Eligible Residential ⁽⁷⁾	\$29,999	\$531	\$6,478	35,328	188,880	\$0.19	4,269	\$59,987	\$54,320	1.62	224,977
Income Eligible Residential ⁽⁸⁾	\$15,954	\$0	\$0	3,520	56,013	\$0.29	330	\$23,992	\$22,398	1.50	5,976
C&I	\$40,788	\$3,537	\$11,678	56,345	488,939	\$0.11	8,363	\$111,718	\$91,664	1.99	2,559
Regulatory ⁽⁹⁾	\$6,055										
Electric Subtotal	\$92,792	\$4,067	\$26,256	95,193	733,832	\$0.15	12,971	\$195,697	\$168,381	1.70	233,512
Gas Programs by Sector	Implementation Budget (\$000) ⁽¹⁾	Performance Incentive (\$000)	Customer Contribution (\$000)	Annual Savings (MMBtu)	Lifetime Savings (MMBtu)	\$/ Lifetime MMBtu ⁽²⁾	NA	Total Benefits (\$000) ⁽³⁾	Alternative Benefits (\$000) ⁽⁴⁾	RI Test B/C Ratio ⁽⁵⁾	Participants ⁽⁶⁾
Non-Income	\$15,092	\$0	\$3,276	137,163	1,084,565	\$16.94		\$24,518	\$24,380	1.33	140,993

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Eligible Residential													
Income Eligible Residential (4)	\$7,581	\$0	\$0	16,367	287,482	\$26.37		\$16,904	\$16,859	2.23	3,587		
C&I	\$9,022	\$814	\$2,661	159,317	1,916,991	\$6.62		\$38,684	\$38,575	2.87	765		
Regulatory (2)	\$2,505												
Gas Subtotal	\$34,199	\$814	\$6,937	312,846	3,289,038	\$12.51		\$80,106	\$79,814	1.91	145,345		
TOTAL Combined Plan	\$126,991	\$4,881	\$33,193	NA	NA	NA	NA	\$275,803	\$248,195	1.81	N/A		
(1) In addition to Income Eligible Residential programs, income eligible customers can participate in all Non-Income Eligible Residential programs--													
(2) Regulatory includes contributions to the Office of Energy Resources, EERMC and the Rhode Island Infrastructure Bank--													
(3) The Program Implementation Budgets come from Tables E-3 and G-3 of Attachment 5 and 6, respectively--													
(4) Performance Incentive excluded from denominator, consistent with the Attachment 5 and 6--													
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(7) The unit measure for participation varies by program. See Attachment 5, Table E-7 and Attachment 6, G-7 for participation goals by program--													
(8) Electric Programs are funded by the Electric Energy Efficiency Charge but also include Delivered Fuels energy savings--													

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1.3 The Planning Process

This 2024 Plan benefited from the process undertaken in the 2023 calendar year that resulted in the 2024-2026 Plan and reflects a refinement of the planning that was undertaken for the first year of the 2024-2026 Plan, including incorporating the latest Evaluation, Measurement, and Verification (EM&V) studies and Avoided Cost study (see Attachment 3 for the latest studies applied). The 2024-2026 Plan was informed by the areas of opportunity identified in the Rhode Island Energy Efficiency Market Potential Study Refresh (Market Potential Study Refresh) commissioned by the EERMC and completed by Dunsy Energy Consulting in early 2023. This Annual Plan has also been guided by the LCP Standards in RI PUC Docket 23-07-EE. The Standards include an extensive set of "principles of program design" referenced in section [02-2Error! Reference source not found.](#)

Commented [SR36]: Are these specific changes listed anywhere?

Commented [RIE36R2]: Edited

The Company has engaged the EE TWG, EWG, and the EERMC and its consulting team throughout the planning process to leverage their expertise and seek their feedback. The Company is grateful for the substantive critiques and ideas that have come through this process of continued engagement. In particular, the discussions of equity have helped shape and elevate RI Energy's equity commitments, establishing equity as an overarching strategic objective of the 2024 Plan and adding multiple specific, measurable actions across the Company's energy efficiency programs.

Commented [ML37]: Equity Working Group?

Commented [RIE37R2]: Added

1.4 How to Read this Plan

For ease of review, this 2024 Plan has been organized to align with the revised LCP Standards. There are three overarching sections:

- **Strategies and Approaches to Planning.** This section provides discussion of the Company's approach to implementing the principles of program design outlined in the LCP Standards and provides summary program descriptions, along with the major enhancements and innovations planned for 2024. This section also includes a discussion of program participation, EM&V, coordination with other energy programs, and demonstrations, pilots and assessments.
- **Consistency with Standards.** This section explains how the Annual Plan complies with the requirements for cost-effectiveness, reliability, prudence (including a detailed discussion of equity and rate and bill impacts), environmentally responsible, and comparison to alternative cost of supply requirements, as set forth in the LCP Standards.
- **Goals, Budget, and Funding Plan.** This section details these elements and discusses the performance incentive plan and performance metrics.

The eleven Attachments to this Annual Plan provide additional detail on specific Plan elements. **Attachment 1 Residential & IES Programs** and **Attachment 2 C&I Programs** provide detail on program eligibility criteria, offerings, implementation and delivery, customer feedback, 2024 changes with accompanying rationale, and proposed evaluations for each program. **Attachment 3 Evaluation, Measurement, and Verification Plan** reviews evaluation studies completed in 2022, details studies planned for 2024, and provides a recap of historical studies. **Attachment 4 RI Benefit Cost Test** presents the framework for assessing cost-effectiveness of this Annual Plan. **Attachments 5 and 6** contain funding, budgets, goals, and cost-effectiveness tables for the Electric and Natural Gas energy efficiency programs, respectively. **Attachment 7 Rate and Bill Impacts** provides a detailed analysis of the bill impacts resulting from this Plan. **Attachment 8** details, for each sector, **2024 Demonstrations, Pilots and Assessments**. **Attachment 9 Cross-Program Summary** documents how the programs described in this Annual Plan relate to other specific RI Energy programs. **Attachment 10 Definitions** provides definitions of energy efficiency terms used throughout the Annual Plan. **Attachment 11 Equity Working Group Report** provides a summary of actions taken through the EWG.

Commented [SR38]: Looking forward to reviewing this.

Commented [RIE38R2]: Thanks for the comment.

Section Two: Strategies and Approaches to Planning

2.1 Strategic Overview

This Annual Plan is the first year of the 2024-2026 Plan. This 2024 Plan supports continued innovation and accelerates the efficiency of Rhode Island homes and businesses. This Annual Plan achieves savings by implementing the following key strategic priorities set out in the 2024-2026 Plan, modified for the 2024 program year:

- Increased customer outreach to expand participation.
- Targeted, comprehensive efficiency upgrades to ensure customers use program offerings to the fullest extent.
- Enhanced financing options to enable customer investments in efficiency.
- Programs delivered equitably, with the input and guidance of the EWG and other stakeholders.
- Increased workforce capacity to serve customers.

Five Key Priorities



Deliver optimized, tailored programs that serve all customers and **increase program reach**



Understand customer needs, planning cycles, and goals to optimize incorporation of the **next generation of efficiency measures**



Enhance financing options, simplify offerings, and raise customer awareness of complementary funding sources that can be leveraged to **enable customers to invest in efficiency**



Serve customers equitably by designing programs with a conscious effort to serve small business and low- and moderate-income; gender, racially and ethnically diverse; and non-native English-speaking customers



Increase workforce capacity to serve customers and implement energy efficiency

Commented [GR39]: Nothing to be said here about electrification and/or GHG reductions? Yes, coordination with other energy policies and programs is mentioned below

Commented [CJ39R2]: Agree that GHG reductions via responsiveness to Act on Climate should be a strategic priority of the plans.

Commented [BE39R3]: We discuss compliance with Act on Climate in detail in the 3-year and annual plans

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Commented [RIE40]: Samuel Ross: Think this sentence needs revision

Commented [RIE40R2]: See edits

Commented [AC41]: And other affected parties

Commented [RIE41R2]: This section was edited

2.2 Principles of Program Design

This 2024 Plan has been guided by the LCP Standards as updated in RI PUC Docket 23-07-EE, which provides a set of principles of program design. The bullets below summarize the principles and, if appropriate, in what sections of this Annual Plan they are addressed.

- **Integration with other programs and policies.** Section 4: Coordination with Other Energy Policies and Programs provides details on the Annual Plan's connection to specific state policies. Energy Efficiency Program descriptions in Attachments 1 and 2 describe the dissemination of information on energy programs beyond those run directly by the Company.
- **Innovation.** Innovative strategies are outlined in Attachment 8: Demonstrations, Pilots and Assessments.
- **Comprehensiveness.** Examples of strategies to achieve deep comprehensive savings packages that emphasize whole building and whole system solutions are found in the C&I market sector approach and the Residential and Income Eligible whole building delivery program descriptions, in Attachments 2 and 1, respectively.
- **Equity.** Using an equity lens involves consideration of how to modify systemic and institutional structures that have made it easier for some customers to access the energy efficiency programs than others. Sections 2.5.1 and 2.6 describe the Company's approach to equity in 2024.
- **Build on prior plans.** The experience and lessons of prior planning and regulatory approval processes informs the current program design.
- **Build on prior programs.** Programs are continuously evolving, building from one plan year to the next. Each program description in Attachments 1 and 2 has a section addressing program design changes for 2024.
- **Planned based on potential assessments.** This Annual Plan is informed by the 2023 Market Potential Study Refresh, and the areas of opportunity identified within it, as well as the cost implications and approach to barrier mitigation necessary to achieve higher levels of potential savings.
- **Unlock capital and effectively uses funding sources.** This Annual Plan consistently looks beyond direct financial incentives and traditional financing strategies to design capital and program access strategies that respond to specific customer barriers, such as grants for overcoming pre-weatherization barriers, expanded-a revised HEAT Loan or third-party financing.

Commented [AC42]: Good that this is being called out specifically and documented

Commented [RIE42R2]: Thank you for the comment.

Commented [AC43]: There will always be costs attributable to achievement of higher savings, but I think this is getting at the implications of achieving savings from more costly technologies/end uses or savings that require barrier mitigation and other additional investments. Text should reflect this

Commented [RIE43R2]: To be addressed

- **Integration of natural gas and electric energy efficiency programs.** All programs are integrated across fuels where it is possible to optimize and benefit from synergies between the two energy systems.
- **Strategies to achieve targets.** As noted above, the overarching strategies highlighted in the 2024-2026 Plan permeate this Annual Plan.
- **Investments on behalf of all customers.** All customers contribute to energy efficiency program funding, and, in return, programs are designed so that all customers have the opportunity to participate. This element of equity is discussed further in section 2.6.
- **Efficacy.** The Company has incorporated opportunities to balance the portfolio of energy savings measures and program approaches to drive higher cost efficiencies (i.e., the amount of energy savings per dollar invested) and minimize the impact on customer bills. Efficacy also incorporates workforce development, which is described further in section 2.5.2.
- **Parity among sectors.** This Annual Plan examines the amount collected from the different sectors by the SBC, as compared to the program budgets by sectors, to ensure that sectors are generally receiving the benefits paid for. This is further described in section 6.3.2.
- **Cost effectiveness.** Programs are cost effective as required and shown in Attachments 5 and 6. The application of cost effectiveness as a design principle at a program level involves a balancing of comprehensive, costly projects with long-term measures, with programming that requires less intensive customer support, such as upstream programming that moves the incentive from the end user to the point of sale and Strategic Energy Management Planning with very large customers.

Further details on the Company's application of the Standards are found in section 6. As with any plan, this 2024 Plan was developed using the best information available at the time. Should circumstances change as the year develops, the Company will act in its capacity as Program Administrator to adapt as needed and inform stakeholders of the inability to execute a proposed strategy or commitment or the need to revise them.

2.3 Residential Programs

2.3.1 Overview of Residential and Income Eligible Energy Efficiency Programs

In 2024, the Company will continue all Residential and Income Eligible energy efficiency programs offered in 2023. All Residential and Income Eligible programs are funded by electric and natural gas customers. The Company offers the

Commented [SR44]: Maybe this is a bit of a nitpick, but the strategies above are characterized as 'how the annual plan achieves savings'. If it doesn't achieve enough savings to meet the targets, they aren't really strategies to meet the targets, right?

Commented [TE44R2]: Something to think about.

Commented [SR45]: Would prefer stronger commitment to all customers *participating equitably* (with a metric to measure this), not just having the *opportunity to participate*.

Commented [RIE45R2]: Noted

Commented [SR46]: Quoting the relevant standard: "All efforts to establish and maintain program capability shall be done in a manner that ensures quality delivery and is economical and efficient. The distribution company shall include wherever possible and practical partnerships with existing educational and job training entities."

Nothing in this language relates to the cost to achieve energy savings or 'savings per dollar invested'. To my read, establish and maintain program capability is not related to the cost of delivering savings, but rather specifically to investments in capacity building such as workforce development. Please remove all reference to cost efficiencies or cost to achieve savings in this description, as it is appears out of place and not consistent with the relevant LCP language.

Commented [RIE46R2]: To be addressed

Commented [GR47]: Define or maybe use another term/phrase

Commented [TE47R2]: Updated language.

Commented [CJ48]: Please review these comments along with comments provided on Attachment 1 as there is some overlap. Tried to hit main themes here, but many more specific comments provided in Res Attachment.

Commented [RIE48R2]: Noted

programs detailed below to provide comprehensive services to two regulatorily defined sectors, market rate and income eligible.

Residential Consumer Products

The Residential Consumer Products Program promotes the purchase of high efficiency household appliances carrying the ENERGY STAR® label including dehumidifiers, pool pumps, and room air cleaners. In 2024, the program will also promote the purchase of “Most Efficient” room air conditioners, dehumidifiers, refrigerators, freezers, clothes washers, and dryers. Consumers can participate by purchasing these products at retail stores or through the Company’s online marketplace. Residential Consumer Products also provides incentives toward advanced power strip purchases.

The program trains retail sales staff about the ENERGY STAR label and how to promote the certification’s energy and environmental benefits to consumers. The most efficient appliances are incentivized at the retailer level to encourage sales of these ENERGY STAR most efficient appliances. Additionally, the program offers refrigerator, freezer and dehumidifier recycling.

Home Energy Reports

The Home Energy Reports Program is a behavioral-based offering designed to make customers aware of their energy consumption through personalized print and email reports and a seamlessly integrated website. Each of the communication channels displays a customer’s energy consumption patterns, sets an energy reduction goal for each customer, and contains a normative comparison to similarly sized and heated homes. The goal of the Home Energy Reports Program is to inspire customers to take actions that reduce their energy consumption and increase their participation in other Company energy efficiency programs.

Residential High-Efficiency Heating, Cooling, and Hot Water

The Heating, Ventilation and Cooling (HVAC) Program promotes the installation of high efficiency central air conditioners and eligible heat pumps for electric customers and new energy-efficient natural gas related equipment including boilers, furnaces, windows, water heating equipment, thermostats, and water-saving devices. The program offers incentives for high efficiency air source heat pumps to customers with electric resistance heating as well as customers whose primary heating system is fuel by natural gas, oil or propane.

- Commented [GR49]:** There is no ENERGY STAR APS
- Commented [RIE49R2]:** Deleted
- Commented [RF50]:** Free riders? Have we reviewed all products to make sure it still makes sense to continue to incentivize all of them?
- Commented [CJ50R2]:** 2021 Energy Star Market Share Data from Glenn, note, we'll also provide similar comments in our BC Model Review:
+Dehumidifier - 94%
+Dryer - 40% electric, 50% gas
+Room AC - 55%
... [26]
- Commented [RE50R3]:** To address eligibility increase. RIE will move all of these appliances mid-stream to most efficient p... [25]
- Commented [GR51]:** Confirm that dryers are at Most Efficient. Currently they appear to be just at ENERGY STAR
- Commented [RE51R2]:** Dryers are currently in both channels but ES Dryer will be removed starting in 2024 per the requ... [27]
- Commented [GR52]:** Yes, but we've moved beyond basic ENERGY STAR - or should - for many/most appliances key... [28]
- Commented [RIE52R2]:** Noted
- Commented [GR53]:** Should this be continued given recent evaluations in MA, CT and NH. Do the RI efforts should suff... [30]
- Commented [AL(E53R2):** The RI Home Energy Reports was still producing robust savings during the last evaluation. Th... [29]
- Commented [RF54]:** Are these still providing meaningful savings? Savings have been dropping in other states to the... [31]
- Commented [AL(E54R2):** In RI, the behavior savings are still cost effective even with lifetime considerations.
- Commented [RF55]:** 2024 should be the year we cease incentivizing CACs, as other states (CT) have done in 2023 a... [32]
- Commented [SL55R2]:** RIE will eliminate CAC incentive (\$50 / ton) starting in 2024.
- Commented [GR56]:** These should be considered for removal from the program to encourage HP installs
- Commented [RE56R2]:** RIE will plan to eliminate CAC starting in 2024 & beyond
- Commented [RIE57]:** Steven Chybowski: Curious about the role of central ACs as ASHPs become more prominent. Is th... [33]
- Commented [TA(E57R2):** RIE will eliminate CAC incentive (\$50 / ton) starting in 2024.
- Commented [RF58]:** Time to transition away from gas incentives that encourage locking into gas for another 25 years.
- Commented [CJ58R2]:** This has been a key recommendation from both the Council and other stakeholders for a couple... [34]
- Commented [TA(E58R3):** Please see section 3.2.2 of 3YP for discussion of approach to natural gas incentives.

Incentives for energy-efficient central and ductless air source heat pumps for space and water heating equipment are available for customers with electric resistance heating/hot water. Incentives are also available for air source heat pumps used as cooling devices in homes with a primary heating system that is natural gas, oil or propane. The HVAC Program supports contractor training to increase accurate installation practices, testing of the high efficiency systems, tiered rebates for new high efficiency systems, and incentives for checking new and existing systems.

Residential New Construction

The Residential New Construction program offers financial incentives and no-cost education, training and technical support to builders and homeowners to promote the construction of high performing energy-efficient single family, multifamily and income-eligible homes. The program helps residential new construction and major renovation projects meet high energy performance standards and provides education and training support to builders, designers, tradespeople, and code officials.

EnergyWise Single Family

The EnergyWise Program offers single-family customers (homes with 1-4 dwelling units) in-home energy assessments, weatherization services, and information regarding their energy usage and energy-saving opportunities. The program is designed as a direct-to-customer offering that educates residential customers on how they can make their home more energy efficient. Energy specialists address base load electric use, and heating, cooling and water heating loads in single-family residential buildings through various measures including weatherization, along with the immediate on-site installations of advanced power strips and water-saving devices.

Once the assessment and energy saving installations are completed, participants receive energy efficiency recommendations and technical assistance, as well as financial incentives to upgrade to high efficiency HVAC equipment, water heating systems, insulation, and smart thermostats. Customers also receive an Energy Action Plan detailing the additional energy savings opportunities they have through participation in other Company energy efficiency programs. Qualified customers can receive zero percent financing to install these high efficiency upgrades through the Company's financing programs, including the HEAT Loan.

Commented [RF59]: Both central and ducted? We are seeing a lot of uptake in ducted homes with central heat pumps.

Commented [CJ59R2]: Yes, though wouldn't hurt from clarifying in text.

Commented [RIE59R3]: Yes, refers to both central and ducted

Commented [GR60]: The nature of continued incentives for fossil fuel equipment should be revisited along the lines of what is being done in MA and CT.

Commented [RIE60R2]: Noted

Commented [GR61]: Speak to all-electric offer

Commented [RIE61R2]: Explanation in Section 3.2.2 of 3YP.

Commented [RF62]: Time to follow other states like CT by moving to an electric only offering.

Commented [RIE62R2]: Explanation in Section 3.2.2 of 3YP.

Commented [GR63]: These do not address heating or cooling use

Commented [CJ63R2]: I think this applies to the base load electric use portion of the sentence, but agree the way it is written is confusing. This sentence should be revisited for clarity.

Commented [RIE63R3]: To be addressed

Commented [RF64]: Are we able to provide the plan that will get the home to net zero?

Commented [AL64R2]: We have the Path to Zero Energy Home brochure which we can include in program materials.

Market Rate Multifamily

This program offers comprehensive energy services for market rate multifamily customers (buildings with 5+ dwelling units), including energy assessments, incentives for heating and domestic hot water systems, cooling equipment, and weatherization. All types of multifamily properties are eligible. A primary point of contact is designated to manage and coordinate services offered through the Company's existing portfolio. This program is offered in conjunction with the C&I Multifamily Gas Program where a site may have a commercial meter or office space but also has individual dwelling units. The delivery of the Market Rate Multifamily Program's services should be virtually indistinguishable to the customer as the Company's single point of contact will handle all program overlap (between Residential and C&I energy efficiency programs) and offer a seamless customer experience. See Attachment 1 for more detail on the program and some new ideas to improve performance moving forward.

Commented [RF65]: Where is the innovation that will move this program to achieve goal this year?

Commented [AL65R2]: Demonstration for landlord outreach through Equity focused outreach plan.

Income Eligible Programs

The Company wants customers who meet the income eligibility requirements and may have a high energy burden and/or difficulty paying their electric or gas bills to participate in, and benefit from, the Company's energy efficiency programs. Therefore, the income-eligible sector is designated as a unique sector and funding for this sector is subsidized by both non-income-eligible residential customers and C&I customers so a larger proportion of income eligible customers can be served.

The Income Eligible Services (IES) Program offers home energy assessments, weatherization services, appliance, and heating system replacements with no customer cost to qualified single-family customers. Customers who qualify for the A-60 rate or for the Low-Income Home Energy Assistance Program (LIHEAP) are eligible to receive all services and equipment upgrades at no cost. The IES Program's services are delivered by local Community Action Program (CAP) agencies who coordinate with outside contractors that perform heating system and appliance replacements and weatherization installations with oversight provided by a Lead Vendor.

Commented [RF66]: But just performing CAPs, right?

Commented [AL66R2]: In 2023 the Company removed partial territories from underperforming CAPs and reassigned to high performing CAPs. Awaiting results of redistricting.

The Income Eligible Multifamily Program offers comprehensive energy services for multifamily customers that also meet the criteria for "income eligible" as defined in Attachment 1: Residential and IES Programs, Section 4: Multifamily. These services include energy assessments, incentives for heating and domestic hot water systems, air source heat pumps, cooling equipment, water-saving installations, and smart thermostats. Typically, there are no costs to the customer for these services as most income-eligible upgrades are covered at 100 percent.

Commented [RF67]: Same comment as above about looking for new approaches and innovation to make sure we meet goal this year.

Commented [AL67R2]: Just put into place the IES ASHP initiative this year. Need some time to get the process moving and hit goals. This is a major focus for IES in 2024.

2.3.2 Major Residential and Income Eligible Program Changes

In 2024, the Company will continue to offer the full suite of Residential and Income Eligible programs listed above. These programs will be delivered in an equitable manner to make Rhode Island homes energy efficient through advanced building standards, weatherization, high efficiency HVAC and hot water systems, efficient appliances, behavioral strategies, smart thermostats, and more. In acknowledgement of the broad adoption of energy efficient lighting in the residential market and federal lamp standards, lighting will no longer be offered as a measure across residential programs beginning in 2024.

A top priority for the Company is to develop an equity-driven approach to the design, implementation, and marketing of Residential and Income Eligible programs. In 2024, the Company is committed to working with the EWG and other stakeholders to make sustained progress on equity initiatives. The Company plans to allocate Residential and Income Eligible program budgets to increase marketing to underserved populations. The Company has proposed an assessment demonstration to partner with community-based organizations that have the experience and established relationships with neighborhoods and municipalities to promote the benefits of energy efficiency. If implemented, the Company would be working with the EWG to design this demonstration assessment. For additional detail, please see Attachment 8.

Due to pre-weatherization barriers (including but not limited to asbestos, knob-and-tube wiring, mold and mildew, and vermiculite) some customers are prevented from receiving the valuable weatherization services offered through the EnergyWise, Multifamily and IES Programs. During the 2024 program year, the Company will continue to collaborate with stakeholders and other groups to assess best practices and new strategies to address these pre-weatherization barriers. The Company will expand on and refine recent initiatives regarding data tracking of deferrals and pre-weatherization barriers across all Residential and Income Eligible programs.

The Company plans to coordinate with OER to leverage additional funding opportunities for energy efficiency measures and projects funded through the American Rescue Plan Act (ARPA) and IRA, such as Clean Heat RI Program. This program is administered by OER and received \$25 million in ARPA funds to provide financial incentives to residential and C&I customers for the purchase and installation of high efficiency electric heat pumps. The Company is also working on a new Multifamily Financing offering for the 2024 program year. Please refer to Attachment 8 for more detail on this initiative.

- Commented [GR68]: And the imposition of Federal lar ... [35]
- Commented [AL68R2]: updated
- Commented [RF69]: Correct for screw-based LEDs. W ... [39]
- Commented [RIE69R2]: Added a comment in Attach ... [38]
- Commented [SR70]: I would support ADDING direct in ... [36]
- Commented [RIE70R2]: Per Richard's comments we ... [37]
- Commented [RIE71]: Steven Chybowski: Noted
- Commented [RF72]: Good. What are the concrete ste ... [41]
- Commented [RIE72R2]: Please refer to Equity Sectio ... [40]
- Commented [ML73]: Please speak to how the EWG's ... [44]
- Commented [RIE73R2]: Please see Equity Section 2.7 ... [43]
- Commented [SR74]: It would be great to have more s ... [45]
- Commented [CJ74R2]: I would add that any plan sho ... [42]
- Commented [RIE74R3]: To be addressed
- Commented [SR75]: Increase by how much \$?
- Commented [RIE75R2]: To be addressed
- Commented [RF76]: What are the metrics we hope to ... [47]
- Commented [RIE76R2]: Please see Section 2.7.
- Commented [ML77]: How about measure incentives? ... [48]
- Commented [RIE77R2]: Please see Figures 1 and 2 in ... [46]
- Commented [RIE78]: Steven Chybowski: Again, this r ... [49]
- Commented [RIE78R2]: To be addressed
- Commented [RF79]: Please commit.
- Commented [SL79R2]: See Att. 8
- Commented [SR80]: This sounds interesting, but the ... [52]
- Commented [DB80R2]: This idea was presented to th ... [51]
- Commented [DB80R3]: Please refer to attachment 8 ... [50]
- Commented [RF81]: Mold and mildew, too?
- Commented [TE81R2]: Added.
- Commented [RF82]: Can you commit to establishing a ... [53]
- Commented [RIE82R2]: To be addressed
- Commented [SR83]: This does not read as a major cha ... [54]
- Commented [RIE83R2]: Noted.
- Commented [SR84]: Very important to understand wf ... [56]
- Commented [TE84R2]: Will work with OER in 2024 to ... [55]
- Commented [RF85]: Good
- Commented [RIE85R2]: Thank you
- Commented [RIE86]: Margie Lynch: What about pron ... [60]
- Commented [RIE86R2]: Information on tax credits h ... [58]
- Commented [RIE87]: Samuel Ross: Interesting idea - ... [59]
- Commented [RIE87R2]: Please refer to Attachment 8 ... [57]
- Commented [RIE88]: Steven Chybowski: Same as ab ... [62]
- Commented [SL88R2]: I added 'Please refer to Attach ... [61]

The Company is actively implementing its income-eligible focused Heat Pump Plan to encourage electric resistance heating customers to upgrade to air source heat pumps systems. These high efficiency systems reduce annual energy expenditures and decrease reliance on fossil fuels. As part of RI Energy’s Heat Pump Plan, the Company was directed by the PUC to develop a Heat Pump Plan to achieve 750 conversions annually by 2025 with 25 percent of those customers served classified as income eligible. In 2024, the Company will continue to aggressively reach out to income-eligible customers to upgrade to efficient electric heating.

2.4 Commercial and Industrial Programs

2.4.1 Overview of Commercial and Industrial Energy Efficiency Programs

The C&I Programs offer incentives, rebates, technical assistance, and financing to customers that look to reduce energy consumption, cut greenhouse gas emissions, or meet corporate sustainability goals. To reach customers, the Company uses a market sector approach, whereby specific energy efficiency initiatives are developed to meet the needs of different market segments (e.g., the Grocery program, Chain Restaurants, and the Industrial Initiative). In addition to the market sector approach, the Company also provides Prescriptive and Custom offerings. The Prescriptive offerings are available for a wide variety of standardized energy-efficient products with “deemed” savings values, such as lighting equipment, air compressors, variable speed drives, and stream traps. While the Custom offerings are available for any energy conservation measure that is not covered under alternative pathways.

In planning the Commercial and Industrial programs, the Company evaluates customer needs, market dynamics, and State policy objectives to determine how program offerings can be enhanced or adjusted to drive market transformation across multiple end-uses. Another central component to the planning process is the development of strategies that advance more equitable services, particularly within the Small Business and Multifamily Programs.

The C&I Programs are listed below. For more details regarding program details and upcoming changes, please see Attachment 2: C&I Programs.

Large C&I New Construction and Building Energy Code Support

The Large C&I New Construction Program offers financial incentives and technical assistance to customers, design professionals, developers, and vendors to encourage energy efficiency in new construction, major renovation, planned replacement of aging equipment, and replacement of failed equipment projects. C&I customers with an annual electric consumption greater than 1.5 million kWh per year are eligible.

Commented [RF89]: Should this be 40% to be in line with the Justice40 goals?

Commented [CJ89R2]: Fair point, Commissions direction should be the bare minimum.

Commented [TA(E89R3): Thanks for the comment. We will consider.

Commented [SR90]: Rather than a 'concerted effort' please give a quantitative target. Is the company expecting to deliver 750 in 2023, followed by an additional 750 next year? An Additional 500? 1000?

Commented [RIE90R2]: The heat pump plan filing included 120 customers served in 2024 and 190 in 2025. These numbers were considered in planning.

Commented [RIE91]: Adrian Caesar: Bulk of comments included in C-Team comments on Attachment 2. Any comments applicable there apply to these sections as well, where appropriate

Commented [RIE91R2]: Thanks for the note Adrian.

Commented [MH92]: Are there no midstream offerings?

Commented [RIE92R2]: Please see Attachment 2.

Commented [MH93]: Attachment 2 mentions a threshold of 1 million kWh

Commented [RIE93R2]: Updated. Thanks for bringing to our attention.

Through the program, design professionals are eligible to receive technical assistance to conduct energy modeling and analysis for new construction projects. Owner's design teams are offered incentives for their time and effort to meet program requirements. The program promotes and incentivizes the installation of high efficiency equipment in existing facilities during remodeling projects or for equipment failure and replacement. Since customers are more likely to install energy-efficient equipment at the time of construction or equipment replacement, the program offers incentives to ensure customers make the investment immediately rather than doing so at a greater cost later. The program also offers operations verification or quality assurance services to ensure that installed equipment and systems operate as intended.

The program supports the state's Zero Energy Building goals through engagement and in developing future offerings. The program promotes compliance with the building energy code to support the State's goals and objectives. Technical assistance is provided for advancing the development and adoption of minimum efficiency standards for appliances and equipment.

Large Commercial and Industrial Retrofit

All commercial, industrial, and institutional customers are eligible to participate in the Retrofit Program. The program incentivizes the replacement of existing equipment and systems with high efficiency alternatives when the customer might otherwise not plan on making efficiency investments. Incentivized measures include lighting, HVAC systems, motors, thermal envelope measures and custom measures in existing buildings. Technical assistance is offered to customers to help them identify energy-saving opportunities.

The program's incentives help C&I customers in defraying part of the material and labor costs associated with the installation of energy efficiency measures. In addition, the Company offers education and training, such as the BOC training, to support the adoption of energy-efficient equipment and practices.

Small Business Direct Install

This program is a retrofit offering that provides turn-key efficiency solutions to customers who use less than 1.5 million kWh per year. Through the program, a free on-site energy assessment is performed, and customers receive a customized report detailing recommended energy-efficient improvements.

From local pizzerias to small convenience stores, the Small Business Direct Install Program serves small businesses of all customer types, buildings and sizes. The program pays up to 70 percent of installation and equipment costs. Provided funds are available, customers can finance the remaining costs of the project for up to 60 months (typically 24) interest free on their electric bill using the Small Business Revolving Loan Fund.

Commented [AC94]: Are there still caps based on cost-to-achieve? i.e. program pays 70% of costs, up to \$XX per kWh or MMBtu?

Commented [RIE94R2]: It's up to 70% of the cost of labor & material,

Commercial and Industrial Multifamily

The C&I Multifamily Program provides comprehensive efficiency services for market rate multifamily customers who reside in residential buildings with 5+ dwelling units. These coordinated services include energy assessments and incentives for weatherization and the replacement of heating and domestic hot water equipment and systems. The program's services are offered for all types of multifamily properties.

To streamline the delivery of program services, the Company designates a primary point of contact for the multifamily property who will manage and coordinate the services offered. The measures and services are offered through the Company's existing Energy Efficiency Portfolio of C&I Programs (C&I Retrofit) and Residential Programs (EnergyWise, Income Eligible, Residential New Construction and ENERGY STAR HVAC).

2.4.2 Major C&I Program Changes for 2024

The Company plans to make a number of modifications and enhancements to the C&I Programs during the 2024 program year. Some of these changes will affect how the Company engages customers in energy efficiency while other modifications focus on providing more innovative efficiency measures and services to C&I customers to capture all energy-saving opportunities. Intertwined, all the modifications and enhancements are designed to engage C&I customers and drive energy efficiency across Rhode Island. In 2024, the Company plans to implement the following strategies for its C&I programs:

Commented [SR95]: What does 'data drive approach' mean? Why is this a change? I assume data was being used previously, so its difficult to assess what this means without supporting detail about what new data will be used or what new ways data will be used.

Commented [DE95R2]: (The top two bullet points have been merged to provide additional clarity as to what a data-driven approach entails)

Longer answer:
The Company utilizes a Market Sector approach to serve a diverse and complex set of customers. This approach allows the Company to address customer needs that are shaped directly by strategic and commercial pressures specific to their industry and the geographies in which the customers operate. And while the Company utilizes data in this effort, the Company's new system of record (re: InDemand replacement) will provide additional data splicing capabilities and more reliable insights into customer trends. This will allow the Company to offer more targeted engagement, whether that's through a specific measure offering, technical support, or even marketing material.

Commented [SR96]: Can you explain the connection between SEM and sustainability? What specific sustainability outcomes are achievable through SEM, under the constraint about fuel switching? Also, what is the target number of customers for the 'expanded reach'?

Commented [RIE96R2]: Apologies for any confusion. This isn't a comment about SEMP driving sustainability but rather an expectation that an organization embracing sustainability will be more interested in energy efficiency and, we hope, more predisposed toward strategic energy management. See Attachment 2 for more detail on SEMP targets.

- Deploy a data-driven approach to increasing customer participation in the C&I sector. Including analyzing customer consumption data (e.g., kilowatt-hours, peak load and therms) and past energy efficiency participation to better target customers, especially nonparticipants.
- Expand the reach of the Strategic Energy Management Plan Initiative to support the increasing number of customers with climate and sustainability goals.
- Support more advanced system controls, energy management systems and building analytics through retro-commissioning, monitoring-based commissioning, equipment right sizing and the Upstream Initiatives.

- Develop a host of prescriptive and custom offerings to promote commercial weatherization and greenhouse gas emission reductions through the installation of energy recovery ventilators, upstream heat pumps, and measures to prevent gas and refrigerant leak reductions.
- Promote the Main Streets Initiative in Environmental Justice Focus Areas.²³
- Enhance continuing education for building managers and facilities operators.

2.5 Cross Cutting Programs

2.5.1 Equity

Equity is a key priority for the 2024 Plan. The Company is committed to ensuring customers across Rhode Island have equitable access to energy efficiency, regardless of their income, geographic location, primary language, business size, home ownership status, or other relevant barriers. The Company planned and developed its 2024 Energy Efficiency Portfolio with a conscious effort to serve all customer including low-and-moderate income and small business, gender, racially and ethnically diverse, and non-native English-speaking customers.

Throughout the 2021-2023 term, RI Energy and OER have co-hosted a series of EWG meetings facilitated by the Green & Healthy Homes Initiative. The purpose of these meetings is to provide the Company with written recommendations to advance equity in the planning, design, and delivery of its energy efficiency programs. The EWG has released two reports, in 2022²⁴ and 2023,²⁵ making recommendations for strategies and specific measurable actions for the Company to take to increase equity in energy efficiency. For the planning process for the 2024 Plan, RI Energy has

²³ The Rhode Island Department of Environmental Management defines an Environmental Justice Focus Area as a census tract that meets one or more of the following criteria: (1) annual median household income is not more than sixty-five percent (65%) of the statewide annual median household income, (2) minority population is equal to or greater than forty percent (40%) of the population, (3) twenty-five percent (25%) or more of the households lack English language proficiency, or (4) minorities comprise twenty-five percent (25%) or more of the population and the annual median household income of the municipality in which the proposed area does not exceed one hundred fifty percent (150%) of the statewide annual median household income.

²⁴ [2021 Rhode Island Energy Efficiency Equity Working Group Report](#), prepared by Green & Healthy Homes Initiative, rel. Sep. 2021.

²⁵ See 23 Id.

Commented [SR97]: This sounds great, but more detail is important here, including planned update quantities for new / expanded offerings.

Commented [RIE97R2]: Noted

Commented [SR98]: This doesn't read like a change, as I assume these conversations are already happening. It also is not a program feature, more of a general effort by EE staff (still good to do, just not sure its in the right section). What are the expected outcomes or desired results of this effort specifically for C&I program implementation?

Commented [TE98R2]: Removed.

Commented [SR99]: Was the initiative not previously being promoted in these areas? If it was, then this isnt a change for programs unless there are clear, specific incremental efforts to increase the promotion and uptake of Main Streets in these areas.

Commented [RIE99R2]: In 2023 this initiative was run in Woonsocket, East Providence and Central Falls. The five communities targeted in 2024 are Pawtucket, Providence, Cranston, West Warwick and Middletown/Newport which is what this comment is referring to.

Commented [SR100]: This is an outcome, not an action. What will be done to achieve this? For this and my comments above, perhaps the details are listed elsewhere in this document. If they are, it would be super helpful for the readership of the main text if the location of the more detailed implementation strategy for each of these changes was listed (e.g. Appendix A, p. 10). This way, if someone is mostly interested in one area, they can directly navigate there without having to read the entire appendix.

Commented [SR100R2]: Same goes for Res major change areas

Commented [BE100R3]: this is detailed more in the Workforce Development section; appreciate the feedback on organization

Commented [GR101]: Should anything be said here about Codes and Standards support?

Commented [RIE101R2]: Please see Table 2 below.

Commented [SR102]: Strongly encourage the company to move past the 'equitable access' paradigm and focus on 'equitable outcomes'. Access does not result in participation or equitable results. Access is also difficult to measure, track, and verify, and is a means, rather than an end, for achieving equity in the EE programs. This is where clear, time-bound, quantitative, measurable equity outcomes should be woven in, so progress can be tracked over the course of 2024 and 2025 to enable a clear assessment of attainment of equitable outcomes.

Commented [RIE102R2]: To be addressed

worked with the EWG to develop the Company's 2024 Equity Commitments. For more information regarding the Company's 2024 Equity Commitments, please see section 2.7.

2.5.2 Workforce Development

Clean energy and energy efficiency programs are drivers of job creation in Rhode Island. The Company's energy efficiency programs support a large clean energy workforce of local and regional vendors, contractors, distributors, and suppliers. It is important that the jobs and economic benefits created from energy efficiency jobs reach all Rhode Island communities, especially Environmental Justice Focus Areas.

The success of Rhode Island's energy efficiency programs depends on having a highly skilled workforce. In 2024, the Company will collaborate with the Rhode Island Department of Labor & Training, the Governor's Workforce Board, and other stakeholders to identify the needs of the current and future energy efficiency workforce and to pursue federal funding in coordination with existing clean energy programs. **Increasing workforce capacity and diversity** creates additional opportunities for the Company to pursue equity-driven strategies by supporting and recruiting new workers from marginalized communities, as well as opportunities to increase the level of activity in future energy efficiency plans in areas where workforce is currently a limiting factor.

During the 2024-2026 term, the Company's workforce development efforts will be based on the recommendations from the recently released Rhode Island **Workforce Needs Assessment Study**.²⁶ More details on the study can be found in the 2024-2026 Plan. The study made four recommendations for RI Energy, for which responses are provided here:

- 1) Encourage workforce ecosystem coordination and leadership by advocating for increased emphasis on energy efficiency and workforce development within relevant state-wide entities and supporting emerging leadership efforts in the state around energy efficiency workforce development.**

The study identified many entities and organizations currently offering training, certification and continuing education credits that support workforce development within energy efficiency. Some groups also provide funding and grants, as well as financial support for surround-care to help people with transportation or childcare challenges. Given the rich ecosystem of resources that already exists within the state, an effective next step would

Commented [GR103]: Maybe best addressed in Attachment 1, but there is a clear need to train on HPs and HWPBs and for RNC on all-electric NC and Passive House.

Commented [BE103R2]: Please refer to Attachment 1 for further detail

Commented [SR104]: And opportunities to increase the level of activity in future EE plans in areas where workforce is currently a limiting factor.

Commented [BE104R2]: added

Commented [RIE105]: Adrian Caesar: No specific emphasis of workforce diversification. Equity-driven strategies need to address the existing workforce demographic, which is not comprised of many workers from these marginalized and underserved communities. If equitable outcomes are to be achieved, then workforce development needs to acknowledge this fact and work to address it (multilingual trainings, partnerships with CBOs to recruit/train/attract talent in underserved communities, etc.)

Commented [BF105R2]: Equity-driven strategies will be detailed further in the Equity section of the plan

Commented [AC106]: Study is online and can be linked: <http://rieermc.ri.gov/wp-content/uploads/2023/08/rie-workforce-needs-assessment-final.pdf>

Commented [RIE106R2]: Added link in footnote – thanks Adrian

²⁶ [2023 Rhode Island Workforce Needs Assessment Study](#), prepared by BW Research Partnership, rel. July 2023.

be to create an entity (i.e., group/web location) where these resources can be centralized and made available. This would greatly facilitate access to resources, easy to promote and bring more awareness about opportunities for residents.

The Governor’s Workforce Board is the state’s long-standing primary workforce training and investment entity, helping state entities design, fund and build training programs. They have just begun to form a new subcommittee, the Green Energy Workforce Advisory Committee, which would be perfectly positioned to lead the drive for energy efficiency workforce development. The Company will support the efforts of this Board and Committee to help develop a central resource for the state.

2) Support marketing efforts and pipeline building by further leveraging the Company’s marketing and communications capacity with credible information resources and campaigns and by partnering with groups, especially those serving underserved communities, to raise awareness about the value and opportunities of energy efficiency jobs.

The Company is well known in Rhode Island and has a wide reach to customers/residents across the state. RI Energy’s marketing and communications teams promote availability of the energy efficiency programs through a variety of mediums on a regular basis. The Company will leverage these existing efforts to promote opportunities for energy efficiency training and careers, and partner with groups, such as the Rhode Island Builders Association (RIBA) to reach underserved communities.

3) Champion energy efficiency-related programs at all levels of education by increasing support for specific programs in high schools and vocational-technical schools, including curriculum development, instructor recruitment, internships, and equipment needs.

High schools, vocational technical schools and adult training programs are an opportunity for bringing new workforce to energy efficiency, particularly when it comes to the trades. The Company will work with and support RIBA and the Residential Construction Workforce Partnership (RCWP) to enhance and improve their existing educational programming.

4) Partner with contractors to expand diverse worker recruitment by communicating the benefits of energy efficiency careers, funding career navigators and wraparound supports, and educating contractors about the opportunities in energy efficiency.

Commented [AC107]: Support this effort. Reminiscent of the strategy that Rewiring America/the Company are using to centralize different state, federal, and utility offerings for EE. Still need more detail on how the Company would support/oversee WFD - without details on that it seems as though we are mainly delegating the work to other entities

Commented [BE107R2]: thanks

Commented [AC108]: Whether or not funding for such efforts should come from ratepayers, this support should definitely include recommendations for trainings/certifications necessary to continue to deliver energy savings and benefits in this rapidly changing landscape

Commented [FB(E108R2): agreed

Commented [SR109]: This all sounds good, but I wonder if there is adequate specific focus on EE workforce needs - specifically things like insulation contractors, HP and central heating experts, individuals capable of remediating pre-weatherization barriers, and specifically the development of these and other EE skills in historically underserved communities, as noted as a goal earlier in the document. I worry that by solely positioning the company as in a support role here, the EE need could be lumped together with a wide variety of other workforce development initiatives.

Commented [FB(E109R2): That will come through some of the activities further down in the plan

Commented [AC110]: There are a smaller amount of MWBE contractors/service providers in the state, but does the Company have a sense of how many work in the program? Wonder if there are MWBEs/contractors from underserved communities still unaware of the programs or unable to participate. If there are, then how can existing efforts be expanded or new efforts implemented to get these contractors into the EE programs?

Commented [FB(E110R2): Agree with the need to assess this

Commented [SR111]: Yes, the company can. What specific things is the company committing to doing next year to deliver on this recommendation?

Commented [BE111R2]: added some language

Commented [GR112]: Given overall budget constraints this needs to be done thoughtfully and strategically.

Commented [BE112R2]: agreed

Commented [AC113]: One good example of a program to get new entrants into the workforce is the Clean Energy Pathways internships sponsored by the MA PAs. It includes subsidies ... [63]

Commented [FB(E113R2): Thank you

Commented [SR114]: Again this sounds good, but is a generalized commitment to continue ongoing support effo ... [64]

Commented [FB(E114R2): RIBA and RCWP support is noted in the project list below

Commented [AC115]: Again, need to consider expanded diversification here. The Plan should reference results from ... [65]

Commented [FB(E115R2): Added language

RI Energy and its energy efficiency vendors are connected to a large network of contractors in the state, including insulation, HVAC, energy auditors and specialists, builders, contractors, and engineers. The Company can partner with this network of contractors to identify their needs and connect them with resources including wraparound services and career navigators.

In 2024, the Company will proactively prepare for an expansion of energy efficiency due to IRA federal funding for Residential, Income Eligible, and C&I projects. With increased funding from IRA and the greenhouse gas emission reduction goals mandated by the Act on Climate, the need for highly skilled professionals in Rhode Island's energy efficiency workforce is only growing. The Company will increase its continuing education and training opportunities for existing and future members of the energy efficiency to build capacity and meet demand.

Meeting the increased demand for energy efficiency will require significant expansion of the current efficiency workforce and supply chain, as well as leveraging the knowledge and training opportunities available through trade allies. RI Energy plans to increase workforce trainings to support zero-net energy projects, building operator certification, HVAC system optimization and controls, heat pump technologies, weatherization, and general energy efficiency skills, such as auditing and the Association of Energy Engineers' Certified Energy Manager (CEM) certification. The Company will also enhance its continuing education opportunities for building managers and facilities operators. RI Energy will also increase its efforts to recruit technical and vocational students and educate them about the career opportunities they have in energy efficiency.

The Company will continue its support of the Energy Expo at the Rhode Island Home Show in 2024. In 2023, the Energy Expo resulted in over 150 direct energy audit appointments for customers, as well as the potential for many more based on postcards that customers took home. Furthermore, it is a valuable workforce development activity, in cooperation with RIBA and Rhode Island's Career Technical Education (CTE) programs, to involve schools and students at the Energy Expo. The model for having students and schools participating in building features and educating consumers along with industry partners has been adopted by the Rhode Island Department of Education as an approved work-based learning and career exploration curriculum to satisfy internship/career exploration requirements for graduation. RIBA presented on the results of the 2023 Energy Expo at the July 20, 2023 EERMC meeting.²⁷

Commented [SR116]: What degree of increase is planned? How many total training recipients will there be in 2024, and how does that target number compare to 2023?

Commented [FB(E116R2)]: See project list and budgets below

²⁷ RI Home Show: Energy Expo RIBA [Presentation](#), presented at EERMC meeting (Jul. 20, 2023).

Table 2~~Table 2~~Table 3 below shows the Company’s continued workforce development activities.

Formatted: No underline

Table 2. Continued Workforce Development Activities

Sector	Workforce Development Activity	Description	Target Audience
Res	HVAC Check trainings	HVAC installation best practices training delivered as part of the HVAC Program	HVAC technicians
Res + IE	Zero Net Energy training	High performance building best practices training delivered as part of the Residential New Construction Program	Design professionals, builders and contractors
IE	Miscellaneous income-eligible training	Training on topics such as smart thermostats and air source heat pumps delivered as part of the IES Single-Family Program	Weatherization contractors, auditors
Res	RI Builder’s Association and Residential Construction Workforce Partnership (RCWP) training	Weatherization focused training. Students recruited from community with anticipation of returning to their community and supporting local CAP agencies	Weatherization for both Income Eligible and Market-Rate applications
C&I	Zero Net Energy training	High performance building best practices training delivered as part of the C&I New Construction and Major Renovations Program	Design professionals, developers and contractors
C&I	BOC training	Building operations and maintenance (O&M) best practices training delivered as part of the C&I Retrofit Program	Facility managers, building maintenance staff
C&I	Controls Best Practices training (HVAC and Lighting Controls)	ASHRAE Guideline 36 training (Sequence of Operations)	Contractors, engineers
C&I	Controls Best Practices training (HVAC and Lighting Controls)	Lighting Design Lab (lighting controls) training	Contractors, engineers, program technical and sales staff
All sectors	Codes & Standards – code compliance training	A suite of services which includes training sessions (classroom, webinar, and in-field), project-specific “hotline” support, and	Code officials, design professionals, builders, developers and contractors

Sector	Workforce Development Activity	Description	Target Audience
		development and delivery of tools and resources to fill industry gaps	

To further address the training needs that will be required to prepare for the adoption of the 2024 IECC building code, the Company has planned for the Additional Workforce Development activities in 2024 (and 2025 as needed).

Table 3. Additional Workforce Development Activities

Sector	Workforce Development Activity	Description	Target Audience
Res	Train the Trainer	A “train the trainer” program will multiply the number of qualified instructors and allow for an increased training capacity	Code trainers
Res	Reimburse Program Approved Trainers	After completing the trainer course, qualified instructors will be compensated to deliver code update trainings	Code trainers
Res	Full Day Workshops	Full-day workshops allow for a deeper level of instruction for trainees looking for more detailed or specific code information such as design and plan review, HVAC implementation, etc.	Code officials, design professionals, builders, developers and contractors
Res	LMS System Trainings	LMS style trainings can be pre-recorded and linked to various state and industry websites. This will allow trainees with time or transportation constraints to attend trainings on their own time	Code officials, design professionals
Res	HERS Rater Training & Certification	Rhode Island will need to increase this workforce network dramatically to meet the needs of the industry once the new code takes full effect	HERS Raters

The Company will coordinate workforce development efforts with the appropriate state and local authorities to maximize and leverage the impact of the incremental initiatives that will be undertaken. For example, OER is pursuing

federal Department of Energy (DOE) workforce funds for an HVAC Heat Pump Apprentice Program and Clean Energy Internship Program, which can complement RI Energy's workforce development activities.

2.5.3 Multifamily Landlords

The Company plans to heavily promote heat pump upgrades and other applicable energy efficiency measures to building owners and landlords. RI Energy recognizes gaps in current financing offerings, such as a lack of options for landlords in the Multifamily Program. In 2024, the Company plans to work to find effective ways to address these gaps and has proposed a new Multifamily Financing Program demo. Please see Attachment 8 for additional detail.

2.5.4 Enhance Financing and Funding Options

The Company currently offers several financing vehicles to customers including the On-Bill Refinancing Loan, Third-Party C&I Financing Loan, HEAT Loan, and financing through the Efficient Buildings Fund. In 2024, the Company will investigate ways in which these offerings can be expanded to serve more customers, including increasing loan limits for comprehensive projects. To make financing more useful in moving projects across the finish line, the Company will provide additional training on available financing mechanisms and how to position them effectively to internal sales staff and trade allies.

In addition to financing, the Company will collaborate with OER to integrate program incentives with state and federal funding. OER will administer \$64 million in funding from the federal IRA in addition to \$25 million from ARPA for its Clean Heat RI Program. The IRA also offers several enhanced tax credits to encourage homeowners to pursue efficiency and electrification measures. Rhode Island Infrastructure Bank, in addition to their \$5 million annual allocation of program dollars, received an additional \$5 million from a 2022 state bond issue to support a small business energy efficiency fund. The Company intends to leverage these outside dollars to encourage greater program participation.

2.5.5 HVAC Equipment

The Company plans to coordinate with OER to leverage additional funding opportunities for energy efficiency measures and projects funded through ARPA and IRA, such as the Clean Heat RI Program. This program is administered by OER and received \$25 million in ARPA funds to provide financial incentives to residential and C&I customers for the purchase and installation of high efficiency electric heat pumps.

The Company will target electric heat resistance heat pump upgrades as outlined in the Company's *Electric Resistance Heating to Air Source Heat Pumps: Implementation Plan for the Income Eligible Sector*. The Company was directed by

Commented [SR117]: Would prefer this to be focused on maximizing the impact of the significant incremental effort the company will be undertaking. I agree avoiding duplicative effort is important, just think it could be framed as pursuing a positive goal rather than avoiding a negative outcome.

Commented [FB(E117R2)]: addressed

Commented [ML118]: This needs more, as it doesn't acknowledge the wide variety of different building types and ownership situations. Small MF properties need the greatest support.

Commented [RIE118R2]: Thanks for the comment. Please see Attachment 1 for more detail on multifamily approaches.

Commented [RF119]: Can you commit to developing?

Commented [RIE119R2]: To be addressed

Commented [SR120]: Establish and launch? By when? How many participants are targeted? What level of funding is contemplated? Will the seed capital for the financing tool come from ratepayer dollars or somewhere else?

I think this is potentially a really good idea, with the specifics likely to dictate the degree of impact that can be expected here. I would be happy to support efforts to build out the details of this program.

Commented [RIE120R2]: Updated

Commented [SR121]: I suspect the value proposition of current financing tools is very attractive in the current interest rate environment, since these tools offer reduced or zero interest options for some customers. Highlighting this may be a useful tool in the effort to leverage financing to increase program participation levels.

Commented [FB(E121R2)]: Thank you

Commented [SR122]: Important to consider how much OER plans to disburse each program year, and not just consider the total dollar amount.

Commented [RIE122R2]: Noted

Commented [RF123]: This is free money currently available. What are RIE's plans to leverage this? This should be happening in 2023 and emphasized for 2024 to help leverage all programs.

Commented [AT123R2]: Addressed in Annual Plan

Commented [RF124]: Where are we with exploring the Advanced Water Heating Standard to incorporate the quiet ... [66]

Commented [RIE124R2]: To be addressed

Commented [GR125]: But can't OER's efforts to address delivered fuel displacements by HPS also be a key program focus?

Commented [TE125R2]: It is a focus. We are already coordinating with OER on their Clean Heat RI program and ... [68]

Commented [AC126]: Understand that this plan is focused on IES customers, but think that small businesses should also ... [67]

Commented [RIE126R2]: Please see p.40 of Attachment 2 that addresses this and other electrification efforts for Sma ... [69]

the Public Utilities 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. In 2024, the Company will make a concerted effort to upgrade income-eligible customers.

2.6 Participation and Outreach

In 2024, the Company will continue to drive participation through two main pathways – targeted programs and broad-based programs. Targeted programs include the Company’s retrofit, new construction, product rebate, and small business initiatives. These programs serve to drive deeper savings to targeted customer segments and offer a wide array of energy efficiency measures. The Company also reaches broad participation by promoting products upstream and through Home Energy Reports. These broader based programs provide value by reaching a wide and diverse set of customers, helping to provide more customers with access to energy savings, as well as acting as a gateway to drive participation in other Company energy efficiency programs.

In 2024, the Company will continue its efforts to reach customers who have never participated in its energy efficiency programs. A comprehensive marketing campaign will be deployed in English and Spanish that will educate customers on the availability of the programs. The Company will continue its focus with Central Falls, East Providence, Pawtucket, Providence, and Woonsocket, communities with lower participation rates (some towns have participation rates at fewer than 5 percent of accounts, while other communities have participation rates upward of 30 percent) and will conduct additional outreach and engagement in those communities. Some of the communities may be further tailored to align with federal Justice40 communities. The Company will continue to deliver innovative strategies to increase customer participation and reach customer segments that are historically underrepresented. Also, the Company will continue to track participation trends and will again provide a detailed analysis in its 2023 Year-End Report showing additive and cumulative portfolio participation. The Year-End Report also captures energy efficiency spending by ZIP code where additional spending on programs can be tracked.

Each program described in this 2024 Plan seeks to drive customer participation to deliver the benefits of energy efficiency to customers throughout Rhode Island. The Annual Plan is designed to provide equitable access to savings and programs across sectors and market segments. For 2024, the Company will continue to plan and report participation in ‘net’ terms, which takes into account free-ridership and spillover, which are commonly referred to as net-to-gross factors. This method of accounting for participants aligns participation numbers with energy savings numbers, which are already recorded in net terms. This approach provides a more accurate connection between

Commented [RF127]: We should cease incentives for all fossil fuel equipment. Is this for oil and propane too? We definitely shouldn't be incentivizing that equipment.

Commented [RIE127R2]: There are no incentive for oil or propane heating or hot water systems. There are incentives for oil/propane weatherization, smart thermostats, and water savings measures.

Commented [GR128]: Good, but is this at all discussed in Attachment 1?

Commented [RIE128R2]: Yes

Commented [GR129]: What is the role of AMF in "optimizing electric versus gas"? What does this mean?

Commented [RIE129R2]: Removed. Was a holdover from a prior draft.

Commented [SR130]: This language is vague and hard to draw conclusions from. 'investigate right-sizing...and options for optimizing' does not offer much information about what changes may take place. Strongly encourage increasing the detail and level of clarity around this commitment.

Commented [RIE130R2]: Removed. Was a holdover from a prior draft.

Commented [GR131]: Not clear where HVAC and Hot Water fall into these silos

Commented [RIE131R2]: Those measures are included in several programs highlighted in the outreach approaches described in this section. What sort of information would provide clarity?

Commented [ML132]: Needs to be culturally sensitive. Please don't just translate an English campaign into these other languages.

Commented [RIE132R2]: Noted

Commented [RIE133]: Steven Chybowski: That's helpful tracking to identify geographic areas for focus

Commented [RIE133R2]: Noted

Commented [SR134]: Appreciate and agree with this reporting approach, though gross participation could be interesting to see as an additional data point.

Commented [RIE134R2]: Thanks for the comment.

energy savings and the number of customers who benefit from efficiency programs. Planned participation estimates are included in Attachment 5: Electric EE Program Tables, Table E-7 and Attachment 6: Gas Energy Efficiency Program Tables, Table G-7.

Table 4 below describes the definitions for how RI Energy projects, tracks and reports participation in the efficiency programs.

Table 4. Participation Definitions

Fuel	Sector	Program	Participation Unit	
Natural Gas	C&I	Large Commercial New Construction	Unique Account	
		Large Commercial Retrofit	Unique Account	
		Small Business Direct Install	Unique Account	
		C&I Multifamily	Housing Units	
	Income Eligible Residential	Single Family – Income Eligible Services	Income Eligible Multifamily	Housing Units
			ENERGY STAR HVAC	Unique Account
	Residential	Single Family – Income Eligible Services	EnergyWise	Unique Account
			EnergyWise Multifamily	Housing Units
			Home Energy Reports	Unique Account
			Residential New Construction	Housing Units
			ENERGY STAR HVAC	Unique Account
	Electric	C&I	Large Commercial New Construction	Unique Account
			Large Commercial Retrofit	Unique Account + Unique Customer names from Upstream Lighting
Small Business Direct Install			Unique Account	
Income Eligible Residential		Single Family – Income Eligible Services	Income Eligible Multifamily	Housing Units
			ENERGY STAR HVAC	Unique Account
Residential		Single Family – Income Eligible Services	EnergyWise	Unique Account
			EnergyWise Multifamily	Housing Units
			ENERGY STAR HVAC	Unique Account

Commented [GR135]: The rationale for this isn't clear. Nor does it appear to make sense, but maybe it's not being explained thoroughly.

So, if 100 customers get a dehumidifier which has a 50% NTG, then RIE only claims 50 participants?

Commented [CJ135R2]: Should report both gross and net customers.

Commented [RIE135R3]: Could you please explain the benefit of reporting both gross and net customers?

Field Code Changed

Fuel	Sector	Program	Participation Unit
		Home Energy Reports	Unique Account
		Residential New Construction	Housing Units
		Residential Consumer Products (formerly ENERGY STAR Products and ENERGY STAR Lighting)	Number of Rebates

The Company will estimate the number of unique participants for each program. For some programs such as ENERGY STAR HVAC, one measure does not necessarily equal one participant as a customer can purchase more than one measure. Therefore, the Company also considers the previous year’s unique accounts-to-savings ratio in order to estimate the planned unique participants in 2024. This method allows for a better estimation of unique participants but can make it more difficult to compare planned numbers across years.

RI Energy is in the process of updating its website to transition away from the structure used by National Grid. Updates to all web pages, including those for energy efficiency programs, are in process. The beta site is being reviewed by internal stakeholders and user experience experts, as well as being tested by customers. The website will adhere to best practices for accessibility. The Company is targeting a roll out of the new website in Q2 of 2024.

2.7 Equity

The Company defines equity in its energy efficiency programs as ensuring that all customers have equal ability to access and benefit from its programs, regardless of their geographic location in Rhode Island, income, home ownership status, primary language, business size, or other attributes. This involves considering how programs are designed and evaluated with this definition of equity in mind, as well as taking into account the systemic and institutional structures that may make it easier for some customers to access energy efficiency products and programs more than others. The Company began a deeper dive into equity in 2021 with participant and non-participant research to quantify gaps in participation. In 2022, the first year of the EWG was initiated jointly with the OER so the Company could listen to the voices of advocates serving underserved communities. As a result of the EWG, metrics were developed and have been refined. The Company is committed to continuing its equity outreach and engagement and building upon efforts that began in 2022 and continued expansion in 2023.

The Company is committing to at least 6 EWG meetings in 2024. We will spend Q1 of 2024 focused on metrics and reporting for equity. We may opt to create a temporary sub-committee of the EWG to help workshop and find

Commented [GR136]: This seems out of place here.

Commented [RIE136R2]: Noted.

Commented [RIE137]: Steven Chybowski: That sounds fun! Will OER or other stakeholders be able to get a preview of the new campaign in advance?

Commented [RIE137R2]: To be addressed

Commented [SR138]: As noted earlier, defining equity in terms of access is incomplete, hard to measure, and does not necessarily drive equitable outcomes (though access is a step along that path, it is not the end of the path). Suggest re-defining equity to emphasize program outcomes, rather than program access.

Commented [BF138R2]: We want to comply with the LCP Standards, but please suggest some specific outcomes to consider

Commented [SR139]: There have been a variety of substantive critiques and constructive criticism offered regarding how equity performance is measured that have, by and large, been unaddressed by the Company. Addressing this type of feedback should be an area of critical focus for 2024 equity efforts.

Commented [BF139R2]: See paragraph added below that outlines a process for 2024

agreement on metrics, based in part on discussion, negotiation, and the metrics suggested by stakeholders in response to our 2024 Annual Plan. Metrics will need to balance stakeholder input with what is feasible and reasonable from the programs' perspective. The intent would be to have a set of agreed upon metrics by the end of Q1 2024, along with reporting templates and reporting systems / personnel figured out from the Company's end. The first equity metrics report will be issued along with the Company's other Q2 reports.

It is only through consistent and ongoing action that the disparity can be addressed. The energy efficiency non-participants have a much lower awareness of energy efficiency than participants. By continuing engagement with community organizations that have the trust of non-participants, working to remove barriers to participation, and collaborating with other equity efforts, the Company strives to make continuous progress.

The 2022 metrics that are currently planned to will be reported on in 2024 include:

- Spending by ZIP code reported in the Energy Efficiency Year-End Report.
- Assessment and weatherization participation by town reported for Q2 2022 and Q4 2022.
 - Single-family participation in EnergyWise and IES Programs by town.
 - EnergyWise and IES Program single-family owner versus renter information.
- Energy efficiency outreach and education with other community organizations.

The 2023 metrics activities that will continue in 2024 include:

- Continue cross training of customer advocates, CAP agencies, other home-visiting programs to better understand available programs and services for both energy efficiency and health/well-being.
- Hosting "office hours" or tabling events to answer questions and make connections with customers.
- Focus on non-participant, equity communities of Central Falls, East Providence, Pawtucket, Providence, and Woonsocket.

The Company's energy efficiency equity work is also focused on ensuring qualified customers are moved to the discount rate. Even with community organizations that provide space to educate their customers about energy efficiency, the priority of these organizations is to assist customers with billing questions and payment plan opportunities. Not surprisingly, the immediate bill relief from the discount rate removes some financial pressure and

Commented [AC140]: Spending for Community-Based Initiatives reduced significantly according to the Attachments 5/6. What is the reason for this change and how will the reduced spending impact these community-focused efforts?

Commented [FB(E140R2)]: We have engaged with 5 communities in 2023 with extensive outreach. In 2024, we will focus on East Providence as a community to engage

Commented [SR141]: See comments on specific metrics elsewhere throughout document. These are clearly not enough, the EWG should be much more proactively engaged here, and outcomes need to be a focus, not just spending/marketing efforts.

Commented [SE141R2]: See paragraph inserted above about 2024 plan for metrics

Commented [RIE142]: Acadia Center (summarized):

Geographic Categorization:

Acadia Recommends that the company present and categorize EE data by geographic areas which have more meaning than CDPs or zip code. By narrowing down and consolidating reporting metrics by more meaningful geographic areas, the company should also commit to reporting on these metrics on a consistent quarterly basis. Geographic categorization may also be informed by the ability of the company to establish informed annual targets for those areas.

Acadia center suggests the following geographic categorization on EE data:

- Municipality would allow for coordination with municipal level programs or outreach, and avoid any confusion around the accounting for villages within RI municipalities
- Divide the state by outreach service areas (CAPP agencies), which may inform targeted funding and outreach.
- Identify environmental justice areas in order to generate and compare rates of participation for EJ and non-EJ areas
 - Once EJ areas have been isolated, a simple target could align with Justice40. For example. Aim to have at least 40% of assessments and 40% of weatherization performed in EJ communities.

The company should include specific, measurable metrics and targets in its 2024 annual plan. The # of home energy assessments/weatherization hold little meaning without referral to the size of the geographic area, number of eligible customers, and a target/goal for the year.

... [70]

Commented [FB(E142R2)]: See paragraph added above that outlines a process for 2024 to determine metrics. We will engage with individual stakeholders to get input as well.

Commented [ML143]: multifamily should be reported as well

Commented [FB(E143R2)]: We will determine what reporting is feasible for multifamily

Commented [RIE144]: Steven Chybowski: I don't think the list below are "metrics." Does this need to be re-labeled?

Commented [FB(E144R2)]: changed

concern from an energy burdened population. Direct face-to-face contact with Customer Advocates also builds customer trust. Once that trust is established, it is easier to move the attention of customers to energy efficiency.

In 2023 the Company began to engage with the Rhode Island Department of Health Equity Zone Initiative through a connection facilitated by the EERMC.²⁸ The Health Equity Zone initiative supports place-based approaches to promote healthy communities and improve the socioeconomic and environmental conditions in neighborhoods across Rhode Island. There are 15 Health Equity Zone collaboratives across the state and each zone is overseen by a backbone agency. The Company has previously engaged many of these agencies through the Weatherization Program and the Health Equity Zone initiative provides an additional opportunity to work with agencies that serve residents who have not historically participated in the Company's energy efficiency programs. In 2024, the Company will continue to participate in Health Equity Zone events and collaborate with backbone agencies to increase awareness of efficiency offerings.

The Company's 2024 equity efforts will focus on four areas:

1. **Demonstration Assessment with non-profit organizations with outreach.** An Energy Efficiency Equity Demonstration Residential Equity Outreach Assessment will be developed to engage non-profit organizations in providing direct outreach to landlords in one or more of the five equity communities. The EWG has apprised us of increasing demands placed on non-profit organizations from stakeholders frequently requesting additional outreach with no additional funding. The Energy Efficiency Equity Demonstration Residential Equity Outreach Assessment would work with a handful of stakeholders to provide direct outreach and education to landlords within the five equity communities. The Company will be working with EWG stakeholders to develop best understand how to engage with non-profits and the funding structure for participation. For additional detail, please see Attachment 8.
2. **Justice40 Initiative focus.** The Company will continue with reporting on existing equity metrics while working with the EWG and OER to fine tune and align reporting metrics to be aligned with Justice40 Initiative reporting by OER. Justice40 is a federal investment in climate and clean energy benefits to disadvantaged communities. The federal government is seeking to provide at least 40 percent of overall benefits to the defined

Commented [ML145]: I'm not sure I've seen a description in here of what the Energy Advocates do.

Commented [RIE145R2]: See footnote

Commented [RIE146]: Steven Chybowski: Is there ongoing HEZ coordination going on beyond the August event? Two things: 1) If this engagement began with the August HEZ event, it may be considerate to note the EERMC's role in developing that connection as their sponsored public forum for 2023. 2) If the Company is doing more coordination with the HEZ's, more detail about what that looks like would be appreciated. I just want to be fully aware of what that looks like and if OER can be helpful in any way, please don't hesitate to loop us in.

Commented [RIE146R2]: Updated. No concrete plan for further collaboration at this time but would be helpful to connect with OER around additional opportunities to engage with the HEZ initiative.

Commented [SR147]: think this is a great step for the program's equity efforts.

Commented [RIE147R2]: Thanks for the comment.

Commented [AC148]: Please tabulate the information below for inclusion in the Plan and ongoing data reporting (understand that some granular reporting may take time to develop as part of the Small Biz Participation Dashboard)

Recommended C&I Equity-focused metrics/data reporting:

- Total eligible SBDI customers by zip code ... [71]

Commented [FB(E148R2): We will work on data reporting formatting

Commented [SR149]: What about offering funding directly?

Commented [FB(E149R2): We will offer direct funding

Commented [SR150]: When will this collaboration with EWG take place? Hopefully before next summer.

Commented [FB(E150R2): We have presented the concept at the EWG, will have ongoing discussions, and will proceed u... [72]

Commented [RIE151]: Acadia Center: Funding community partners to conduct EE education and outreach has been a ... [73]

Commented [FB(E151R2): Refer to Attachment 8 for more detail on the initiative

Commented [SR152]: This sounds interesting, but the description here seems to be that the company will consid... [75]

Commented [DB152R2]: This idea was presented to the EWG with more specifics on 8/30 and received feedback from ... [74]

Commented [DB152R3]: Please refer to attachment 8 for more details.

Commented [RF153]: Any goals for increasing participation in disadvantaged or environmental justice communities?

Commented [FB(E153R2): We will get a baseline of data in 2024 and report on it to assess future goals

²⁸ State of Rhode Island Department of Public Health, "Health Equity Zones."

communities. Reporting on the Justice40 communities allows the Company to highlight its energy efficiency programs' benefits in the overall national efforts. Residents in these communities will hopefully also experience an additive impact in benefits with multiple clean energy and energy efficiency efforts focused on these communities.

Commented [GR154]: How does this align with our historic efforts at sector parity; at least for budgets? Do we need to align?

Commented [FB(E154R2)]: This is a federal requirement; we will have to assess how it aligns with the RI population and with LCP Standards

3. **Awareness education on Latina radio.** In 2024 there will be a new energy efficiency marketing campaign in Rhode Island and the Company will work to expand the education to a Latina radio station in Spanish. Engagement with the Latina community has made the Company aware that radio is a preferred resource for relaying community information as opposed to print and email formats.

4. **Removing barriers to participation.** A large barrier to participation comes in the form of income verification. The Company was fortunate to provide self-attestation based, moderate income, defined as 60-to-80 percent State Median Income, no-cost weatherization services through RGGI supported funding from OER. This opportunity allowed the Company to serve customers and then determine whether these customers were considered moderate income after their participation. The Company proposes continuing to serve customers with either a self-attestation method or no qualification if they live within a Justice40 designated community.

Commented [SR155]: Agree this is a preferred approach. Encourage the company to proactively consider IRA requirements and how to integrate meeting those requirements to leverage those funds without losing the simplicity of the current approach

Commented [RIE155R2]: Noted.

Commented [RF156]: What are the plans for addressing this large issue with the coming IRA funds that will need to be income verified? How to coordinate with OER on developing a statewide system?

Commented [TE156R2]: The Company will work with OER to coordinate with regards to income verification requirements.

Section Three: Demonstrations, Pilots, and Assessments

Commercial, industrial, and residential demonstrations, pilots and assessments are all vehicles that may be used to identify, test, analyze, and deliver new innovative solutions and services that are technically feasible, desirable by customers, and viable for inclusion in the portfolio. The Company will continue to systematically review opportunities to add to the portfolio through a consistent and transparent process. Please refer to Attachment 8 for additional details on evaluations for demonstrations, pilot, and assessments. Consistent with PUC Guidance, the Company uses the following definitions for demonstrations, pilots and assessments.

3.1 Definitions

Demonstrations

A demonstration will test the feasibility of a new product or offering for inclusion in existing programs. It is generally expected that demonstrations will be less time and resource intensive than pilots, since generally there is greater

certainty around a narrow, incremental idea added to a program rather than a totally new set of offerings. Savings associated with demonstration projects may contribute to shareholder incentives. Demonstrations may be evaluated with either an independent or a vendor evaluation.

Pilots

A small-scale, targeted program that is limited in scope, time, and spending and is designed to analyze the feasibility of a future program or rate design. Pilots are designed to test technologies and approaches to energy management not included in the core energy efficiency programs that could potentially become a new, standalone program. Given the scope of adding a new core program to the Company Energy Efficiency Portfolio, it is likely that pilots will require a long-term commitment and broader set of stakeholder input. Savings associated with pilots will not contribute to shareholder incentives. Pilots may be evaluated with either an independent or a vendor evaluation.

Assessments

An assessment will be deployed for solutions that address a particular gap or program need but have significant uncertainty around the effectiveness or potential of the solution to realize savings. Because of the uncertainty, assessments will not include field demonstrations or customer installations. Instead, assessments will focus on information gathering to equip Company staff to make a more informed decision of whether and how to proceed with the idea. It is possible that an assessment could recommend further demonstration of the idea or determine the solution should exit the review process. Savings associated with assessments may not contribute to shareholder incentives. Assessments may be evaluated with an independent evaluation, vendor evaluation, or internal review.

The Company will coordinate efforts with internal and external stakeholders, such as EM&V, Customer Energy Management, the OER, and the EERMC, at various points in the development process to ensure appropriately rigorous evaluation and attention is given to each demonstration, pilot and assessment. Updates will be provided to OER and the EERMC consultant team on a quarterly basis and the Company will solicit input during its collaborative annual planning process.

2024 Demonstrations, Pilots and Assessments

The 2024 Plan includes funding for three demonstrations and assessments (see Attachment 8 for greater details). The Company also recognizes the need to stay abreast of relevant technological and policy innovations in energy efficiency.

RI Energy is a member of several organizations that foster collaboration among efficiency program administrators and provide ongoing insights into emerging opportunities that support the efforts of the Company to deliver energy efficiency solutions to customers. These include the Electric Power Research Institute, ESource, Northeast Energy Efficiency Partnerships, and the Consortium for Energy Efficiency.

Commented [GR157]: This is the only one of the 3 discussed in the DPA Attachment. Are the other two actually relevant to a discussion of DPAs?

Commented [RIE157R2]: All are a source of ideas for program improvements and potential DPAs.

3.2 Multi-year Strategies

In the LCP Standards adopted by the PUC in Docket 23-07-EE, the PUC directs the Company to identify investment strategies for which implementation and budget requests (or revenue collection) are expected to span multiple years. In addition to the budgets and targets required for the rest of the portfolio, the PUC directs that the Company may separately provide budgets and goals for multi-year strategies. The requirement applies to both the Annual and Three-Year Energy Efficiency Plans. There is no such multi-year commitment envisioned for 2024.

Section Four: Coordination with Other Programs and Policies

Continuing to provide the best value to Rhode Island customers necessitates that the Company coordinate with other parts of the energy system, rather than pursuing savings programs and strategies in isolation. For this 2024 Plan, the Company highlights specific ways in which it plans to implement its Energy Efficiency Portfolio in coordination with other Company filings and activities, as described below. Efforts have also been taken to ensure the Annual Plan is aligned with relevant state policies and objectives and specific coordination opportunities are identified below.

4.1 Other Programs and Policies

4.1.1 System Reliability Procurement

There are two points of integration between energy efficiency and system reliability procurement. First, while the demand response program had historically been housed within the energy efficiency program, demand response will now be integrated into system reliability procurement (see the forthcoming 2024-2026 System Reliability Procurement Three-Year Plan for more information). While the program will maintain its core design, its new home within system reliability procurement will prompt additional coordination between energy efficiency program staff and system planning team members. This coordination includes, but is not limited to, supporting market engagement efforts for non-wires and non-pipes solutions, conducting locational outreach for energy efficiency measures that may preemptively alleviate grid needs to some extent, and supporting internal evaluation of energy efficiency as a non-

wires or non-pipes solution. The Company will coordinate internally through overlapping staffing assignments and anticipates support for coordination through external stakeholder engagement.

Second, energy efficiency may be a potentially viable solution to system needs. The system reliability procurement process evaluates the ability of energy efficiency to resolve system needs either partially or fully in a manner that less than the cost of the best alternative utility reliability procurement solution. In this manner, energy efficiency coordinates with system reliability procurement to potentially mitigate specific system needs as they arise.

4.1.2 Advanced Metering Functionality and Grid Modernization

The increased availability of more near real-time customer energy usage data, if enabled by AMF deployment, will allow for enhancements to energy-efficiency program design and implementation. Currently, the Company's plan for AMF meter deployment if approved begins with a "Solution Validation" phase, installing approximately 500 meters starting in late 2024, followed by continual deployment expected to go through the end of 2025/early 2026. Therefore, this Annual Plan does not include activities that rely on AMF. However, throughout 2024, the Company will identify activities which may help lay the groundwork for implementing program enhancements which AMF will enable in future years. The intent of such activities would be to increase participants', stakeholders', and the Company's **comfort and familiarity with targeted programs and pay-for-performance (P4P) programs.** As these are foundational program enhancements enabled by AMF, laying the groundwork for these concepts in 2024 should help facilitate a smooth implementation of AMF-enabled enhancements once they are available.

4.1.3 2021 Act on Climate

The Act on Climate sets mandatory, enforceable, statewide, economy-wide greenhouse gas emissions reduction targets of 10 percent below 1990 levels by 2020, 45 percent below 1990 levels by 2030, 80 percent below 1990 levels by 2040, and net-zero emissions by 2050. The Company is actively participating in the ramp up to the *2025 Climate Strategy*, having submitted comments to the State's Request for Information to Support the Development of a Scope of Work for the Climate Action Strategy. The energy savings achieved by RI Energy's efficiency programs directly advance priority actions identified by the EC4 in their *2022 Climate Update* to the *2016 Greenhouse Gas Emissions Reduction Plan*.

The *2022 Climate Update* included several priority actions that inform the initiatives outlined in the 2024 Plan, specifically:

- **Priority Action for the Electric Sector: Continue Energy Efficiency Work**

Commented [RIE158]: Steven Chybowski: Does AMF also better enable "measured" energy savings as opposed to "modeled" energy savings?

Commented [RIE158R2]: Good question. Not clear yet to us the extent to which near real time data would impact the accuracy of measured savings.

Commented [GR159]: Can there be a more explicit commitment here to electrification and promotion of HPs, HPWHs and other fuel switching activities, even given current regulatory constraints?

Commented [RIE159R2]: Perhaps the DSM plan would be a more appropriate place for that discussion.

- This Annual Plan addresses key items highlighted in this action item and will lower energy bills, reduce greenhouse gas emissions, and support local and state economies.
- **Priority Action for the Thermal Sector: Continue Energy Efficiency Programs and Weatherization**
 - Weatherization programs remain a focus of both Residential and 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.
- **Priority Action for the Thermal Sector: Target 15% Penetration of Energy Efficient Electric Heating by 2030**
 - This Annual Plan continues the Company efforts to support the adoption of electric heating, with a particular emphasis on electric resistance heating customers.
- **Priority Action for the Thermal Sector: Efficient Heat Pump Incentives**
 - Several programs outlined in this Annual Plan 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.

This Annual Plan directly advances greenhouse gas emissions reductions through energy savings. Tables E-6A and G-6A in Attachments 5 and 6 include the projected carbon reductions from the 2024 Plan.

4.1.4 Coordination with State and Federal Incentive Programs

In 2024, the Company will coordinate with OER on its new \$25 million Clean Heat RI Program to facilitate the customer experience, ensure that all available incentives are communicated, and explore synergies in implementation. The Clean Heat RI Program will include funding for fuel switching and will complement RI Energy's efforts to promote efficient heat pump adoption for residential, low-income and small commercial customers. As indicated in section 2.3 of this Annual Plan, the Company will work with OER to complement the federal funding they will make available for home efficiency improvements. Section 3.4.6 of the 2024-2026 Plan contains additional detail regarding the Company's plan to prepare for the influx of federal funding.

Commented [RF160]: Mention IRA now that the guidelines are out and we know the \$ amount for RI? How will you coordinate and help OER plan and stack the funding?

Commented [TE160R2]: Please see 3YP.

4.1.5 New Codes and Standards

In January 2023, the Rhode Island House of Representatives passed legislation, [H6101/S0855 Sub A](#), requiring the state to adopt the 2024 International Energy Conservation Code (2024 IECC) within three months of publication.²⁹ The law requires adoption of the 2024 IECC with no weakening amendments as well as the creation of a plan for 90 percent compliance within six months for residential and commercial new construction and renovation projects. These residential code changes will most likely shift the new construction and renovation industry away from prescriptive pathways toward a performance-based pathway for compliance (i.e., energy ratings) and as a result, more Home Energy Rating System (HERS) Raters will be needed. The Company will increase trainings to support code compliance. **To support this increase, the Company and OER will leverage IRA funding that assists states in adopting the 2024 IECC and/or a zero-energy code, as well as implementing a code compliance plan. OER will be responsible for administering this funding and the Company will work closely with the agency to support code training efforts.**

Commented [GR161]: But there does not appear to be any explicit codes and standards advocacy work and 2024-specific support work. Will any of these C&S efforts support savings claims? Which do show up in the Attachment 1 measure tables?

Commented [ME161R2]: The Company does not participate in code advocacy, but supports analysis of codes and training to enhance code adoption/compliance/enforcement. Savings are currently claimed for code compliance through the Company's Code Compliance Enhancement Initiative (CCEI), which is discussed in Attachments 1 and 2. Additionally, the Company will continue to claim savings for new construction measures which exceed code-minimum baseline assumptions.

Commented [RF162]: This is aggressive. This is a piece of work. Will RIE claim savings for supporting this transition? This might be a good opportunity for additional program savings.

Commented [ME162R2]: Savings are currently claimed for code compliance through the Company's Code Compliance Enhancement Initiative (CCEI), which is discussed in Attachments 1 and 2. Additionally, the Company will continue to claim savings for new construction measures which exceed code-minimum baseline assumptions.

4.1.6 Future of Gas

The PUC Docket 22-01-NG Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island is underway with regular meetings of the established stakeholder committee; the expected kickoff of the technical analysis expected in the fall and a policy development phase to follow in 2024 informed by the results of the technical analysis. As such, the outcomes of the Future of Gas docket are unlikely to impact the 2024 Plan although the Company expects to have better visibility into future decarbonization pathways in light of this docket to inform subsequent annual plans.

Section Five: Evaluation, Measurement, and Verification

EM&V provides independent verification of impacts to ensure that savings and benefits claimed by the Company through its energy efficiency programs are accurate and credible. EM&V also provides insight into market characteristics and guidance on program design to improve the delivery of cost-effective programs.

²⁹ The 2024 IECC is expected to go into effect in January 2024.

To verify the impacts of programs on energy savings, the Company hires independent third-party consulting firms to regularly conduct evaluation studies as part of its EM&V process. These evaluations incorporate industry standard methods such as engineering analysis, metering analysis, billing analysis, site visits, surveys, and market studies to realize the actual energy savings of a measure. The EERMC and OER provide direct oversight of each evaluation study conducted. Every year, the results of the studies are used to update the benefit-cost calculations during planning.

Attachment 3: EM&V Plan lists the evaluations that have occurred since 2010 that are still being used and their influence on program planning. All completed evaluations are submitted electronically to the PUC; final reports of evaluations completed in prior years are available in the dockets for previous years, on the EERMC website, or upon request.

Additionally, the 2024 EM&V Plan is presented in Attachment 3 and includes brief descriptions of each of the proposed studies. The areas proposed for study in 2024 were chosen based on several factors: the relative amount of savings in that program or end use, the vintage of the most recent evaluation study, the relative precision of the recent evaluation study, recommendations from previously completed studies, and the available evaluation budget. This list may be added to as the year progresses, and different evaluation priorities are identified. In particular, the Company will consider the value of using evaluations from other jurisdictions as well as adding Rhode Island-specific impact or process evaluations, as appropriate, that will help inform the Company's efforts towards achieving the goals of least cost procurement.

Section Six: Consistency with Least Cost Procurement Standards

This Annual Plan is submitted in accordance with the Least Cost Procurement Law, R.I. Gen. Laws § 39-1-27.7, the basis for which is the *Comprehensive Energy Conservation, Efficiency, and Affordability Act of 2006*, R.I. Gen. Laws § 39-2-1.2, and the LCP Standards as approved and adopted in Docket No. 23-07-EE in July 2023. The Standards guide how energy efficiency services are delivered in a manner that is optimally cost-effective, reliable, prudent, and environmentally responsible. The Company has assessed each of these requirements in developing this Annual Plan. Details on the Company's approach to considering each of these elements are included in this section. In addition, further detail on the cost-effectiveness screening of the proposed investments is in Attachment 4: RI Benefit Cost Test, with detail on rate and bill impacts in Attachment 7.

Commented [AC163]: Recommend adding specific guidelines for this oversight. Some details are included in attachment 3, but the Plan should describe things like how long the EERMC/OER have to review specific studies. Requests for accelerated review are sometimes necessary, but not appropriate for major studies with detailed reports to vet

Commented [RIE163R2]: RIE will work with consultants to develop general guidelines but declines to put them in the plan

6.1 Cost-Effectiveness

6.1.1 Interpretation of Standard

The RI Test compares the present value of the total lifetime benefits derived from efficiency savings to the total costs of acquiring those savings (i.e., program and customers' costs). According to the Standards, "any program with a quantified benefit-cost ratio greater than 1.0 (i.e., where quantified benefits are greater than quantified costs), should be considered cost-effective. Consistent with the PUC's guidance issued in Docket No. 4600, qualitative benefits and costs may be considered in determining cost effectiveness. The portfolio must be cost effective, and programs must be cost effective."³⁰

In Docket 23-07-EE, changes to the Standards required the following:

- An additional view of cost effectiveness that, "for categories with value or cost that is shared between Rhode Island Energy and other jurisdictions (both within the state and region), presents only those benefits and costs that will be allocated to Rhode Island Energy." For this analysis, the Company has identified certain categories of benefits that flow outside of Rhode Island. These include a portion of demand reduction induced price effects (DRIPE) and pool transmission facility (PTF) capacity values. Attachments E-5B and G-5B present the requested additional view that shows that programs are still cost effective absent these benefits. To the best of the knowledge of the Company, no costs accrue outside of Rhode Island.
- The "RI Test shall include the costs of carbon dioxide mitigation as they are imposed and are projected to be imposed by the Regional Greenhouse Gas Initiative, Rhode Island Renewable Energy Standard and Rhode Island Act on Climate..." In consultation with the OER, EERMC, and Division, a value and approach for carbon dioxide mitigation was developed which is used in all cost-effectiveness analyses in this Annual Plan. This approach is to use the Marginal Abatement Cost values from the 2021 AESC study in the analysis, while parties await resolution of the Future of Gas docket.

Commented [CJ164]: No footnote?

Commented [RIE164R2]: Footnote added.

Commented [CJ165]: The attachments shared do not appear to differentiate between benefits accrued in RI (or RIE) vs. outside RI (or outside RIE). They just show total benefits.

Commented [RIE165R2]: This was not included in August 4 version, It is now included

²⁸ [LCP Standards](#), section 3.2N.

6.1.2 Compliance with Standard

The Company has analyzed the cost effectiveness for the proposed 2024 Portfolio and programs using the RI Test as required by Docket 4600 and the LCP Standards. The Energy Efficiency Portfolio and programs proposed for 2024 satisfy these criteria for cost effectiveness.

As provided for in the Docket 4600 RI Test Framework, benefits include primary fuel energy savings (electricity and natural gas), the value of other resource (fuel and water) benefits, price effects, non-embedded greenhouse gas reduction benefits, non-embedded NOx reduction benefits, the value of improved reliability, and non-energy impacts (NEIs). Costs include all projects costs, program planning and administration, sales, technical assistance and training, evaluation, and the performance incentive. To illustrate the detailed components of the RI Test as well as the sources of the values, the Company has provided Attachment 4: RI Benefit Cost Test. The RI Test as applied to the 2024 Plan utilizes the regional avoided cost study, referred to as AESC 2021, completed by Synapse Energy Economics in May 2021 that provided the monetization of most benefit categories. The monetization of benefits also incorporates the latest EM&V results that affect claimable savings in the programs. Attachment 4 provides additional detail on changes in the avoided costs.

Attachment 5, Table E-5 shows that the proposed portfolio of electric programs is expected to have a benefit-cost ratio of 1.70, counting all benefits regardless of the jurisdiction to which they accrue, which means that approximately \$1.70 in monetized lifetime benefits is expected to be created for each \$1 spent on the portfolio. Attachment 6, Table G-5 shows that the proposed portfolio of gas programs is expected to have a benefit/cost ratio of 1.9±2 in the presentation of BCR results, which means that \$1.9±2 in lifetime benefits is expected to be created for each \$1 spent on the portfolio. The tables in Attachments 5 and 6 also demonstrate cost-effectiveness at a program level.

Attachment 5, Table E-5A shows that the proposed Electric Portfolio is expected to have a benefit-cost ratio of 1.476, counting all benefits and costs which accrue only to RI Energy, which means that approximately \$1.476 in monetized lifetime benefits is expected to be created for each \$1 spent on the portfolio. Attachment 6, Table G-5A shows that the proposed Natural Gas Portfolio is expected to have a benefit/cost ratio of 1.901 in the presentation of BCR results, which means that \$1.901 in lifetime benefits is expected to be created for each \$1 spent on the portfolio.

Cost-effectiveness results do not include economic impacts such as employment and gross state product impacts from energy efficiency investments. Per agreement with stakeholders, economic impacts are shown separately from the benefit-cost analysis in Attachment 5, Table E-5B (Economic Benefits) and Attachment 6, Table E-6B (Economic

Commented [CJ166]: What about the recent RI Specific update that was just completed?

Commented [RIE166R2]: The Company needs to coordinate use of avoided costs across all programs, including those outside of EE, and consequently has elected to wait for AESC2024

Commented [AC167]: Think the text or a footnote should mention what studies are still in progress and may impact benefits (EWSF impact evaluation, C&I NTG study, C&I kitchen equipment ISP, Custom Gas/Electric impact evaluation)

Commented [RIE167R2]: We feel there is no need to include that detail in the Plan

Benefits). In addition, the RI Test and the Docket 4600 Framework guidance also indicate that categories of the Framework can be considered qualitatively in the assessment of cost effectiveness. When considering the significant economic activity generated directly by the programs, including supporting close to 800 FTEs associated with the programs and more than 1,000 companies involved, as well as non-quantified benefits such as resiliency, a reasonable assumption is that the macroeconomic benefits of the programs are positive and potentially significant and, were those benefits included in the RI Test screening as quantified benefits, the programs would achieve more favorable benefit-cost ratios.

6.2 Reliability

6.2.1 Interpretation of Standard

The Standards for reliability create an expectation that the Company will be able to deliver the programs described herein and that the savings realized from program delivery are accurately estimated and measured, which ensures that the energy savings described herein can meet reliability standards. In addition, as applicable, programs should be scalable and be tailored to meet specific system needs.

6.2.2 Compliance with Standard

The energy efficiency programs developed under this Annual Plan will continue the Company's extensive history of offering best-in-class offerings to customers. The Company continues to collaborate with a diverse set of stakeholders including the EERMC, OER, Division, and community and advocacy organizations to continually analyze the programs and identify opportunities for improvement.

In building this Annual Plan, the Company's Customer Energy Management team worked closely with industry experts, vendors, and program implementation professionals to assess the current state of existing programs, the potential for program scalability, the economic environment, and the ability to deliver reliable energy savings as a result.

Supporting the Company's efforts to deploy energy efficiency to Rhode Island customers is a robust and long-standing EM&V apparatus, and the resulting robust, verifiable savings ensure this Annual Plan's fulfillment of the requirements of the Reliability Standard. As noted in section 05, the **Error! Reference source not found.** Company hires independent third-party consulting firms to regularly conduct evaluation studies as part of its EM&V process. A distinct group of personnel within RI Energy that includes analysts with specialized skills in engineering, statistics, and economics are tasked with the EM&V function and coordinate all elements of the EM&V process internally and externally. Evaluations

incorporate industry standard methods to assess the actual energy and demand savings of measures incentivized by the programs.

All elements of the EM&V process are closely monitored by the EERMC, their consultants, and OER. The EM&V process is continual, and every year results from EM&V studies are used to update the savings in the benefit cost calculation of the measure, programs, and portfolios. In addition, process evaluations and market studies conducted in the EM&V process provide an independent perspective on the performance of the programs and provide insight into the state of the market and ways that the Company can address new opportunities with its programs.

In total, these EM&V processes provide a transparent, externally vetted approach to ensuring that claimed savings provide as accurate of a picture as possible of the impact of the Company's energy efficiency programs, accounting for spillover, free ridership, and other industry standard adjustment factors. Taken together, this approach complies with the Standard of Reliability.

The EM&V process also supports the Company's participation in the ISO-NE FCM. Passive demand savings achieved via electric energy efficiency and Combined Heat and Power projects, and verified by the EM&V process, continue to participate in the FCM as Passive On-Peak Demand Resources. As detailed further in section 8.2.3, the Company bids the passive demand savings attributed to energy efficiency measures and Combined Heat and Power facilities in the FCM and manages the associated capacity resources to maximize the resulting FCM revenue. The EM&V process provides the necessary verification of claimed savings in order to meet the high standards for participation in the FCM.

6.3 Prudence

6.3.1 Interpretation of Standard

The Company has considered, and continues to consider, several key components in the analysis of prudence. These components can be summarized as considerations about the proposed investments on the following:

- Support for the purposes of Least Cost Procurement.
- Synergy savings through alternatives that meet multiple needs.
- Management of risks to ratepayers and the distribution Company.
- Effective use of funding sources.

- Equitable in the allocation of costs, benefits, access to services, and participation.
- Rate and bill impacts.
- Continuity of implementation efforts.

The Standard for Prudence was clarified regarding equitable access to resources in the revisions in Docket 23-07-EE.

6.3.2 Compliance with Standard

For the proposed investments detailed in this Annual Plan, the Company has assessed each of these elements and how they can be balanced to provide a comprehensive set of programs that will be achievable within known and anticipated constraints.

Purposes of Least Cost Procurement

This 2024 Plan secures cost-effective energy efficiency resources, as detailed in section 6.1.2, to support the electric and gas system through the creation of customer benefits in various components enumerated in both the RI Test, comparison with the Cost of Supply, as well as the Performance Incentive Mechanism.

Synergy Savings

Program design seeks out synergies in customer participation, through a comprehensive view of savings opportunities wherever possible and tiered incentive offers. As an example of the way that the proposed investments in this Annual Plan address multiple needs, the Company will coordinate with the OER regarding engaging customers to weatherize at the same time they are converting to heat pumps.

Management of Risks

Energy efficiency investments are generally low risk investments. Savings have been well researched and documented through evaluation studies and the Company has confidence, based on those studies, that predicted savings will be realized. Continued research through new evaluation studies contributes to continuous program improvement and increasing levels of confidence. Furthermore, many programs include customer education, post-installation inspection, or commissioning to provide a foundation for assumptions about savings persistence. This further reduces risk to ratepayers. Additionally, when the savings are reliably estimated, it serves to increase confidence and reduce risk related to the energy efficiency resource in distribution planning. Finally, by reducing costs and reliance on fuel supply

by reducing demand, energy efficiency can offer some protection and risk reduction associated with market and energy price volatility.

Effective Use of Funding

As described in section 8.2, the Company has identified a number of funding sources to support the Annual Plan budget. Furthermore, several sources of financing are offered to customers to enable program budgets to go further to achieve 2024 Plan targets. Finally, effective use of funding is represented in the mix of measures and incentives planned in order to balance the Portfolio to achieve the Annual Plan's objectives.

Equitable Allocation of Costs, Benefits, Services and Participation

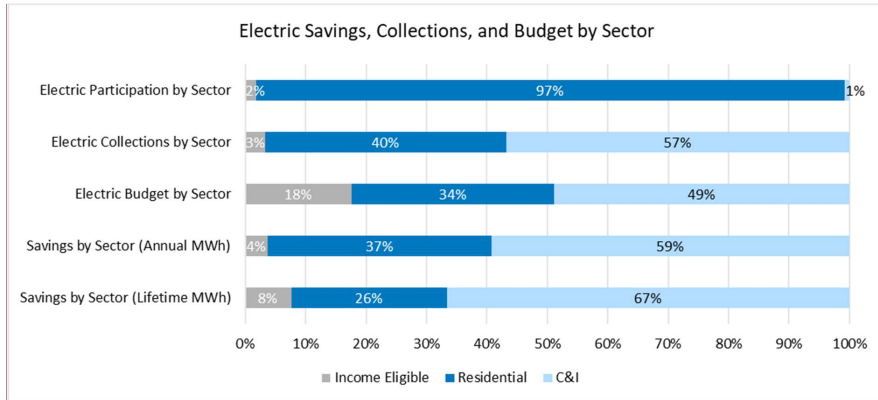
The³¹ Company has assessed

³¹ The equitable allocation of services promotes equity of access or opportunity and is addressed in section 2.6 and other areas of the Annual Plan.

[Figure 3. As shown in Figure 1](#), there is approximate parity between the collections by a customer class and its resulting budget and savings in the Electric Portfolio. The only exception is the income-eligible sector where part of the collections from the residential and C&I customer classes are used to help cover the income-eligible sector funding needs.

The Income-Eligible budget is higher compared to its savings due to several factors: incentives are 100 percent of the cost, the programs are more expensive because they are delivered in-home (compared to at retail sites or via rebates) which requires more labor and management, and the programs have fewer economies of scale (compared to C&I). \$23.5 million is budgeted for the delivery of the gas and electric income-eligible sector programs, 16.5 percent and 21.7 percent of the total funding for each fuel portfolio respectively in 2024. Taken together, these investments represent 17.89 percent of the overall Electric and Natural Gas portfolio budgets.

Figure 3. 2024 Graphical representation of Attachment 5 Table E-1, E-7, and total Electric Savings by Sector, Cumulative

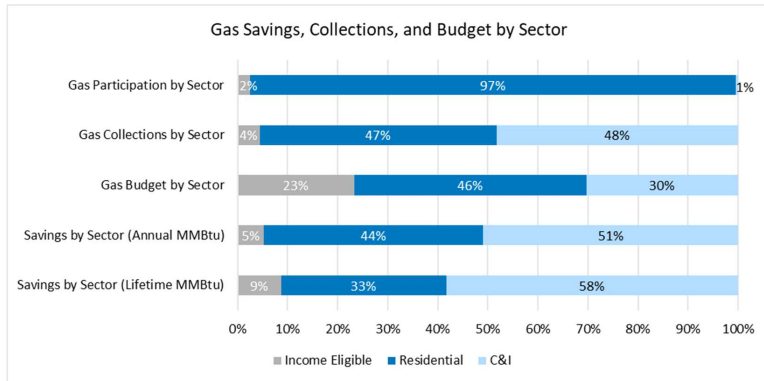


Commented [RIE168]: Glen Reed: IE collections are only 3% of total collections and less than one-tenth of Residential. A little surprised they are that low.

Commented [RIE168R2]: Noted

For the Natural Gas Portfolio, there is also parity between the collections by a customer class and the resulting savings. There is less equitable allocation between budgets and savings. This is due to several factors. First, the energy efficiency program charge varies by customer segment, which changes collections. Second, C&I projects tend to create more savings per dollar. This is due to larger economies of scale, larger projects, different delivery channels that require less labor or management and are more cost-effective, evaluation factors such as free-ridership and spillover, and different customer opportunities. Figure 4 shows the distribution of savings, collections, and budget in the gas portfolio.

Figure 4. 2024 Graphical representation of Attachment 6 Table G-1, G-7, and total Gas Savings by Sector, Cumulative



Given these considerations, as well as the continued interest in supporting income eligible programs, the allocation of costs and benefits is prudently equitable.

Rate and Bill Impacts

The Company has assessed rate and bill impacts of the proposed Electric and Natural Gas Portfolios. Summary results are included in the tables below, while additional details are available in Attachment 7: Rate & Bill Impacts. Electric Programs are projected to usually generate slight upward movement on long-term rates; however, sometimes they generate a reduction in long-term rates. The range of long-term rate impacts is between 0.06 percent and -0.35 percent. For both residential and C&I participants, modeling shows a reduction in bills between 0.53 percent and 21.25 percent. Natural gas programs are projected to generate slight upward movement on long-term rates between 0.01 percent and 0.49 percent. For income-eligible customer participants, small C&I participants, and large C&I participants, modeling shows a reduction in bills between 0.25XX percent and 0.49XX percent.³²

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³² The calculated impacts on long-term rates are not designed to reflect the net increase or decrease to the EE charge from the prior/current energy efficiency plan. Instead, the models calculate the long-term rate impact of the Electric and Natural Gas Energy Efficiency Portfolios by comparing a “No EE” scenario to an “EE” scenario of customer rates. In other words, the “No EE” scenario models rates in the absence of an EE program, and, therefore, contains no EE charge while the “EE” scenario models rates in the presence of an EE program, and, therefore, contains an EE charge. Additionally, long-term rate impacts are captured as a levelized average over the study period rather than a single year.

Table 5 and Table 6 summarize the results of the electric and natural gas rate and bill analyses for the 2024 proposed programs, respectively. All electric sectors, except standard residential, see slight increases in long-term rates.³³ For all sectors, average electric customers see small decreases in overall bills. Furthermore, average electric participants see decreases in their long-term bills. All natural gas sectors see a slight increase in long-term rates due to the 2024 programs.³⁴ With the exception of the large C&I customers, the average gas customer sees a small increase in long-term bills while the average natural gas participant experiences a reduction in long-term bills across all sectors.

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³³ "Long-term" means over the 20-year study period.

³⁴ "Long-term" means over the 25-year study period.

HERs are considered together (Model 2), average participants see ~~4.89XX~~ percent, ~~7.26XX~~ percent, and ~~4.62XX~~ percent reductions in average bills for electric residential, electric income-eligible, and gas customers, respectively. Lastly, when all Residential Programs are considered together including the HER Program (Model 3), long-term average reductions in bills are ~~4.79XX~~ percent for electric, 6.96 percent for electric income-eligible, and ~~0.01XX~~ percent for gas. The Company asserts that this rate and bill impacts analysis demonstrate a prudent investment of ratepayer funds in the pursuit of the objectives of Least Cost Procurement.

The Company has also developed an estimate of the delivered fuel bill impacts experienced by Electric Energy Efficiency Program participants who heat with delivered fuels. While delivered fuels are unregulated, integrating delivered fuel and electric bill analysis provides a sense of the overall impact Electric Energy Efficiency Portfolio has on total bills. See ~~Table 7~~Table 7 below and Attachment 7 for details.

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Table 7. Delivered Fuels and Combined Bill Impacts

Sector	Long Term Average Change in Bills	
	From Delivered Fuels	Total (Electric and Delivered Fuels)
Residential (Participants)	<u>-7.95%</u>	<u>-6.71%</u>
Income Eligible (Participants)	<u>-4.00%</u>	<u>-5.01%</u>

The Company also has assessed the annual change in rates from 2023 to 2024 driven by the funding plan and budgets discussed later in this Annual Plan as another dimension of prudence. ~~Error! Reference source not found, Table 8~~Table 8 summarizes the changes in rates based on the E-1 and G-1 tables.³⁵ While the Company’s proposed budget for 2024 is approximately equal to the budget levels approved in the 2023 Annual Plan, several factors contribute to the change in the energy efficiency charges being negative. The primary factor is the change in the fund balance projection going into 2024 compared to the projection for 2023. Other factors include the budget levels, other sources of funding, and

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³⁵ This analysis uses the rates and electric energy efficiency surcharge in effect for the last 9 months of 2023.

anticipated electric loads and natural gas sales. The changes to annual rates caused by these factors may be considered to be prudent. These elements are discussed further in section 8 of this 2024 Plan.

Table 8. Summary of Changes in Rates between 2023 and 2024

Rate Category	2023	2024	2023 – 2024 Growth
Gas Residential SBC (\$/dtherm)	\$1.136	\$1.095	-3.6%
Gas C&I SBC (\$/dtherm)	\$0.620	\$0.821	32.4%
Electric SBC (\$/kWh)	\$0.00960	\$0.01051	9.5%

Commented [RIE172]: Numbers were updated

Continuity of Implementation Efforts

While not explicitly spelled out in the Standards, the Company has historically considered the continuity of implementation efforts as an element of prudence. Continuity of implementation efforts means changing the scope or scale of programs in a way that is sensitive to maintaining and developing a skilled workforce and receptive to the prevailing economic conditions in the marketplace. The Company generally informs vendors of planned program changes to enable them to prepare their workforce as necessary (for example to ramp up or provide training). The Company also pays attention to this aspect of continuity because, absent continuity, skilled workers may move to other jobs which could result in disruptions of energy efficiency services to customers.

6.4 Environmentally Responsible

6.4.1 Interpretation of Standard

Environmental responsibility includes compliance of the Annual Plan with state policies, particularly pollution reduction. This Standard further requires proper valuation of environmental costs and benefits in this 2024 Plan. Modifications to the Standards in Docket 23-07-EE specify that demonstration of environmental responsibility include an assessment of compliance with state climate policies, and proper valuation of climate costs and benefits, in addition to environmental costs and benefits. The Company’s interpretation of this addition is that, by distinguishing between environmental policies and values and climate policy and values, the Commission intends for the Company to assess the climate impacts of its programs, specifically as they relate to the Act on Climate targets.

6.4.2 Compliance with Standard

The energy efficiency programs and Portfolios described in this Annual Plan are environmentally responsible. As detailed in section [04.3](#), the Act on Climate stipulates mandatory and time-bound emissions reductions for the state.

This Annual Plan seeks to continue the progress that has been made in reducing emissions by providing customers across all sectors with ways to reduce their energy consumption. Energy efficiency therefore contributes directly to meeting the Act on Climate’s goals as well as other environmental policies and priorities in the state. In addition to direct emissions reductions benefits, energy efficiency investments reduce the potential environmental costs and footprint of avoided infrastructure investments and support the ongoing growth and development of a sustainable, green job ecosystem in Rhode Island.

Both the Electric and Natural Gas Portfolios will make a meaningful contribution to reduction in emissions by driving reductions in customer energy usage in both the short and long term. As shown in Attachments 5 and 6, the Electric and natural Gas Portfolios, considered together, will reduce annual emissions by 72,484 short tons of carbon in 2024.³⁶ The values of non-embedded avoided carbon are calculated using avoided cost values determined in AESC 2021 and the AESC Supplemental Study: the non-embedded values of carbon dioxide and nitrous oxide benefits generated by the 2024 Plan over the lifetime of the measures are \$50.3 million and \$3.5 million respectively. These monetized values of emissions are included as benefit streams in the RI Test benefit-cost assessment and in the assessment of cost of supply for the portfolio; however, they are excluded from the calculation of net benefits in the Performance Incentive Mechanism.

The Company’s 2024 Plan complies with, or otherwise advances, the 2021 Act on Climate, which sets statewide, economy-wide greenhouse gas emissions reduction mandates. The proposed investments reduce both electric and gas consumption. On the electric side, prior to meeting the 100 percent Renewable Energy Standard in 2033, any electric savings will directly support the State in meeting its 2030 greenhouse gas emissions reduction mandate through reduced peak demand, which reduces emissions associated with peaker plants, and by ramping up efficiency investments that will help enable the use of more renewables in the future. On the gas side, all gas savings will directly

³⁶ While all energy savings seen in the Annual Plan are net, these emissions are calculated based on gross energy savings from EE measures because meeting the state’s targets does not depend on who is getting credit for the GHG reductions. The marginal carbon emission rates are from “Avoided Energy Supply Components in New England: 2021 Report” Appendix G.

support the State in meeting its 2030 greenhouse gas emissions reduction mandate by reducing emissions associated with customer purchases of gas appliances. Indeed, the State's *2022 Update to the 2016 Greenhouse Gas Emissions Reduction Plan* calls out both electric and gas energy efficiency as a priority short-term action to get Rhode Island on the path to meet the 2021 Act on Climate's 2030 mandate. To properly value the environmental and climate costs and benefits associated with the proposed investment in energy efficiency, the Company used the marginal abatement cost to monetize both embedded and non-embedded value of greenhouse gas emissions reduction.

As noted in section 2.5.2, this Annual Plan includes several activities designed to support upskilling of the green workforce. In providing for these jobs and demonstrating the availability and attractiveness of local, green jobs to Rhode Island's existing and emerging workforce, the Company's energy efficiency programs help to ensure that the local workforce will exist to support the state's environmental policy goals.

Educating and engaging residential and business customers on the potential environmental impacts and benefits of the implementation of energy efficiency measures is a foundational element of the Company's energy efficiency go-to-market strategy and contributes to the environmental responsibility of the Annual Plan. Whether in the form of conveying potential environmental benefits of customer recommendations through Home Energy Reports, EnergyWise home energy assessments, or retail marketing initiatives, or by connecting Small Business audits or large C&I customer sales efforts to business customer sustainability initiatives, the Company's energy efficiency program presence continue to help to support the prominence of environmental issues in customers' minds. Additionally, through the Community Solutions, the Company partners with municipalities and works through local energy and environmental sustainability committees to connect individual customers' energy efficiency decisions and actions to broader municipal sustainability goals and messages. In doing so, the Company's programs continue to link energy savings and efficiency to real and visible benefits for the communities in which their residents and small business reside.

A final component of the environmental responsibility of the Company's 2024 Plan is its ongoing efforts in electrification. The Company will be continuing its efforts to transition electric resistance heating customers to more efficient heat pumps. The Company will also continue to cooperate and coordinate with the OER and others as the state implements its electrification and decarbonization strategies to reach customers that require fuel switching and are ineligible for RI Energy's programs.

Commented [AC173]: Though there isn't specificity on how much DSM programs should "contribute" to state climate goals. Since the 2025 Climate Strategy will likely include this specificity and therefore impact the 3YP, I think the Company should comment on that here. What if the 2025 Climate Strategy assumes a higher level of savings, say closer to the EERMC Targets, in order to meet Act on Climate requirements? Even though that's still technically an unknown, not addressing potential outcomes of the 2025 Climate Strategy seems inappropriate

Commented [RIE173R2]: Subsequent annual plans can address increases, if necessary

6.5 Lower than the Cost of Supply

6.5.1 Interpretation of Standard

In accordance with the LCP Standards, the Company assessed the cost of incremental energy supply and the cost of energy efficiency using all applicable costs enumerated in the Rhode Island Benefit Cost Framework (Framework) approved by the PUC in Docket 4600-A and the Rhode Island Test as described in Attachment 4: RI Benefit Cost Test. This method is substantially the same as that used in the 2023 Plan.

Like the Standard for cost effectiveness, in Docket 23-07-EE, changes to the Standards required an additional analysis of the cost of supply comparison that, “for categories with value or cost that is shared between RI Energy and other jurisdictions (both within the state and region), presents only those benefits and costs that will be allocated to Rhode Island Energy.” In considering the nature of “other jurisdictions,” the Company interpreted this to refer to states other than Rhode Island, and that “Rhode Island Energy” therefore refers, in this case, to Rhode Island. Using this interpretation, the Company identified certain categories of benefits that flow outside of Rhode Island. These include a portion of DRIPE and PTF capacity values. This additional view on the cost of supply will be provided in the final version of the 2024 Plan. To the best of the Company’s knowledge, no costs accrue outside of the state.

6.5.2 Compliance with Standard

For the analysis that includes benefits and costs that accrue only in the Rhode Island Energy jurisdiction, based on the Company’s calculation, the total cost of energy efficiency for the electric portfolio in the is \$114.8 million and the total cost of electric supply to meet the same need would be \$136.2 million. This is a total savings of \$21.4 million over the life of the installed measures from investing in energy efficiency instead of electric supply. The total cost of energy efficiency for the Natural Gas Portfolio is \$41.8 million and the total cost of natural gas supply to meet the same need would be \$51.5 million. This is a total savings of \$9.7 million over the life of the installed measures from investing in energy efficiency instead of natural gas supply. The methodology for calculating Cost of Supply is detailed below.

Commented [RIE174]: Numbers were updated

The RI Test is an appropriate mechanism to determine which costs to include in this assessment. The RI Test, as detailed in Attachment 4, captures the aspects of the Framework that pertain to energy efficiency programs. For the purposes of this assessment, the avoided cost values in the RI Test can also be applied as the costs of procuring additional energy supply. The RI Test also details what is considered a cost of energy efficiency. These are costs incurred by the utility to implement the Annual Plan and the expense borne by the customer for its share of the energy efficiency measure cost.

The Company proposes to use the costs described in [Table 9](#) to compare the cost of energy efficiency to the cost of energy supply. The categories listed in this table are all used in the RI Test, as defined in Attachment 4. As directed by the LCP Standards, the Company provides an explanation for why cost categories are either appropriate or not appropriate for inclusion in the assessment of the cost of energy supply compared to the cost of energy efficiency.

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Table 9. List of the Costs of Energy Efficiency and Costs of Energy Supply

Costs of Energy Efficiency		
Cost	Included (Y/N)	Explanation
Utility Costs	Yes	These costs are incurred to achieve implementation of energy efficiency measures and programs. Includes all costs in Tables E-2 and G-2.
Participant Costs	Yes	Customer contribution to the installation cost of the efficient measure. Customer costs included in Tables E-5 and G-5.

Costs of Energy Supply		
Cost	Included (Y/N)	Explanation
Electric Energy Costs	Yes	Represents the cost of purchasing electric energy supply.
Electric Generation Costs	Yes	Represents cost of generation capacity in ISO-NE.
Electric Transmission Capacity Costs	Yes	Represents Pool Transmission Facilities (PTF) cost.
Electric Distribution Capacity Costs	Yes	Represents the cost of distribution capacity related to increased load.
Natural Gas Costs	Yes	Represents the cost of purchasing natural gas supply.
Fuel Costs	Yes	Non-regulated delivered fuels are an energy supply cost to customers that utilize these fuels for heating. The fuel costs in this category are separate from those embedded in the cost of the electric market. While not a direct cost of electric energy supply, RI Energy includes incentives for delivered fuel energy efficiency measures in its Electric Portfolio. Therefore, to achieve symmetry with costs associated with electric energy efficiency, delivered fuels costs should be included in this comparison.
Water and Sewer Costs	No	While avoided water and sewer costs are a benefit of installing certain energy efficiency measures, they are not a direct cost of energy supply.

Costs of Energy Supply		
Cost	Included (Y/N)	Explanation
Non-Energy Impact Costs	No	With the exception of the three NEIs listed below, while non-energy impacts are a benefit of installing certain energy efficiency measures, they are not a direct cost of energy supply.
• Income Eligible Rate Discount	Yes	- Costs associated with energy being sold at the income eligible rate.
• Arrearages	Yes	- Costs associated with arrearage carrying costs as a result of customers not being able to pay their energy bills.
• Utility	Yes	- Costs associated with utility carrying costs as a result of customers encountering issues with utility services or paying their bills.
Price Effects	Yes	Represents costs associated with the impact of demand reduction on ISO-NE energy and capacity markets.
Non-embedded Greenhouse Gas Reduction Costs	Yes	Represents the social cost of carbon. The social cost of carbon is the cost associated with meeting the goals of the Act on Climate. Carbon emissions come from the production of energy and should be considered a cost of supplying that energy.
Economic Development	No	While economic development is a benefit of investment in energy efficiency measures it is not a direct cost of energy supply.
Non-embedded Nitrous Oxide (NOx) Costs	Yes	NOx emissions come from the production of energy and therefore the health impacts of NOx emissions should be considered part of the cost of supplying that energy.
Reliability Costs	Yes	Increased energy demand can lead to declining reserve margins and decrease reliability so should be associated with the cost of energy.

Assessing the Cost of Supply, the Company applies the above costs of supply to the lifetime electricity, lifetime MMBtu of delivered fuels, demand, and natural gas savings for each measure included in the Annual Plan in present value terms. The costs of the 2024 Plan occur only in the 2024 program year and are therefore not discounted. The results of the Cost of Supply analysis are presented in Table 10 ~~Table 10~~, including the additional intrastate assessment required by the LCP Standards.

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Table 10. Costs of Energy Efficiency and Costs of Energy Supply

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Benefits	Electric	Electric (RI Only)	Natural Gas	Natural Gas (RI Only)
Electric Energy	\$52,169,556	\$33,807,679	\$337,539	\$274,416
Electric Generation	\$4,686,461	\$4,686,461	\$124,249	\$124,249
Electric Transmission Capacity	\$10,016,949	\$1,062,911	\$248,242	\$19,012
Electric Distribution Capacity	\$15,593,731	\$15,593,731	\$282,031	\$282,031
Natural Gas	-\$496,738	-\$496,738	\$28,248,871	\$28,248,871
Delivered Fuel	\$22,530,209	\$22,530,209	\$0	\$0
Price Effects	\$27,013,346	\$27,013,346	\$377,992	\$377,992
Non-Embedded Greenhouse Gas Reduction	\$30,510,102	\$30,510,102	\$19,775,558	\$19,775,558
Non-Embedded NOx	\$1,102,418	\$1,102,418	\$2,380,562	\$2,380,562
Reliability	\$139,433	\$139,433	\$1,010	\$1,010
Income Eligible Rate Discount	\$75,435	\$75,435	\$0	\$0
Arrearages	\$32,064	\$32,064	\$0	\$0
Utility	\$115,675	\$115,675	\$35,514	\$35,514
Cost of Supply	\$163,488,643	\$136,172,728	\$51,811,567	\$51,519,213
Program Implementation Expenses	\$92,563,527	\$92,563,527	\$34,054,990	\$34,054,990
Customer Contribution	\$18,156,328	\$18,156,328	\$6,936,729	\$6,936,729
Shareholder Incentive	\$4,082,197	\$4,082,197	\$818,777	\$818,777
Cost of EE	\$114,802,051	\$114,802,051	\$41,810,496	\$41,810,496
Difference	\$48,686,592	\$21,370,677	\$10,001,070	\$9,708,717

Based on this analysis, the 2024 Plan is compliant with the Standard of Lower Than the Cost of supply.

Section Seven: Savings Goals

In 2024, the Company will primarily measure performance through lifetime energy savings. The Company recognizes the long-term value of developing and achieving lifetime energy savings goals because of the focus on longer term customer savings and benefits. The Electric Portfolio will measure energy savings in units of lifetime MWh and the Gas Portfolio will measure energy savings in units of lifetime MMBtu. For comparability with past plans, the Company will

continue to track and report on annual energy savings. Electric demand savings, from passive energy efficiency savings, will continue to be measured and reported in annual units of kW.

The Company will also track net annual and lifetime all-fuel MMBtu (electric, gas, oil, and propane) savings for both the electric and gas portfolios.³⁷ Tracking net annual and lifetime all-fuel savings (MMBtu) more fully captures the net effect of all-fuel savings efforts (electric, gas, oil, and propane). The tracking effort will provide useful information and benchmarking for state efforts to support decarbonization of the thermal energy sector and better support state and Company greenhouse gas reduction goals now and in the future. Carbon reductions will be calculated and reported as a secondary goal in 2024 consistent with the Standards and the Act on Climate.³⁸ Savings goals for the Electric Portfolio are presented in Attachment 5 and for the Natural Gas Portfolio in Attachment 6.

7.1 Annual Plan Compared to the Three-Year Plan

The energy and cost savings for the 2024 program year are consistent with the objectives and requirements of Least Cost Procurement. For 2024, the values in the 2024-2026 Plan are identical to the values in the Annual Plan. In future annual plans during the 2024-2026 term, the Company will examine key drivers contributing to differences with the 2024-2026 Plan. Based on prior years' experience, the Company expects the drivers to be budgets, cost to acquire energy efficiency, measure mix, evaluation results, changes to avoided costs, and addition or elimination of categories of benefits.

Commented [AC176]: What values? There were changes between the First Draft 2024 Annual Plan and 3YP - is this meant to reference the combined filing which will make this statement true? Ignore this comment if so

Commented [RIE176R2]: To be addressed

7.2 Comparison of 2024 Goals with Proposed EERMC Targets

This section compares the Company's proposed goals for 2024 with the targets proposed by the EERMC in Docket 23-21-EE.³⁹ These targets, which were informed by the EERMC-commissioned Market Potential Study Refresh, are still under PUC review. Table 11 shows a summary comparison by sector of lifetime savings.

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³⁷ See Tables E6-A and G6-A for calculation of annual and lifetime MMBtu of all fuels.

³⁸ See Tables E6-A and G6-A for calculation of annual short tons of carbon dioxide.

³⁹ PUC Docket No. [23-21-22](#): RI Energy Efficiency & Resource Management Council's Recommended Targets for Energy Efficiency and Active Peak Demand Reduction Savings for 2024-2026 (filed 4/28/23).

Table 11. Comparison of Goals with EERMC Proposed Targets

	Planned Values		EERMC Proposed Targets	
	Lifetime MMBtu (Gas Programs)	Lifetime MWh (Electric Programs)	Lifetime MMBtu (Gas Programs)	Lifetime MWh (Electric Programs)
Residential				
2024	1,084,565	188,880	3,225,203	524,767
Income Eligible Residential				
2024	287,482	56,013	291,786	60,900
C&I				
2024	1,916,991	488,939	3,541,850	811,977
Total Savings				
2024	3,289,038	733,832	7,058,839	1,397,644

To perform the comparison, because measure names in the two sources do not match, assumptions were made to match MPS measures with BCR measures. This matching process could have potentially created some disparities in the comparison. With this caveat in mind, the primary differences between the MPS Refresh and BCR include:

- **Planned quantities.** The difference in quantities between the MPS Refresh and the Company’s goals is largely driven by unconstrained budget increases allowed in the MPS Refresh. The significantly higher quantities in the MPS Refresh caused savings to be significantly higher for many measures.
- **Sourcing and values of impact factors.** The BCR sources were mostly Rhode Island specific studies, recent Massachusetts studies, or sourced from recent technical reference manuals (TRMs). These updated sources in several cases reflected decreased savings compared to the sources used in the MPS Refresh which included IL 2019 TRM, Iowa 2018 TRM, MA 2019 TRM, Dunskey Professional Judgement, and ENERGY STAR sources.
- **Lifetime savings.** Differences in lifetime savings were driven by differences in impact factors and planned quantities, as well as some measure life differences.
- **Measure included in the MPS Refresh.** There were a handful of measures providing savings in the MPS Refresh that the Company does not currently plan for in its energy efficiency programs. Some of these measures failed the RI Test when the Company had previously screened them and some of them are new.

This comparison provides valuable insight into the differences between the EERMC’s filed targets and the goals proposed by the Company over the coming three years and this analysis was shared with the EERMC. Further understanding of these differences could reduce the gap between the savings estimates. It could also provide insight into potential recommendations for updates in subsequent Plans. These updates may include updating impact factors by using assumption references from the MPS Refresh, updating planned quantities through considering different marketing approaches or adjusting incentive levels, adding in new measures called out within the MPS Refresh, or using the analysis to support net savings goals.

Section Eight: Budget and Funding Plan

8.1 Budgets

The Company is proposing Energy Efficiency Portfolio budgets for 2024 that are 0.1 percent higher than the final approved budgets for 2023.⁴⁰ In developing the Annual Plan, the RI Energy team has focused on striking the best balance between delivering the necessary benefits of energy efficiency and maintaining a budget that reduces bill pressure on our customers given present economic realities affecting Rhode Island. The Company submits that its approach in developing the budget for 2024 is consistent with the prudence requirements of the Standards.

The Energy Efficiency Portfolio for 2024 will have an overall budget of approximately \$96.96 million for electric programs and \$34.95.0 million for natural gas programs. The budget is segmented into three sectors: residential income eligible, residential non-income eligible, and C&I. Proposed sector and program budgets are provided in Attachment 5: Electric EE Program Tables, Table E-2 and Attachment 6: Gas EE Program Tables, Table G-2. A comparison of these proposed budgets to the 2023 budget is provided in Attachment 5, Table E-4 and Attachment 6, Table G-4.

The Company will continue the practice of funding commitments established in the 2014 Plan, Docket 4451. Specifically, the Company will continue to make funding commitments for projects with a projected one-time incentive

⁴⁰ Costs approved for ConnectedSolutions programs in 2023 are excluded from this comparison, as those programs are no longer part of the Energy Efficiency Program Portfolio.

in excess of \$3.0 million. For all other projects, except those with incentives greater than \$3.0 million, there would be no commitment budget.

8.2 Funding Plan

The 2024 budgets for cost-effective electric and natural gas efficiency investments are dependent on a number of projections that inform the amount of funding, including projections of electricity and natural gas sales, year-end 2023 large C&I program commitments, capacity payments received from ISO-NE (electric only), and forecast year-end 2023 spending. The sources of funding and the amounts of the funding proposed for the 2024 Energy Efficiency Portfolio are shown in Table E-1 for Electric Programs and Table G-1 for Natural Gas Programs. Annual Plan funding sources are described in the sections that follow.

8.2.1 Energy Efficiency Charges

The sources of funding for the 2024 electric programs are shown in Attachment 5: Electric EE Program Tables, Table E-1. To collect these funding sources for the 2024 cost-effective programs, the Company proposes: (1) one line on the customers' bill labeled "Energy Efficiency Charge" at \$0.01054~~1~~ per kWh, as calculated in Attachment 5, Table E-1 (composed of the existing energy efficiency program charge of \$0.0096 per kWh plus a fully reconciling funding mechanism charge of \$0.00094~~1~~ per kWh in accordance with the requirements of R.I. Gen. Laws § 39-1-27.7); (2) projected Large C&I commitments from 2023, if any; (3) projected carryover of the year-end 2023 fund balance, as applicable, including interest at the rate in effect for customer deposits; (4) forecast revenue generated by ISO-NE's Forward Capacity Market (FCM); and (5) other potential outside revenue sources, including but not limited to those generated through RGGI permit auctions. Funding sources do not include revolving loan funds.

The sources of funding for the 2024 natural gas programs are shown in Attachment 6 Gas EE Program Tables, Table G-1. The Company proposes that the 2024 budget should be funded from the following sources: (1) one line on the customers' bill labeled "Energy Efficiency Charge" at \$1.09520~~1~~ per dekatherm for residential customers and \$0.915~~821~~ per dekatherm for non-residential customers as calculated in Attachment 6, Table G-1 (composed of the existing energy efficiency program charge of \$1.136 per dekatherm plus a fully reconciling funding mechanism of [~~\$0.041~~65 per dekatherm for residential customers and the existing energy efficiency program charge of \$0.620 per dekatherm plus a fully reconciling funding mechanism of \$0.2950~~1~~ per dekatherm for non-residential customers in accordance with the requirements of R.I. Gen. Laws § 39-1-27.7); (2) projected carryovers or under-recoveries of the year-end 2023

fund balance, including interest at the rate in effect for customer deposits. Funding sources do not include revolving loan funds.

The increase in the proposed EE Program Charge per kWh is driven by a smaller positive projected 2023-year end electric fund balance forecast relative to the 2022 year-end electric fund balance. The increase in the C&I and Residential Program Charge per Dth is driven by the decrease in the 2023 year-end gas fund balance forecast compared to the 2022 year-end gas fund balance.

Commented [SR177]: Is this and the reference below intended to be 2023?

Commented [RIE177R2]: edited

The Company forecasts electric energy deliveries and gas loads for a variety of filings. In the context of the Annual Plan, the forecasts primarily factor into the calculation of the per-unit energy charges that fund the Natural Gas and Electric Energy Efficiency Portfolios. At the time of the preparation of this Annual Plan, the Company used a gas forecast based on the June 2023 release and an electric forecast based on the September 2022 release. The sections below provide an overview of the forecasting processes for the electric energy delivery and gas load forecasts.

Electric Forecast Summary

The electric energy deliveries forecast is developed in several steps. The first step was to “reconstitute,” that is add-back or subtract, as applicable, the impacts of energy efficiency (EE), solar-photovoltaics (PV), electric vehicles (EV), and electric heat pumps (EH) to the historical monthly energy dataset. This set of programs and technologies is termed Distributed Energy Resources (DERs), and the reconstituted data is termed “gross” to reflect the fact that it represents data prior to the impacts of DERs.

The second step is to develop an econometric forecast of gross energy deliveries based on Rhode Island economic conditions, normal weather, and days billed, as appropriate, using this reconstituted dataset. The economic conditions are from Moody’s economy outlook. The weather variables considered are cooling degree days (CDDs) and heating degree days (HDDs). Normal weather is defined by the average CDDs and HDDs of the most recent ten years. Due to the unavailability and / or great uncertainties of long-term weather forecasts, it is a common practice to use normal weather for long-term load forecasting.

The third step is to create the “net” forecast by adjusting the gross forecast by the projections for future DERs. Impacts for EE and PV (reflecting decreased electric load on the system) are subtracted from the gross forecast, impacts of EV (reflecting increased electric load on the system) are added to the gross forecast, and impacts of EH are added to or subtracted from the gross forecast depending on the season to create the net forecasts. These forecasts were first

developed in terms of revenue classes – residential, commercial, and industrial. They were then allocated to the various rate classes using the current revenue to rate class percentages from the Company’s billing system.

Natural Gas Forecast Summary

The Company’s gas load forecast is based on a comprehensive methodology for forecasting retail customer load requirements using a series of econometric models to determine the changes expected for Residential Heating, Residential Non-Heating, Commercial, and Industrial classes. To determine total gas demand and projected growth over the forecast period, the econometric models use historical economic, demographic, and energy price data, and weather data.

The product of the Company’s retail demand forecast is a forecast of meter counts, use-per-customer, and volume by month by internal rate code under normal weather conditions. The Company’s retail demand forecast is then converted to wholesale supply requirements at the Company’s city gates based on the daily relationship between city gate volumes (including supplementals) and weather. The product of the Company’s wholesale customer requirements forecast is a forecast of daily volumes under normal and design weather conditions.”

8.2.2 Fund Balances

The Company estimates that the electric projected fund balance at year-end 2023 will be \$9.0 million, as shown in Line 3, Attachment 5, Table E-1; the gas fund balance at year-end 2023 is estimated to be (\$1.5 million), as shown in Line 2 Attachment 6, Table G-1. The Company has included 2023 year-end fund balance forecasts (electric and gas) on line 3 of the E-1 and on line 2 of the G-1 tables in Attachment 5 and Attachment 6, respectively. The fund balance forecasts include estimated implementation expenses and estimated earned-performance incentives.

Adjustments for 2023 Year-End Fund Balance

The 2023 year-end fund balance will be a function of actual implementation expenses and Company earned performance incentive through year-end 2023. Consistent with recent practice, on November 17, 2023, the Company will provide updated year-end fund balance forecasts, reflecting updated sales, collection, and program expenditure forecasts through year-end and revised Tables E-1 and G-1 to provide the PUC with time to review the Company’s proposed charges in advance of the Annual Plan hearing. This would allow the charges, if approved, to have an effective date of January 1, 2024. This will allow the Company to begin collecting the most accurate charge possible at the start of the program year and avoid any market confusion surrounding the status and implementation of the 2024 energy

efficiency programs. If the actual year-end 2023 fund balance as filed in the Year-End Report is higher or lower than that amount projected in the November 17, 2023 revised Tables E-1 and G-1, any deviation will be fully reconciled in the next program year in accordance with the requirements of R.I. Gen. Laws § 39-1-27.7.

The fund balance does not currently include credits from shareholder funds, with interest, to the fund balance based on the Company's involvement in Docket 22-05-EE. All credits identified thus far in that process were accounted for in the 2023 Annual Plan.

8.2.3 ISO-NE Capacity Market Revenue

Consistent with the LCP Standards, Annual Plan, and PUC decisions regarding annual plans since 2008, the kW-demand savings achieved via the electric energy efficiency and Combined Heat and Power programs continue to participate in the FCM as Passive On-Peak Demand Resources. The Company will manage and direct the revenues by bidding the demand savings attributed to energy efficiency measures and Combined Heat and Power facilities in the FCM and managing the associated capacity resources to maximize the resulting FCM revenue. The revenues from measures installed through this Annual Plan, as well as all previous plans, will continue to be reinvested in energy savings for the life of the measure.

The Company is to recover all prudently incurred FCM expenses from ISO-NE capacity-payment revenue generated by the demand savings from efficiency programs represented by the Company. The Company expects that capacity payments received from the ISO-NE will exceed its administrative and EM&V compliance costs of participation in the FCM and will result in additional funds being made available to fund efficiency programs for customers. If these participation costs exceed the capacity payments, the Company may recover its prudently incurred costs from the energy efficiency program fund. Only prudently incurred expenses are deducted from ISO-NE capacity payments or the energy efficiency program fund.

In addition, as part of the FCM, all qualified auction participants are required to post Financial Assurance to provide security that the promised resource will deliver the promised MW at the promised time. If, as a result of circumstances

beyond the Company's control⁴¹, the Company is unable to provide all or a portion of the MW of capacity proposed in its qualification packages and capacity auction bids, some or all the financial assurance monies would be forfeited.

8.2.4 RGGI Funding

RGGI funding is allocated to the State of Rhode Island based on quarterly auctions for emissions allowances. The OER develops a plan for the allocation of auction proceeds. No RGGI proceeds have been allocated to the Company for 2024 energy efficiency programs.

8.2.5 Exceptions to the Natural Gas Energy Efficiency Program Charge

All gas used for distributed generation projects approved since 2014 will be subject to the natural gas energy efficiency surcharge.⁴²

The 2006 Act allows the PUC to exempt natural gas used for manufacturing processes from the energy efficiency surcharge where the customer has established a self-directed program to invest in and achieve best effective energy efficiency in accordance with a PUC-approved plan and subject to periodic review and approval by the PUC. Consistent with prior PUC decisions, the Company has developed recommendations for a process under which a manufacturer may submit its self-directed program and the required annual reports for approval. The Company recognizes that this process may need to be reviewed and modified after the PUC has accumulated sufficient experience with these programs. Any customer that receives this exemption from the natural gas energy efficiency program charge will not be eligible to receive natural gas energy efficiency program services.

⁴¹ Such circumstances may include legislative action to alter the EE Program Charge or discontinue the Company's authority to implement the energy efficiency programs underlying the Qualifications Package or a PUC decision limiting the Company's role in bidding the demand savings acquired through program efforts into the FCM.

⁴² Natural gas used for distributed generation (excluding natural gas used by emergency generators) for distributed generation projects approved under the energy efficiency programs in 2013 and prior years - independent of the date those facilities become commercially operable - are not subject to the energy efficiency surcharge when natural gas used for that purpose can be clearly identified through uniquely metered use and when so requested in writing by the customer.

8.2.6 Budget Management

Deviations from the planned budget for 2024 are possible during the program year. The Company contemplates three potential overspending scenarios, and will address them as follows:

- **Anticipated overspending up to 10 percent.** The Company's expenditures for 2024 may exceed the total portfolio budget by up to 10 percent as long as written notification is provided to the EERMC, OER, PUC, and DPUC for any deviation. The Company will track expected expenditures relative to planned budgets and will report to stakeholders through inclusion in the quarterly reports, or earlier, if the Company believes such overage is likely to occur. Any such notification will occur as soon as possible, and no later than the distribution of the Company's Third Quarter Report in mid-November 2024 and must explain the need for a higher budget and must justify how the expenditures are reasonably consistent with the original Annual Plan and in accordance with Least Cost Procurement.
- **Anticipated overspending in excess of 10 percent.** During 2024, if the Company anticipates that continued operation of its programs is likely to result in actual expenditures exceeding the total portfolio budget by more than 10 percent, the Company will seek a vote of approval from the EERMC. OER commits to making all reasonable efforts to schedule such vote as soon as feasible following notification, but no later than thirty days from receipt of notification. The PUC will not provide advance approval of expenditures exceeding the total budget by more than 10 percent. The Company will be required to demonstrate to the PUC that the overspend was prudent. Support from the Division, OER, and EERMC will be considered in the PUC's review of prudence.
- **Unanticipated overspending in excess of 10 percent.** If the Company did not anticipate and notify stakeholders identified above that its actual expenditures would exceed the total portfolio budget by more than 10 percent, but actual expenditures do exceed such threshold, such expenditures above 110 percent of approved budget will be at the Company's risk. In order to secure cost recovery, the Company will bear the burden of demonstrating the reasonableness of its actions to the PUC, including an explanation of why the overspending occurred and how the expenditures are reasonably consistent with the original Annual Plan and in accordance with Least Cost Procurement. Such a demonstration would be required to be part of the 2024 Year-End Report.

In all instances, the PUC retains its traditional ratemaking authority to review the prudence and reasonableness of the Company's actions.

8.2.7 Notification of Large Customer Incentives

The Company shall inform the PUC, DPUC, OER, and EERMC in writing of any energy efficiency incentive annual offer in excess of \$3 million per measure. The Company shall inform the DPUC, OER, and EERMC in writing of any Combined Heat and Power project with a net output of 1 MW or greater (where net is the nameplate MW output minus Combined Heat and Power auxiliary kW). The process for notification of Combined Heat and Power projects is described in Attachment 2: C&I Programs.

To prevent customer delays and to facilitate the Company's ability to meet customer expectation and annual energy savings goals, the OER, EERMC and Division agree to ask questions and provide comments on any non-Combined Heat and Power energy efficiency incentive annual offer in excess of \$3 million within 30 days. The Company, through its own discretion, may proceed with an incentive offer. The incentive, and any other related proposals will be authorized to proceed after 30 days from the date on which the Company notified the PUC, OER, Division, and EERMC of the incentive unless the PUC suspends the filing and/or issues an order within such 30-day period to extend the time for purposes of further review.

Section Nine: Performance Incentive Plan Structure

The Performance Incentive Mechanism (PIM), as approved in Docket 5076, established the measurement of performance as a net benefits framework based on a set of prioritized benefit categories. This prioritizes utility system impacts over resource benefits generated by the programs and omits the societal benefits. The "netting" calculation incents budget controls so that the benefits are achieved in line with the portfolio budgets as proposed in the Annual Plan.

Equation 1. Illustrative Calculation of Net Benefits for Performance Incentive Mechanism

$$\text{Total Benefits} = (100\% \text{ of Utility System Benefits} + 50\% \text{ of Resource Benefits})$$

$$\text{Net Benefits} = (100\% \text{ of Utility System Benefits} + 50\% \text{ of Resource Benefits}) - (\text{Programmatic Costs} + \text{Regulatory Costs})$$

The PIM measures performance at the sector and fuel level:

- Non-Income Eligible Residential Electric

Commented [RF178]: Is it time to adjust the PIMs to include some secondary metrics like achievement of goals for MF, equity, EnergyWise conversion rate, IE and non-participant services delivery increases, etc.? It would take away from the overall benefits goals but would focus RIE on some of the areas we need to improve.

Commented [RIE178R2]: That is a question for the PUC, but we are happy to discuss.

- Income Eligible Residential Electric
- Commercial and Industrial Electric
- Non-Income Eligible Residential Gas
- Income Eligible Residential Gas
- Commercial and Industrial Gas

The PIM calculations include a set of potential adjustments that are intended to further incent the company to maintain budget controls in the delivery of savings, and therefore prioritized benefits, by adjusting earnings under this mechanism based on cost relative to budget. The Company is not proposing structural changes to the PIM for 2024.

Attachment 5, Table E-8A and Attachment 6, G-8A show the categories of benefits that are included in the PIM calculations, categories omitted from the PIM, and the weighting assigned to those benefits in the calculation. The categories of benefits are also summarized in [Table 12](#) for electric and [Table 13](#) for gas [Table 13](#) below.

The monetized benefits included in the PIM are calculated from a subset of benefit categories included in the RI Test, calculated using the same methods and inputs as the RI Test.

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Table 12. Electric Energy Efficiency Portfolio Benefits Alignment for PIM Calculations

Benefit	PIM Categorization	Percent Allocation in PIM Calculation
Summer Generation	Electric Utility System Benefits	100%
Capacity DRIPE		
Transmission		
Distribution		
Reliability		
Winter Peak Electric Energy		
Winter Off Peak Electric Energy		
Summer Peak Electric Energy		
Summer Off Peak Electric Energy		
Electric Energy DRIPE		

Benefit	PIM Categorization	Percent Allocation in PIM Calculation
Utility Non-Energy Impacts (NEIs)		
Non-Embedded Carbon		
Natural Gas and Natural Gas DRIPE		
Oil and Oil DRIPE	Resource Benefits	50%
Propane		
Water		
Non-Resource (NEIs)	Other Not Included Benefits	0%
Non-Embedded NOx		
Economic		

Table 13.13. Gas Energy Efficiency Portfolio Benefits Alignment for PIM Calculations

Benefit	PIM Categorization	Percent Allocation in PIM Calculation
Natural Gas	Gas Utility System Benefits	100%
Natural Gas DRIPE		
Utility Non-Energy Impacts (NEIs)		
Summer Generation	Resource Benefits	50%
Capacity DRIPE		
Transmission		
Distribution		
Reliability		
Winter Peak Electric Energy		
Winter Off Peak Electric Energy		
Summer Peak Electric Energy		
Summer Off Peak Electric Energy		
Electric Energy DRIPE		
Oil and Oil DRIPE		

Benefit	PIM Categorization	Percent Allocation in PIM Calculation
Propane	Other Not Included Benefits	0%
Water		
Non-Resource (NEIs)		
Non-Embedded Carbon		
Non-Embedded NOx		
Economic		

Tables E-8B and G-8B show the costs that are used in the “netting” calculations in the PIM, and that are incorporated in the SQAs in the sectors to which they apply. The core of the costs included in the PIM is the “Eligible PIM Budget” derived from Attachment 5, Table E-3 and Attachment 6, Table G-3. The Eligible PIM budget is calculated based on the total budget from Tables E-2 and G-2 with regulatory costs equally distributed and commitments, EERMC costs, pilot costs, assessment costs, and performance incentive value removed.

Electric

In 2024, two electric sectors (non-income eligible Residential and C&I) are eligible to receive performance incentives. The combined eligible net benefits of these sectors have increased from 2023 to 2024. In 2024, the Company proposes a payout rate of 10.1% of 2024 planned PIM-eligible net benefits, which the same rate used to calculate the 2023 payout pool. Because of the greater amount of PIM-eligible benefits, this payout rate yields a target incentive pool of \$4,082,197, which is \$723,036 more in electric performance incentives than in 2023.

Commented [RIE179]: Numbers were updated

For 2024, the Company has proposed raising the maximum income eligible electric SQA from \$313,802 to \$369,561. This adjustment is directly scaled to the increase in total income eligible benefits between 2023 and 2024. The non-income eligible and C&I sectors are not eligible for SQAs in 2023.

Natural Gas

As in 2023, in 2024, the gas performance incentive is entirely allocated to the C&I sector (the only sector with positive eligible net benefits). Therefore (consistent with the calculation of the electric performance incentive), the specific

decrease in the Company’s proposed 2024 gas incentive was calculated by keeping the 2023 gas C&I payout rate of 11.7% constant for 2024. In 2024, the Company is seeking a payout pool of \$818,777 which is \$26,775 more in gas performance incentives than in 2023. This increase aligns with the increase in natural gas eligible net benefits.

Commented [RIE180]: Numbers were updated

In 2024, the Company has proposed lowering the maximum non-income eligible gas SQA from \$333,102 to \$302,323 and lowering the maximum income eligible gas SQA from \$123,176 to \$109,637. The adjustments are directly scaled to the changes in total sector-specific eligible benefits between 2023 and 2024. The C&I sector is not eligible for an SQA in 2024. Tables E-8C and G-8C show the final summarizations of the calculations for the PIM and SQAs, including target earning opportunities and maximum earning opportunities.

9.1 Future Performance Metrics

The Company does not propose any additional performance metrics for the 2024 Program Year.

Commented [SR181]: We recommend including a future performance metric related to equity in the 2024 plan, wherein the 2024 program year will be used to gather data on agreed-upon equity metrics which can then be used to assess an appropriate equity-based metric and associated numerical goal for inclusion in the 2025 PIM as an SQA.

Section Ten: Advancing Docket 4600 Goals and Principles

Along with the quantitative benefits detailed in this Annual Plan, as measured by the RI Test, the energy efficiency investments and innovation planned for 2024 also advance the Docket 4600 principles and goals.⁴³ The Docket 4600-A Guidance Document directed that “the proposing party must provide accompanying evidence that addresses how the proposal advances, detracts from, or is neutral to each of the stated goals of the electric system.”⁴⁴ To meet this directive, the Company describes how the Annual Plan either advances, detracts, or remains neutral on achieving the Docket 4600 goals for the electric system in [Table 14](#)~~Table 14~~.

To begin the discussion about what metric may be appropriate, some options could include:
1) achieving a particular share of spend in designated EJ communities; 2) achieving a particular share of program benefits (could be proxied with energy savings) in EJ communities; 3) an MF- and/or renter- specific spending and/or savings target, 4) a geographically weighted average attainment across EJ communities; 5) a participation, spending, or savings goal for microbusinesses, potentially within EJ communities; 6) a weighted average across several equity metrics wherein each one contributes to an overall equity SQA score that would then go in as a single value to the PIM, alongside other SQAs

Commented [RIE181R2]: This is a topic for future discussion and will not be included in the Plan

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⁴³ PUC Report and Order No. 22851 accepting the Stakeholder Report. Written Order issued Jul. 31, 2017.

⁴⁴ Approved final clean version of Guidance Document (Oct. 27, 2017).

Table 1414. Docket 4600 Goals for the Electric System

4600 Goals for Electric System	Advances/Detracts/Neutral
Provide reliable, safe, clean, and affordable energy to Rhode Island customers over the long term.	Advances: The Annual Plan gives customers tools to reduce their energy consumption. The safest, most reliable, most affordable energy is energy that is never used. Lowering energy consumption avoids investments in the installation, upgrade, or replacement of transmission and distribution infrastructure, and reduces strain on the system.
Strengthen the Rhode Island economy, support economic competitiveness, retain, and create jobs by optimizing the benefits of a modern grid and attaining appropriate rate design structures.	Advances: The Annual Plan will create significant economic benefits in Rhode Island. The Company expects that investments made in energy efficiency under this Annual Plan will add \$232.7 million to Rhode Island’s Gross State Product (GSP), equivalent to 2,361 job-years.
Address the challenge of climate change and other forms of pollution.	Advances: The Annual Plan will help reduce 72,976 short tons of carbon emissions in 2024 from the installed measures as well as reduce other pollutants associated with the generation and combustion of electricity, natural gas, and delivered fuels.
Prioritize and facilitate increasing customer investment in their facilities (efficiency, distributed generation, storage, responsive demand, and the electrification of vehicles and heating) where that investment provides recognizable net benefits.	Advances: The Annual Plan provides incentives for customers to invest in cost-effective energy efficiency measures in their facilities and participate in demand response programs and provides handoffs to other programs including EV charging programs.
Appropriately compensate distributed energy resources for the value they provide to the electricity system, customers, and society.	Neutral.

Commented [SR182]: Disagree with this characterization. RIE has chosen not to specify a view regarding what degree of emissions reductions from EE are considered on track for state-level climate goals, so it is inconsistent for the Company to put forward a clear finding here. While I think it is possible to argue that the choice to effectively defer consideration of Act on Climate for this entire three year cycle actively detracts from this goal, I would be willing to accept 'neutral' as a determination here, with an accompanying write-up indicating the Company expects to embrace its significant role in Act on Climate target attainment in the next three year planning cycle.

Commented [RIE182R2]: Not clear how we could characterize this as "neutral" when the amount of carbon reduction resulting from the Plan is positive. Act on Climate, and its implications, will be considered in subsequent years of this three-year cycle but for 2024 we do not yet have the information we need from EC4 to offer concrete steps beyond what has been outlined in this plan.

Commented [SR183]: Please explain these determinations. The description of this table indicates that it 'describes how the plan...' but that is not true of this and the next 'Neutral' determination.

Commented [RIE183R2]: The EE Plan does not compensate nor penalize distributed energy resources. Nor does it impose charges or rewards to customers for costs they impose on the grid.

4600 Goals for Electric System	Advances/Detracts/Neutral
Appropriately charge customers for the cost they impose on the grid.	Neutral.
Appropriately compensate the distribution utility for the services it provides.	Advances: The performance incentive contained in this Annual Plan compensates the Company for achieving the energy savings goals through delivering cost-effective energy efficiency programs to customers while aligning with the PUC's PIM principles.
Align distribution utility, customer, and policy objectives and interests through the regulatory framework, including rate design, cost recovery, and incentive.	Advances: The Annual Plan aligns Company, customer, and policy objectives and interests by incentivizing energy savings measures that enable customers to manage and reduce their energy consumption, which in turn contributes to the greenhouse gas reduction goals of the Act on Climate, Power Sector Transformation goals, Heating Sector Transformation goals, and the 100 percent Renewable Electricity goal while allowing the Company to earn a performance incentive.

Commented [SR184]: Disagree here again. See comment above on Act on Climate. There is no analysis I have seen showing that the level of EE activity in this plan is consistent with and on track for achieving an overarching strategy to meet these other objectives (e.g. 100% Renewable Electricity). Perhaps that is something the Company could speak to during an upcoming TWG to address how the plan fits into these overarching strategies.

Commented [RIE184R2]: The response reflects that the EE plan positively contributes to these areas. The comment suggests that the response should be a matter of **how much** the EE plan contributes not whether it does or not.

Section Eleven: Miscellaneous Provisions

- Other than as expressly stated herein, this Annual Plan establishes no principles and shall not be deemed to foreclose any party from making any contention in any future proceeding or investigation before the PUC.
- Other than as expressly stated herein, the approval of this Annual Plan by the PUC shall not in any way constitute a determination as to the merits of any issue in any other PUC proceeding.
- RI Energy will convene the EE TWG no less than six times in 2024 to review the status and performance of the Company's 2024 energy efficiency programs and advise the Company on potential programs for the 2025 program year.

Commented [SR185]: Please replace 'may' with 'will', I would also like to see a clearer overarching plan for what the TWG expects to cover next year, if possible. Perhaps the Jan meeting can set out plan for the year? It would also be good to meet every month from Jan - Sept (so nine meetings in total rather than 6), though I understand the desire to retain discretion regarding any TWG meetings while the annual plan docket is occurring.

Commented [BF185R2]: changed

Section Twelve: Reporting Requirements

In 2024, the Company will provide reports, including a report for the first three quarters of 2024 and an annual 2024 report. These reports will be sent to the EERMC, the Division, OER, the EE TWG, and the PUC and will include the most currently available program performance for both natural gas and electric efficiency programs. These reports will include a comparison of budgets and goals by program to actual expenses and savings on a year-to-date basis, and a status report on revolving loan funds. The Company reports will also include a summary of program and equity progress and will highlight issues by sector for EERMC, Division, OER, and EE TWG attention. Within the C&I sector, there will be separate highlighting of large and small customer program progress and issues. Beginning in the second quarter, the quarterly reports also include a forecast of expected results.

Commented [SR186]: Please include a commitment to report out on equity progress using agreed-upon quantifiable metrics in each quarterly report and the annual report.

Commented [BF186R2]: Added language

- Beginning with the 2019 Year End Report, the Company provided detailed costs schedules that were developed in collaboration with the PUC. The Company proposes to submit detailed cost schedules in the 2024 Year End Report. In addition, the Company also proposes to submit confidential vendor schedules to the PUC, with a motion for protective treatment. These confidential vendor schedules detail costs to individual vendors and other external entities.
- Per the Standards adopted in Docket 23-07-EE, the Company will provide to the EE TWG, and file with the PUC its 2024 Year-End Report no later than May 1, 2024. This report will include achieved natural gas and electric energy savings in 2024 and earned incentives for 2024. The report will also include a discussion of deviations from planned quantities as specified in the Standards.
- The Company will provide the EE TWG with a summary of evaluation results that have been incorporated into this 2024 Plan, including a description of the impact of those results in planning the Company's 2025 programs, in the 2025 Plan to be filed by October 1, 2024.

Section Thirteen: Requested Rulings

The Company respectfully requests that the PUC approve the 2024 Plan as presented in this document and the supporting attachments in its entirety. The Annual Plan has been developed with careful consideration of the linkages between all parts. The specific components of this 2024 Plan for which the Company requests approval include:

- The savings goals, programs, measures, budgets, and associated customer collections required to fund the 2024 energy efficiency programs.
- The demonstrations, pilots and assessments the Company proposes for the 2024 program year and the associated budgets and customer collections required to fund those efforts.
- The PIM and associated earning opportunity provided by the Company in this Annual Plan.

Attachments

Annual Plan Attachment 1: Residential and Income Eligible Energy Efficiency Solutions and Programs

Annual Plan Attachment 2: Commercial and Industrial Energy Efficiency Solutions and Programs

Annual Plan Attachment 3: Evaluation, Measurement & Verification Plan

Annual Plan Attachment 4: Rhode Island Benefit Cost Test Description

Annual Plan Attachment 5: Electric Energy Efficiency Program Tables

Annual Plan Attachment 6: Gas Energy Efficiency Program Tables

Annual Plan Attachment 7: Rate and Bill Impacts

Annual Plan Attachment 8: Demonstrations, Pilots and Assessments

Annual Plan Attachment 9: Cross-Program Summary

Annual Plan Attachment 10: Definitions

Annual Plan Attachment 11. Energy Efficiency Equity Working Group Final Report (To be provided with final plan filing)

Page 6: [1] Commented [MOC(E5R2)] Michael O'Brien Crayne (RI Energy)

9/7/2023 10:32:00 AM

I changed this value to exclude economic benefits and added a footnote noting as much. This number is now consistent with what is stated in Section 1.2.2 and results in a more modest BCR more in line with BCRs presented elsewhere,

Page 6: [2] Commented [SR6]

Samuel Ross

8/8/2023 8:50:00 PM

I would love to see a stronger commitment to capitalizing on, and sustaining, the surge in interest IRA has the potential to drive. Not just meeting the demand, but building on the momentum

Page 6: [3] Commented [ML7]

Margie Lynch

8/22/2023 1:37:00 PM

Please use an alternative term or terms, such as underserved. See this: <https://uprising.org.uk/news/i-am-not-hard-reach>

Page 6: [4] Commented [CJ8]

Craig Johnson

8/23/2023 10:15:00 AM

I noted this in the Resi attachment, but noting here as well for consistency. The use of "pilot" doesn't seem to be in alignment with how pilots are described in the DPA attachment.

For all references to Pilots, Demos, or Assessments in Main Text, Res, and C&I attachments, please ensure that terminology used is consistent with definitions in DPA attachment. Only flagging it here once in the Main Text, but please do a comprehensive review to ensure consistency and to avoid confusion.

Page 6: [5] Commented [RIE9]

Rhode Island Energy

8/28/2023 3:37:00 PM

Steven Chybowski: I understand that this may still be under development, but if it is possible to have a more firm commitment or pilot by the plan submission deadline, I would recommend updating this to be more than a "consideration"

▲

Page 6: [6] Commented [MH10]

Michael Honeychuck

8/23/2023 8:22:00 PM

Agree with other commenters that these type of statements about ideas or considerations in passive voice could be more explicit and described more as commitments

▲

Page 6: [7] Commented [SR12]

Samuel Ross

8/8/2023 8:52:00 PM

A qualitative increase in marketing effort and maybe a small pilot are not adequate equity commitments. I know that's obvious and assume there will be much more detail added in the final draft, including measureable equity performance metrics.

▲

Page 6: [8] Commented [RIE13R2]

Rhode Island Energy

8/28/2023 10:19:00 AM

Flexibility within program planning will allow the program to stay effective given changes within the market. This language is not requesting for additional flexibility, rather calling out that the programs need to be dynamic.

▲

Page 6: [9] Commented [SR13]

Samuel Ross

8/8/2023 8:58:00 PM

I don't understand the practical impact of this language. Are you requesting additional flexibility beyond what has been available in past?

▲

Page 7: [10] Commented [SR18R2]

Samuel Ross

8/8/2023 9:03:00 PM

This is not a principle that is present in LCP or has been supported in past program cycles. There is not a specific mandate to minimize on-bill costs, because that would obviously be in direct opposition to capturing all cost-effective savings. All cost-effective that is less than the cost of supply pretty directly supports expanding budgets up to the point where those criteria become binding. Strongly request removing any language implying there is a mandate to minimize on-bill collections, since there is not.

▲

Page 7: [11] Commented [TE19R2]

Toby Ast (RI Energy)

9/5/2023 2:45:00 PM

Can't offer a firm quantitative answer given the unknowns related to IRA timing and implementation details but do expect increase in program participation due to IRA funding availability. Working with OER to make sure we are ready for this.

Page 7: [12] Commented [SR19]

Samuel Ross

8/8/2023 9:04:00 PM

How many more customers are expected to be served? In what customer categories?

Page 7: [13] Commented [TE20R2]

Toby Ast (RI Energy)

9/5/2023 2:46:00 PM

In preliminary conversations with OER they have indicated the possibility that some IRA funding might be available to be used for Wx barrier mitigation.

Page 7: [14] Commented [SR20]

Samuel Ross

8/8/2023 9:04:00 PM

What is the funding level dedicated to these barrier mitigations?

Page 7: [15] Commented [SR22]

Samuel Ross

8/8/2023 9:06:00 PM

Will RIE directly incentivize these decarbonization efforts? Or act as a conduit for state funds that are incenting these activities? What specific decarbonization activities (i.e. distinct from historical EE activities that reduce carbon only due to energy savings) are planned in these end uses?

Page 7: [16] Commented [TE21R2]

Toby Ast (RI Energy)

9/5/2023 2:56:00 PM

Though not specifically mentioned here RI Energy and OER will coordinate efforts with regards to plans for equipment eligible for incentives via the IRA, including clothes dryers and other measures.

Page 7: [17] Commented [GR21]

Glenn Reed

8/14/2023 6:03:00 AM

Other end uses? Clothes dryers and cooktops?

Page 7: [18] Commented [TE22R2] Toby Ast (RI Energy) 9/5/2023 2:51:00 PM

RI Energy will coordinate with OER on these efforts. The specific pathways for funding are yet to be defined.

Page 7: [19] Commented [TE23R2] Toby Ast (RI Energy) 9/5/2023 3:00:00 PM

Decided against substantive changes to existing financing programs.

Page 7: [20] Commented [SR23] Samuel Ross 8/8/2023 9:07:00 PM

Does the plan describe this anywhere? This document would be the right place to publicize and seek feedback on any potential changes to the financing offerings, as well as feedback on what the expected impact of such changes might be.

Page 7: [21] Commented [SR24] Samuel Ross 8/8/2023 9:09:00 PM

This text is a bit confusing. Isn't 'this introductory section' the current section? Which is also section 1? I think this paragraph should be comprehensively updated and expanded to make clear what sections cover what, and use exact section numbering to reference each portion of the plan document (e.g. section 1.2, or even 1.4.3 if needed, to ensure readers know what part of the document is being referred to.

Page 7: [22] Commented [SR25] Samuel Ross 8/8/2023 9:11:00 PM

How do you know the exact values, and yet not have a shareable BC model for a full week? We would much rather have a draft BC model immediately even if your team is cleaning some things up in the meantime and plans to share an updated version later on.

Page 9: [23] Commented [RF32] Richard Faesy 8/18/2023 1:50:00 PM

No mention of additional federal funds, which shouldn't be counted on yet, but should they at least be mentioned as a potential increase in funding that could help leverage the existing budgets to go further and secure more savings?

Page 9: [24] Commented [SR33]

Samuel Ross

8/8/2023 9:25:00 PM

I would like to make sure I understand this language. Splitting the charge into two portions like this is somewhat confusing. Is this stating that there will be a total charge of 0.0096 + 0.00374 in 2024? Or is the fully reconciling mechanism an indication that some funds are planned for collection in 2025? Or something else? For the council's budgeting process it would be helpful to have a clear statement of exactly what the total ratepayer funds collected in 2024 will be to ensure that the budget proposal for the Council is within that value.

Page 17: [25] Commented [RE50R3]

Robin Donnelly (RI Energy)

9/6/2023 11:06:00 AM

To address eligibility increase. RIE will move all of these appliances mid-stream to most efficient path [ENERGY STAR Most Efficient 2023](#) | [ENERGY STAR](#)

Page 17: [26] Commented [CJ50R2]

Craig Johnson

8/23/2023 3:10:00 PM

2021 Energy Star Market Share Data from Glenn, note, we'll also provide similar comments in our BC Model Review:

+Dehumidifier - 94%

+Dryer - 40% electric, 50% gas

+Room AC - 55%

These measures should either be removed, the eligibility increased, and/or multiple incentive tiers established.

Page 17: [27] Commented [RE51R2]

Robin Donnelly (RI Energy)

9/6/2023 11:13:00 AM

Dryers are currently in both channels but ES Dryer will be removed starting in 2024 per the request from C-team

Page 17: [28] Commented [GR52]

Glenn Reed

8/16/2023 8:02:00 AM

Yes, but we've moved beyond basic ENERGY STAR - or should - for many/most appliances key appliances. This then complicates the marketing. It's more than just the label.

▲

Page 17: [29] Commented [AL(E53R2)] Angela Li (RI Energy) 9/5/2023 1:30:00 PM

The RI Home Energy Reports was still producing robust savings during the last evaluation. The MA, CT, NH evaluation focuses on an Eversource administered behavioral program which may not have the same emphasis on energy efficiency as the program offered in RI.

▲

Page 17: [30] Commented [GR53] Glenn Reed 8/22/2023 12:13:00 PM

Should this be continued given recent evaluations in MA, CT and NH. Do the RI efforts should sufficiently and consistently robust results?

▲

Page 17: [31] Commented [RF54] Richard Faesy 8/18/2023 2:08:00 PM

Are these still providing meaningful savings? Savings have been dropping in other states to the point where we are considering redirecting budgets to programs with longer-term savings.

▲

Page 17: [32] Commented [RF55] Richard Faesy 8/18/2023 2:10:00 PM

2024 should be the year we cease incentivizing CACs, as other states (CT) have done in 2023 and only incentivize central heat pumps instead.

▲

Page 17: [33] Commented [RIE57] Rhode Island Energy 8/28/2023 3:39:00 PM

Steven Chybowski: Curious about the role of central ACs as ASHPs become more prominent. Is this a product incentive that can be scaled back/phased out?

▲

Page 17: [34] Commented [CJ58R2] Craig Johnson 8/23/2023 3:13:00 PM

This has been a key recommendation from both the Council and other stakeholders for a couple of years now. It's particularly damning when well over 75% of the incentives associated with the gas HVAC program are tied to gas heating and hot water measures with a BCR <1.0.

▲

Page 20: [35] Commented [GR68]	Glenn Reed	8/16/2023 8:10:00 AM
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And the imposition of Federal lamp standards.

▲

Page 20: [36] Commented [SR70]	Samuel Ross	8/11/2023 6:36:00 AM
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I would support ADDING direct install LEDs for LI and MF segments back into the plan. Would not support shifting funds away from other program areas to do so.

▲

Page 20: [37] Commented [RIE70R2]	Rhode Island Energy	8/28/2023 11:10:00 AM
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Per Richard's comments we support including MF common area lighting, and we would also support including direct install LEDs. Will look to include some lighting in final plan.

▲

Page 20: [38] Commented [RIE69R2]	Rhode Island Energy	8/28/2023 11:10:00 AM
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Added a comment in Attachment 1 about support for including common area lighting for MF. RISE is reviewing savings data they have for this measure.

▲

Page 20: [39] Commented [RF69]	Richard Faesy	8/18/2023 2:28:00 PM
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Correct for screw-based LEDs. What about controlled fixtures in MF common areas?

▲

Page 20: [40] Commented [RIE72R2]	Rhode Island Energy	8/28/2023 11:10:00 AM
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Please refer to Equity Section 2.7 as well as attachment 1 for additional information on equity approach.

▲

Page 20: [41] Commented [RF72]

Richard Faesy

8/18/2023 2:29:00 PM

Good. What are the concrete steps and timeline to get there?

▲

Page 20: [42] Commented [CJ74R2]

Craig Johnson

8/23/2023 3:22:00 PM

I would add that any plan should be one that makes the EWG a continuous effort, rather than one that starts and stops.

▲

Page 20: [43] Commented [RIE73R2]

Rhode Island Energy

8/28/2023 11:10:00 AM

Please see Equity Section 2.7 as well as description of equity efforts in Attachment 1.

▲

Page 20: [44] Commented [ML73]

Margie Lynch

8/22/2023 1:46:00 PM

Please speak to how the EWG's recommendations have been addressed in this plan.

▲

Page 20: [45] Commented [SR74]

Samuel Ross

8/11/2023 6:38:00 AM

It would be great to have more specific details on what this plan is. The EWG in 2023 was started late, had few meetings, and consequently offered limited opportunity for substantive EWG member input. Please include a detailed schedule of planned EWG meetings for 2024.

▲

Page 20: [46] Commented [RIE77R2]

Rhode Island Energy

8/28/2023 11:10:00 AM

Please see Figures 1 and 2 in section 6.3.2 for breakdown of spending by sector.

▲

Page 20: [47] Commented [RF76]

Richard Faesy

8/18/2023 2:30:00 PM

What are the metrics we hope to meet in this effort?

▲

Page 20: [48] Commented [ML77]

Margie Lynch

8/22/2023 1:46:00 PM

How about measure incentives? What % of the Res and IES budgets are being dedicated to underserved populations?

▲

Page 20: [49] Commented [RIE78] Rhode Island Energy 8/28/2023 3:40:00 PM

Steven Chybowski: Again, this may be at an exploration stage today, but if something can be firmed up by Oct. 1, I would encourage stronger statements on this initiative.

▲

Page 20: [50] Commented [DB80R3] Dagher, Brendan 9/7/2023 3:03:00 PM

Please refer to attachment 8 for more details.

▲

Page 20: [51] Commented [DB80R2] Dagher, Brendan 9/7/2023 11:21:00 AM

This idea was presented to the EWG with more specifics on 8/30 and received feedback from stakeholders for further iteration. On the call we discussed getting this up and running in early 2024.

▲

Page 20: [52] Commented [SR80] Samuel Ross 8/11/2023 6:40:00 AM

This sounds interesting, but the description here seems to be that the company will consider this idea during EWG starting in 2024, which means in all likelihood it can't be implemented next year. Can the company add specificity regarding the idea, the desired impacts on program participation, and the timeline for conceiving, finalizing, and launching the pilot program?

▲

Page 20: [53] Commented [RF82] Richard Faesy 8/18/2023 2:32:00 PM

Can you commit to establishing a plan in 2024 to implement in 2025 to address this issue that was been discussed for years now? At least let's start with an IE program and then expend to market-rate.

▲

Page 20: [54] Commented [SR83] Samuel Ross 8/11/2023 6:43:00 AM

This does not read as a major change, despite being in this section. It reads as a continuation of current practice and perhaps some additional tracking of outcomes. I would love to see a major change in this section written in terms of a measurable goal for increased success supporting homes with pre-weatherization barriers in fully benefiting from the program (e.g. if historical rate is 25% barrier mitigation with 100 homes provided with subsequent EE upgrades, goal for 2024 could be to achieve 33% with 120 homes served, 2025 could be 40% with 150 homes served, etc.)

▲

Page 20: [55] Commented [TE84R2]

Toby Ast (RI Energy)

9/5/2023 3:43:00 PM

Will work with OER in 2024 to estimate these numbers.

▲

Page 20: [56] Commented [SR84]

Samuel Ross

8/11/2023 6:46:00 AM

Very important to understand what the mechanism and result of this type of leveraging is. Should be possible for RIE to estimate total ratepayer funds delivered through EE program channels, as well as expected \$ amount of federal program funds supporting same projects (wouldn't hold RIE accountable to this number, just helpful to understand the team's internal expectation about the total funding expected to be utilized by participating customers in 2024)

▲

Page 20: [57] Commented [RIE87R2]

Rhode Island Energy

9/8/2023 7:23:00 AM

Please refer to Attachment 8 for more details

▲

Page 20: [58] Commented [RIE86R2]

Rhode Island Energy

8/28/2023 11:13:00 AM

Information on tax credits has been added to the RIE website. As we continue to work with OER we will evaluate the best messaging with regards to tax credits and how they might motivate customer participation.

▲

Page 20: [59] Commented [RIE87]

Rhode Island Energy

8/28/2023 10:03:00 AM

Samuel Ross: Interesting idea - would love to better understand. Is this targeted at landlords?

▲

Page 20: [60] Commented [RIE86]

Rhode Island Energy

8/28/2023 10:03:00 AM

Margie Lynch: What about promotion of IRA tax credits and opportunity to co-deliver w/HOMES and HEEHRA incentives?

▲

Page 20: [61] Commented [SL88R2]

Lawrence, Spencer (RI Energy)

9/6/2023 10:51:00 AM

I added 'Please refer to Attachment 8 for more detail on this initiative.'

▲

Page 20: [62] Commented [RIE88]

Rhode Island Energy

8/28/2023 3:40:00 PM

Steven Chybowski: Same as above. Will or won't there be a multifamily financing pilot program in 2024?

▲

Page 26: [63] Commented [AC113]

Adrian Caesar

8/10/2023 5:00:00 PM

One good example of a program to get new entrants into the workforce is the Clean Energy Pathways internships sponsored by the MA PAs. It includes subsidies for wages paid to interns and new employees, and other resources for participating contractors that help them attract and retain talent

▲

Page 26: [64] Commented [SR114]

Samuel Ross

8/11/2023 7:53:00 AM

Again this sounds good, but is a generalized commitment to continue ongoing support efforts. The need is large enough here that more detailed efforts, and a significant YoY increase in resource allocation to workforce development, would be well justified.

▲

Page 26: [65] Commented [AC115]

Adrian Caesar

8/10/2023 5:14:00 PM

Again, need to consider expanded diversification here. The Plan should reference results from the WNA related to existing workforce demographics (race/ethnicity, language, sex, gender, etc.)

▲

Page 30: [66] Commented [RF124]

Richard Faesy

8/18/2023 2:42:00 PM

Where are we with exploring the Advanced Water Heating Standard to incorporate the quieter more efficient products?

▲

Page 30: [67] Commented [AC126]

Adrian Caesar

8/10/2023 5:17:00 PM

Understand that this plan is focused on IES customers, but think that small businesses should also be targeted if there is potential to replace electric resistance space and water heating, especially since microbusinesses are an underserved segment

▲

Page 30: [68] Commented [TE125R2]

Toby Ast (RI Energy)

9/5/2023 3:56:00 PM

It is a focus. We are already coordinating with OER on their Clean Heat RI program and have coordinated with them on a similar program using RGGI dollars allocated to the Company.

▲

Page 30: [69] Commented [RIE126R2]

Rhode Island Energy

9/8/2023 7:50:00 AM

Please see p.40 of Attachment 2 that addresses this and other electrification efforts for Small Biz customers.

▲

Page 34: [70] Commented [RIE142]

Rhode Island Energy

8/28/2023 3:55:00 PM

Acadia Center (summarized):

Geographic Categorization:

Acadia Recommends that the company present and categorize EE data by geographic areas which have more meaning than CDPs or zip code. By narrowing down and consolidating reporting metrics by more meaningful geographic areas, the company should also commit to reporting on these metrics on a consistent quarterly basis. Geographic categorization may also be informed by the ability of the company to establish informed annual targets for those areas.

Acadia center suggests the following geographic categorization on EE data:

- Municipality would allow for coordination with municipal level programs or outreach, and avoid any confusion around the accounting for villages within RI municipalities
- Divide the state by outreach service areas (CAPP agencies), which may inform targeted funding and outreach.
- Identify environmental justice areas in order to generate and compare rates of participation for EJ and non-EJ areas
 - o Once EJ areas have been isolated, a simple target could align with Justice40. For example. Aim to have at least 40% of assessments and 40% of weatherization performed in EJ communities.

The company should include specific, measurable metrics and targets in its 2024 annual plan. The # of home energy assessments/weatherization hold little meaning without referral to the size of the geographic area, number of eligible customers, and a target/goal for the year.

In the company's Q2 equity update, the separate tables for assessment and weatherization participation should be placed side by side in order to show the conversion rate from home energy assessment to weatherization. The universe of eligible customers for each geographic area should also be included, for an understanding of the percentage of customers reached in each market. By establishing an annual target for assessment and weatherization participation, quarterly reports would be able to include the percentage achievement towards the annual target. Acadia also encourages the company to consider not only the input of funding distribution but also the outcome of distribution of EE benefits.

Acadia proposes the following metrics for EW and IE customers across meaningful geographic areas:

- % of eligible customers participating in Home Energy Audits
- % resolution of pre-weatherization barriers

- % conversion from Home Energy Audit to Weatherization
- % Weatherization jobs by WMBEs
- % total energy savings benefiting residential customers in environmental justice communities
- Year-by-year increase in energy savings benefiting customers.

Acadia provides the following example of 2024 annual targets for further iteration with the company and stakeholders:

- 20% of eligible customers participating in Home Energy Audits
- 35% of pre-weatherization barriers resolved
- 50% conversion from Home Energy Audit to Weatherization
 - o Compare follow through rate by geo area, income, other factors
- 20% Weatherization jobs by WMBEs
- 40% total energy savings benefiting residential customers in environmental justice communities
- Total quantity (\$#) of energy savings to customers increase by 15% from previous year

Acadia proposes the following outreach engagement metrics:

- % of eligible customers reached at events
- % distribution of outreach events in environmental justice communities
- # of HEA customers that learned about or signed up at an outreach event
- % of marketing and education interactions with customers broken down by customer group
- # of individuals trained in each outreach service area
- Funding allocated to community based organizations for education and engagement

- Number of referrals from community orgs.

Acadia provides the following examples for outreach engagement targets;

- 5% of eligible customers reached at events
- 40% distribution of outreach events in environmental justice communities
- 5-25 of HEA customers that learned about or signed up at an outreach event
- % of marketing and education interactions with customers broken down by customer group
- 3-10 of individuals trained in each outreach service area
- Funding allocated to community based organizations for education and engagement
- 10-50 Number of referrals from community orgs.

Please tabulate the information below for inclusion in the Plan and ongoing data reporting (understand that some granular reporting may take time to develop as part of the Small Biz Participation Dashboard)

Recommended C&I Equity-focused metrics/data reporting:

- Total eligible SBDI customers by zip code
- Participation by zip code
- Unique customer accounts by consumption category (e.g. less than 250,000 annual kWh, 250,000-500,000 annual kWh... greater than 1.5 million annual kWh)
- Participation by consumption category

▲

Page 35: [72] Commented [FB(E150R2)] Feldman, Brett (RI Energy) 9/7/2023 12:42:00 PM

We have presented the concept at the EWG, will have ongoing discussions, and will proceed upon plan approval in Q1 2024

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Page 35: [73] Commented [RIE151] Rhode Island Energy 8/28/2023 4:14:00 PM

Acadia Center: Funding community partners to conduct EE education and outreach has been a consistent recommendation of the EWG. The company's 'demonstration' is non-specific and does not reflect the urgency and scale required to improve equity efforts. Acadia Center recommends that the company model a program after Mass Save's community first partnership by allocating annual funds to support community-based orgs and municipalities in implementing EE programs in their communities. These incentives to community-based organization and municipalities are in addition to EE incentives already available to residents. In MA, the utility program directly funds an organization to provide training for communities and that organization then hires members of the local communities to do on-the-ground education and outreach on the utility's EE programs.

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Page 35: [74] Commented [DB152R2] Dagher, Brendan 9/7/2023 11:21:00 AM

This idea was presented to the EWG with more specifics on 8/30 and received feedback from stakeholders for further iteration. On the call we discussed getting this up and running in early 2024.

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Page 35: [75] Commented [SR152] Samuel Ross 8/11/2023 6:40:00 AM

This sounds interesting, but the description here seems to be that the company will consider this idea during EWG starting in 2024, which means in all likelihood it can't be implemented next year. Can the company add specificity regarding the idea, the desired impacts on program participation, and the timeline for conceiving, finalizing, and launching the pilot program?

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