

2025 Residential and Income Eligible Energy Efficiency Solutions and Programs

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1. Overview

The goal of the 2025 Plan is to deliver optimized, tailored programs in an equitable manner to make Rhode Island homes energy efficient through weatherization, advanced building standards, efficient appliances, smart thermostats, and high-efficiency heating, cooling and hot water systems. To attain its energy efficiency savings goals will require the Company to make a concerted, sustained effort to ensure the workforce is well trained and that customers are aware of and participate in programs.

This attachment provides detailed descriptions of the Residential Portfolio, including information regarding the markets (customer/building types) targeted, eligibility requirements, offerings, implementation and delivery, as well as specific program-level changes and other notable items for 2025.

1.1 Residential and Income Eligible Programs

The Company offers the following programs listed in Table 1 below to provide comprehensive services to two regulatorily defined sectors: market rate and income eligible.

Table 1. Residential Market Rate and Income Eligible Programs

Market Rate Residential Sector ¹	Income Eligible Sector
EnergyWise Single Family	Income Eligible Single Family
Multifamily	Income Eligible Multifamily
Residential High Efficiency Heating and Hot Water	
Residential Consumer Products	
Residential New Construction	
Home Energy Reports	

There are several market rate Residential Portfolio programs where market rate and income eligible customers can participate, although the program is listed under market rate residential. These programs include Residential New Construction, Residential Consumer Products, Residential High Efficiency Heating and Hot Water, and Home Energy Reports.

¹ The ConnectedSolutions program is no longer being reported under the Energy Efficiency portfolio. It is anticipated that it will be part of the System Reliability Procurement filing.

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Commented [CJ1]: What happened to the “What to Look for” Section we had in previous iterations?

Similar line of comment - I think it would be good for the Res and C&I teams at RIE to coordinate on the “Overview” sections of their respective attachments. The overall plan would read a lot better if these sections were written in a consistent manner with consistent sub-sections.

Commented [RIE1R2]: Thanks for the feedback. We'll consider it for subsequent drafts.

Commented [CJ1R3]: Great. I'll leave this comment open for now then.

Commented [RIE1R4]: Had to prioritize other plan updates and comment responses over implementing this change.

Commented [RF2]: This makes it look like the bottom four Market Rate programs aren't available to IE customers, when they are available to everyone. Is there a way to convey this, like merging the cells under both columns for those bottom four programs?

Commented [RIE2R2]: Thanks for the comment. We recognize the potential for confusion, hence the explanation of eligibility immediately below the chart.

Commented [RF3]: Maybe merge the cells for these four programs to show this visually.

Commented [RIE3R2]: Please see response above.

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Program Description Structure

To streamline review of program information in the Annual Plan, the Company has adopted the following structure for each of the programs:

- a. Description of offering,
- b. Eligibility criteria,
- c. Implementation and delivery,
- d. Changes, enhancements, and other notable items -for 2025

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2. EnergyWise Single Family (Electric and Gas)

2.1 Offerings

The EnergyWise program offers comprehensive energy efficiency services for single family (1-4 unit) homes. The program uses a whole-house approach to identify energy saving opportunities in all major energy systems and end uses, including heating, cooling, and water heating systems, as well as water saving measures, plug loads, and building envelope leaks (air and thermal barriers). EnergyWise provides in-home services in two phases: home energy assessment and weatherization.

Home Energy Assessment

Customers will be able to choose whether to have an in-person assessment or a virtual home energy assessment². Only a small percentage of customers select a virtual assessment over the in-person assessment. However, the virtual home energy assessment is an excellent option for customers who are hesitant to commit to an in-person appointment. The virtual assessment was added due to COVID but at this point is less than 1% of initial audits. If the virtual audit indicates opportunity, an in-person audit is required to generate a scope of work.

During the in-home assessment, an energy specialist(s) (a Building Performance Institute certified building analyst) will look for immediate energy saving opportunities that can quickly be addressed during the visit including aerators, showerheads, pipe insulation for domestic hot water, refrigerator brushes (for cleaning refrigerator and freezer coils), smart strips, and programmable thermostats. In addition, the energy specialist will assess the home to as well as identify deeper energy saving opportunities. The energy specialist will also conduct combustion safety tests of all combustion appliances for both carbon monoxide and proper drafting. Applying a comprehensive, whole-house approach, the energy specialist will evaluate all major energy systems including the heating, cooling and water heating systems, appliances, water fixtures, plug loads, and critically the building envelope including both the thermal and air barriers, and the tightness of the building envelope.

An Energy Action Plan is presented to the customer at the end of the assessment and reviewed with the customer. The Energy Action Plan gives the customer a clear roadmap for upgrading their home,

² Virtual assessments were introduced in 2020 and provide multiple options to communicate energy savings information depending on customer familiarity with smart phone and video calling technologies. A video call can be used to guide the customer around their home so an energy specialist can assess the home's energy use. If the customer is not able to use video, the energy specialist will ask the customer send in pictures (before or after the virtual assessment) of important areas such as the attic, heating and water heating system, and basement crawl spaces while walking through the assessment by phone.

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Commented [ML4]: Please specific "single family" includes 1-4 units

Commented [RIE4R2]: Updated.

Commented [RF5]: Below it says "heating, cooling, and water heating systems". Is that what this should say too? Add an "and"?

Commented [RIE5R2]: Updated.

Commented [RF6]: One or the other? What if the home warrants an on-site visit based on what the technician sees in the video? Or, might it be useful to get a brief virtual home assessment before showing up on site?

Commented [RIE6R2]: Less than 1% opt for virtual at this point. It was a COVID option. Added text at end.

Commented [RF7]: Is this the BPI credential that all energy specialists carry, a BA-T or BA-P?

Commented [RIE7R2]: They are BPI BA T and BA P

Commented [G8]: "cleaning refrigerator and freezer coils"

Commented [RIE8R2]: Updated.

Commented [RF9]: They will install thermostats during the site visit? That's a great offering.

Commented [RIE9R2]: Yes, programmable thermostats.

Commented [G9R3]: Hmm...But not smart thermostats? Or maybe more importantly DR-enabled ones?

Commented [CJ9R4]: The BC Models clearly indicate that WiFi Thermostats are planned for the program, so maybe I'm not sure why the text would only talk about programmable.

Commented [RIE9R5]: Wifi tstats have compatibility issues and wiring complications that lead to call backs. Thus they are more expensive without significantly more savings. Customer can often get them cheaper due to frequent promos through RIE marketplace, and RISE lets them know about that.

... [1]

Commented [CJ10]: As reflected in Glenn and Rich ... [2]

Commented [RIE10R2]: Everything listed is "imme ... [3]

Commented [ML11]: Assess existing insulation leve ... [4]

Commented [RIE11R2]: Thanks. They do that, by n ... [5]

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including a recommended plan for weatherization (air sealing, insulation, ~~and duct sealing, and windows if appropriate~~) and associated costs, including available incentives, ~~and~~ customer costs, energy savings, and return on investment. The Energy Action Plan also provides the customer with a streamlined path to engage a qualified independent ~~weatherization insulation~~ contractor to perform the weatherization work. The Energy Action Plan details additional potential energy upgrades and incentives the customer may be eligible for, including high-efficiency heating, cooling, and hot water systems. Opportunities for financing the customer share of the weatherization (as well as other upgrades) are also provided. The work will then be assigned to a weatherization contractor who will contact the customer directly to schedule a date for weatherization work.

Weatherization

The energy specialist's primary focus during an in-home assessment is to examine the opportunity to improve the home's building envelope through air sealing (decreasing air leaks), duct sealing, and increasing insulation, collectively referred to as "weatherization." Weatherization is a cost-effective way to improve a building's performance. It also offers customers a healthier and more comfortable home that will passively remain cooler in the summer and warmer in the winter, helping reduce energy bills for customers. ~~Many health and safety considerations are addressed when weatherizing, such as adding attic ventilation or using mechanical fans to ensure a healthy air exchange rate.~~ The standard EnergyWise incentive currently offers 75% off (up to \$10,000) for insulation and 100% off air sealing.³

Many health and safety considerations are addressed when weatherizing, such as combustion testing (for carbon monoxide and proper drafting)) or installing mechanical fans to ensure a healthy air exchange rate.

One of the largest impediments to customers proceeding with weatherization are pre-existing health and safety issues or physical barriers, which prevent weatherization until remediated; collectively these issues are referred to as pre-weatherization barriers (PWBs). At this time, EnergyWise does not substantially pay for remediation of the pre-weatherization barriers, nor are they included in the weatherization scope of work to be implemented by program contractors. However, the customer is provided with more information such as types of contractors to call (with a list of contractors for some barriers) and information on available grants and loans. The information packet also emphasizes the importance of addressing pre-weatherization barriers for reasons other than continuing with the weatherization process (such as health and safety) to further ~~persuade~~encourage customers to move forward with the process.

The program also provides a \$250 incentive to customers who certify that pre-weatherization barriers have been remediated by appropriate licensed professionals, or it can also be used for lower cost

³ Duct sealing is offered if relevant. Average time is 2 hours. It is 100% if the ducts are in an unconditioned or semi-conditioned basement (sometimes it is the cause of draft issues for combustion appliances) or an attic.

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- Commented [RF12]: What about windows, even if t ... [9]
- Commented [RIE12R2]: Auditors do look at the wir ... [7]
- Commented [RF12R3]: If this is the case, then at le ... [8]
- Commented [RIE12R4]: Updated. ... [10]
- Commented [G13]: Maybe note that the Energy A ... [10]
- Commented [RIE13R2]: Updated language. It doe ... [11]
- Commented [RF14]: Including electrification/fuel ... [14]
- Commented [RIE14R2]: The energy specialist will ... [15]
- Commented [G14R3]: No proactive approach to ... [12]
- Commented [RIE14R4]: Information about CHRI is ... [13]
- Commented [G15]: Need to also include/integrate ... [19]
- Commented [RIE15R2]: As of now RISE provides t ... [18]
- Commented [G15R3]: Will this work for all custom ... [16]
- Commented [RIE15R4]: We provide the customer ... [17]
- Commented [RF16]: Is says "insulation contractor ... [20]
- Commented [RIE16R2]: Yes, made edit. ... [21]
- Commented [RF17]: What does this have to do wi ... [21]
- Commented [RIE17R2]: Updated. ... [23]
- Commented [RF18]: Is mechanical ventilation ... [23]
- Commented [RIE18R2]: It is recommended when ... [22]
- Commented [G19]: And duct sealing? ... [24]
- Commented [RIE19R2]: Duct sealing avg is 2 hour ... [24]
- Commented [G19R3]: Ok, but is there any mentio ... [27]
- Commented [RIE19R4]: Added footnote. ... [25]
- Commented [RF20]: Does this include attic ventila ... [25]
- Commented [RIE20R2]: Made edits for clarity. Pa ... [26]
- Commented [G21]: How prevalent are PWBs, or d ... [28]
- Commented [CJ21R2]: The Company does have s ... [32]
- Commented [RIE21R3]: We have some data that ... [29]
- Commented [RF21R4]: If this is the largest imped ... [30]
- Commented [RIE21R5]: We continue to grapple w ... [31]
- Commented [RF22]: We have been clarifying this ... [34]
- Commented [CJ22R2]: This obviously takes time, ... [33]
- Commented [RIE22R3]: In CT DEEP took ownersh ... [35]
- Commented [CJ23]: Do we have any data on how ... [37]
- Commented [RIE23R2]: We are working on it - e.g. ... [36]
- Commented [RF24]: This is not nearly sufficient to ... [40]
- Commented [CJ24R2]: Recognizing that this write ... [38]
- Commented [RIE24R3]: Again, this is the EW SF se ... [42]
- Commented [CJ24R4]: Can you provide any inform ... [39]
- Commented [RIE24R5]: Program data indicates th ... [41]
- Commented [RF25]: Customers won't remediate ... [44]
- Commented [RIE25R2]: IE SF provides money (bo ... [45]
- Commented [ML26]: I think the more likely outco ... [43]
- Commented [RIE26R2]: We are aware the PWB si ... [46]

barriers such as cleaning and tuning of the heating system. Pre-weatherization costs for knob-and-tube wiring, vermiculite, asbestos, mold abatement, structural concerns, and combustion safety can be included in the HEAT Loan. These are listed on the HEAT Loan application. The Company recognizes this remains is a major issue for the success of weatherization, and we have ideas in Section 2.4 below to discuss some possible changes.

As of now, the program provides a \$250 incentive to customers who certify that pre-weatherization barriers have been remediated by appropriate licensed professionals, or it can also be used for lower cost barriers such as cleaning and tuning of the heating system. Pre-weatherization costs for knob and tube wiring, vermiculite, and asbestos can be included in the HEAT Loan.

To further help customers address any PWBs identified, the Lead Vendor provides more information such as types of contractors to call (with a list of contractors for some barriers) and information on available grants and loans. The information packet also emphasizes the importance of addressing pre-weatherization barriers for reasons other than continuing with the weatherization process to further persuade customers to move forward with the process.

2.2 Eligibility Criteria

EnergyWise is the flagship in-home comprehensive energy efficiency offering for all Rhode Islanders in single family residences (defined as one to four units) who are not candidates for the Income Eligible Services Program. All market rate customers with either an electric or natural gas Rhode Island Energy account can participate. Homeowners, renters, and landlords are all encouraged to participate. Customers with any heating fuel type, including delivered fuels, are served (so long as they have a Rhode Island Energy account).

2.3 Implementation and Delivery

EnergyWise is delivered through a Lead Vendor model where the Lead Vendor provides assessments and schedules weatherization projects with the Independent Insulation Contractors who provide weatherization services. The Lead Vendor provides program oversight of all weatherization work. Before the Independent Insulation Contractor closes the job, the Lead Vendor verifies the completion of all contracted work. This process minimizes return visits and complaints from customers. Spanish and Portuguese speaking energy specialists are available by request and a translation service is available for other languages.

To manage program performance, key performance indicators are tracked to measure and improve consistency of program delivery and to help meet goals. Data tracked includes audits requested, audits scheduled, and audits completed, as well as general progress towards annual saving and spending goals.

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Commented [G27]: Is this a complete list or examples? What about mold and mildew remediation?

Commented [CJ27R2]: Please include all pre-wx costs that can be included in the HEAT Loan. If the list that is provided is the full list, please update the language so it is clear that it is the full list of eligible items.

Commented [RIE27R3]: We will check and update language in the next draft.

Commented [RIE27R4]: Updated.

Commented [RF28]: Mention mold and mildew?

Commented [RIE28R2]: See above.

Commented [RF29]: Customers won't remediate the barrier not participate in EnergyWise without someone to guide them through the remediation process, offering them funding (especially IE customers), and ensuring that the work is completed before re-enrolling them in the weatherization program.

Commented [RIE29R2]: IE SF provides money (both SBC and nonSBC) and manages the process to get remediation done. For EW SF, we are working to secure funding to have RISE get bids for remediation. As you know, we do not have a state agency like CT's REPS in RI.

Commented [ML30]: I think the more likely outcome is that they will not proceed with weatherization at all.

Commented [RIE30R2]: We are aware the PWB situation for EW SF is far from ideal. It is challenging given the cost of supply situation following last year's hearings, and the high amounts spent on delivered fuels customers. We are working to secure non SBC funding to enable RISE to ... [47]

Commented [RF31]: Mention mold and mildew?

Commented [RIE31R2]: See above.

Commented [CJ32]: Do we have any data on how successful (or not) this approach has been? I'd venture ... [49]

Commented [RIE32R2]: We are working on it - e.g., to enable RISE to PM remediation bids. ... [48]

Commented [ML33]: As noted above, this information should be provided at the beginning of the program ... [50]

Commented [RIE33R2]: Thanks Margie. Edited.

Commented [GR34]: No discussion of program marketing as there is below for IE-SF. Please add some text

Commented [RIE34R2]: Added text.

Commented [RF35]: Capitalize when mentioned above?

Commented [RIE35R2]: Edited.

The Lead Vendor model facilitates consistent assessments for customers and allows the program to incorporate testing of new concepts as well as generating leads for other programs. EnergyWise's program design has been consistently recognized as best-in-class by the ENERGY STAR® Partner of the Year awards for program implementation.

Customers can apply for low-cost financing through the HEAT Loan to finance the customer costs associated with the upgrade(s). Financing the energy upgrades requires selecting an approved lender and applying for the loan. For customers with lower credit scores, there is a lender that specializes in financial coaching and approves HEAT Loans for energy upgrades.

An independent third-party company provides quality control and quality assurance to at least 5 percent of all assessments and weatherization projects.

The program is marketed using a multi-channel approach featuring direct mail, target e-mails, bill inserts, radio, local newspaper and magazine print ads, online banner ads, native articles, Facebook/Instagram ads, Facebook/Instagram videos, and Google paid search discovery. The program also conducts outreach at a variety of community events, home shows, and employer sponsored informational sessions.

2.4 2025 Program Enhancements, ~~and~~ Changes, and Other Notable Items

For the Energy-Wise Single Family (EW SF) program in 2025, there are several key challenges, themes, and ideas that the Company is focused on.

Cost of Supply & Justification

The Company continues to deliberate on approaches to serve delivered fuels and other customers given PUC feedback. The framework outlined by the PUC is most pronounced for our "Direct Install" programs (the single and multifamily programs), and it is particularly relevant for the EW SF program given the amount of delivered fuels (oil, propane) audits and weatherization that occur. It is important to note that the framework also impacts electric and gas measures. For further discussion on this topic, please refer to the Main Text, Section 6.6 "Cost of Annual Plan Compared to the Cost of Energy Supply." ~~(Consistency with Standards)~~

Moderate Income

The Company will continue to work on the issue of pre-weatherization barriers through improved data collection and analysis, seeking additional funding, and exploring partnerships.

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Commented [RF36]: So, it looks like the QA has dropped from 100%, which is great.

Commented [CJ36R2]: When we say "at least" are we saying that it could be something larger than 5% just because you may not be able to get to a round number, or are we saying that this can balloon to something much larger than 5%? If the latter, what are the determining factors?

Commented [RIE36R3]: Official 3rd party QA/QC is 5%.

Commented [G36R4]: Ok, but is this sufficient. Maybe

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Commented [SC37]: OER believes it is still important to continue to provide EnergyWise programming to delivered fuels customers, the co-benefits of this programming for delivered fuels customers is significant and readies th... [53]

Commented [RIE37R2]: Noted

Commented [CJ38]: Strongly opposed to any approach that would exclude or limit services to DF customers. ... [51]

Commented [RIE38R2]: This is part of the Justification discussion in the Main Plan Text. Please provide ... [55]

Commented [CJ38R3]: The main thing I want to convey at this point is that the justification framework provi... [54]

Commented [RIE38R4]: We appreciate the sentiment, however we have not had any discussion with the PU... [52]

Commented [SC39]: The improved tracking will make it easier for us to identify funds to address these issues ... [57]

Commented [RIE39R2]: Thanks Steve, we agree. To your latter point, that is something we could theoretically ... [59]

Commented [RF39R3]: Haven't we been collecting this data for a few years now? CT continues to find 10-25 ... [56]

Commented [CJ39R4]: RIE Team - please take the recurring comments along this front as an indication ... [58]

Commented [RIE39R5]: Understood. Please see discussion above regarding CT.

The Company will continue to work on the issue of pre-weatherization barriers (PWBs) through improved data collection and analysis, seeking additional funding, and exploring partnerships. Some notable activities in this front include:

- Working to improve on and deliver data collection and reporting around the issue.
- The Company has applied for \$3M through RI Dept. of Environmental Management's (DEM) Priority Climate Action Plan (PCAP). We are waiting to hear back as the application is reviewed by the US EPA. Unfortunately, this application was not selected to be funded.
- The Company is exploring additional partnerships and funding sources such as the ⁴.
- Conducting additional research to learn how other Program Administrators and states around the nation handle the problem of PWBs.

The Company is exploring a moderate income enhanced incentive for the EnergyWise Single Family program, and

Pre-Weatherization Barriers

The Company will continue to work on the issue of pre-weatherization barriers (PWBs), including through improved data collection and analysis, seeking additional funding, and exploring partnerships.

Some notable activities on this front include working to improve on data collection and reporting around the issue, as well as conducting additional research to learn how other Program Administrators and states around the nation handle the problem of PWBs.

The primary initiative and change we believe would be most impactful is for RISE (as the Lead Vendor) to obtain remediation bids on behalf of the customer, in order to provide a full scope of work that includes the weatherization along with any required remediation. This full scope could then be submitted for the HEAT Loan. The Company will seek funding to enable this service.

Program data indicates that 75% of audits identify weatherization (Wx) opportunities. Of those 75%, 55% have one or more "hard barriers" that would require remediation for Wx to proceed. 75% of those "hard barriers" typically go unresolved. The most common barriers are knob and tube (K&T), and mold/mildew (M&M&). The estimated remediation cost is \$7,500 for K&T and \$3,600 for M&M. Assuming \$5,500 as an average. We have 6,000k gas audits and 2,000k electric heat audits planned for 2025. 2025 planned. Assuming the numbers above, we estimate 3,300 potential EWSF projects in 2025 with Wx opportunity but also hard barriers. We assume the average cost to remediate is \$5,500. Therefore, project management would be \$825 per home with barrier (15% admin cost of a \$5,500 job). That's \$2.7M in total admin, \$18.1M to remediate, \$20.9M combined. Note this doesn't include

⁴<https://www.providenceri.gov/mayor-smiley-announces-home-repair-program/>

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Commented [CJ40]: Some other things to consider:
-Improving how we help customers along the way
-To extent this goes in the right direction, include plans surrounding how Company would use grant funds from EPA it has applied for with DEM

Commented [RIE40R2]: Noted, thanks Craig. All g

Commented [RF40R3]: Is there any opportunity t

Commented [RIE40R4]: We do leverage LIHEAP a

Commented [G41]: Please provide a link

Commented [RIE41R2]: Added as footnote.

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Commented [G42]: Define MI

Commented [RIE42R2]: Defined.

Commented [CJ43]: What about moderate incom

Commented [RIE43R2]: We are looking into re-la

Commented [CJ43R3]: Good to hear that you are

Commented [RIE43R4]: We have added text with

Commented [G44]: Still haven't spoken to the free

Commented [CJ44R2]: To Glenn's point, it would

Commented [RIE44R3]: Updated.

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Commented [CJ45]: Some other things to consid

Commented [RIE45R2]: Noted, thanks Craig. All g

Commented [RF45R3]: Is there any opportunity t

Commented [RIE45R4]: We do leverage LIHEAP a

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Commented [CJ46]: Seek funding from whom?

Commented [RIE46R2]: Please refer to section 5.

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Delivered fuels Wx and doesn't include backlog. Therefore, the problem is significant and requires a substantial amount of money to help address.

The Company applied for \$3M through RI Dept. of Environmental Management's (DEM) Priority Climate Action Plan (PCAP). Unfortunately, this application was not selected to be funded. The Company is also exploring additional partnerships and funding sources such as the Providence Home Repair Program⁵ which is being administered by the Providence Revolving Fund.

The Company has identified other potential funding sources and we will continue to work towards a viable solution.

Moderate Income

The Company is considering a moderate-income enhanced incentive for the EnergyWise Single Family program. The intention is to provide 100% incentive for weatherization (Wx) of moderate-income (60-80% AMI) natural gas heated customers. We are working to refine our model to estimate the potential uptake, cost, and benefit of this approach and to ensure proper funding would be allocated.

The following are some of the current key modeling assumptions:

- 20% of the baseline gas weatherization (Wx) jobs would qualify
- An additional 240 Wx jobs might occur throughout the year over baseline
- The 240 additional Wx jobs would lead to and require accounting for increased audits, income verification, non-Wx measures (e.g., powerstrips, thermostats, pipe wrap, etc.), and program management.

Given the assumptions above, the current estimated cost of this offer would be approximately \$1.2M. Relative to the current baseline of \$12.4M, this would be an increase of 9.6%. The baseline of \$12.4M is already significantly elevated already year ——— over year (2025 plan vs 2024 plan) due to moving gas audits (and corresponding admin costs) to accrue on the gas side. -Due to this high anticipated cost, the Company intends to seek outside, non-SBC funds to offer this. With non-SBC funding, the Company can will also seek to offer this to all moderate-income customers regardless of fuel type (in this case, delivered fuels, since electric-heat customers already receive 100% incentive).

HEAT Loan

The Company is exploring revising the HEAT Loan. Options include a flat buy down (e.g. 5%), or maintaining 0% but at shorter terms based on income, similar to what Mass. is proposing. This would be

⁵ <https://www.providenceri.gov/mayor-smiley-announces-home-repair-program/>

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Commented [CJ47]: Would appreciate seeing some detail about what these potential funding sources are.

Commented [RIE47R2]: Please refer to section 5.4.3 of main text.

Commented [G48]: Define MI

Commented [RIE48R2]: Defined.

Commented [CJ49]: What about moderate income enhanced incentives. Consensus was that PUC is opening to putting this back on the table, just that it needs better support. We should absolutely work on that.

Commented [RIE49R2]: We are looking into re-launching a moderate income enhanced incentive.

Commented [CJ49R3]: Good to hear that you are looking into it, but would like to see some detail in the Plan about how a relaunch of this will be designed (if different from before) and what additional information you can provide to alleviate some of the concerns the PUC had when they disallowed it in the 2024 Plan.

Commented [RIE49R4]: We have added text with current thoughts and numbers. We welcome any feedback to anticipate/alleviate PUC concerns with MI programs.

Commented [CJ49R5]: For starters, I think the Company will need something in the BC Model that separates out this offering from the standards market rate offering.

Details about how Company will handle eligibility

Detail about how the Company would address concerns last year that were raised about potential for cost overruns

Commented [RIE49R6]: For a number of reasons (namely high cost and EWSF being negative \$10M in the 'new' Cost of Supply lens, and previous feedback from the PUC on this) we are pursuing nonSBC funds for this.

Commented [ML50]: Why just natural gas heated customers? All customers in this income range could benefit, couldn't they?

Commented [CJ50R2]: I'm certain we know the answer to this has to do with the PUC rulings. That said, we have to reiterate that we are not in favor of this approach an ... [76]

Commented [RIE50R3]: Yes this is targeted to natural gas because electric-heat is already 100% and DF bec ... [75]

Commented [RIE51]: Please note, this \$1.2M is not currently reflected in the 2nd draft BCR models. We a ... [78]

Commented [RIE51R2]: For a number of reasons (namely high cost and EWSF being - \$10M in the 'new ... [77]

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aimed at reducing costs (the interest rate buy down) that have escalated due to persistently high interest rates.

Additional Items

The Company will continue to emphasize electric weatherization and electric resistance heat to heat pump conversions. This includes a 100% incentive for weatherization of electric heat customers.

EnergyWise will continue to offer the 100% landlord weatherization incentive which encourages landlords to weatherize homes by removing any direct costs for the landlord. Renters then benefit with lower energy bills and a more comfortable home.

Commented [GR52]: Is this referring to both space and water heating conversions to HPs/HPWHs, or just space heating? If the latter, why not also water heating and HPWHs?

Commented [RIE52R2]: This is referring to space heating. 100% weatherization would apply only to homes with electric heat. RISE does not recommend upgrading electric DHW to HPWH.

Commented [G52R3]: Why does RISE not recommend upgrading electric DHW to HPWH? What are the current HPWH incentives for?

Commented [RF52R4]: I also question why you don't recommend HPWH for electric DHW. This represents a significant savings opportunity within the PUC guidance.

Commented [RIE52R5]: Apologies not sure how that last sentence made it in there but RISE lets people know about the HVAC offer (re: elec DHW to HP DHW).

Commented [RF53]: Can the assessments make recommendations to fuel switch from expensive oil and propane to heat pumps where doing so is cost-effective and note the OER's Clean Heat RI program and their rebates?

Commented [RIE53R2]: RISE provides recommendations and lets customers know about available and appropriate incentives, but it is not part of our measure package.

Commented [G54]: Are these Enhancements or Changes? They do not appear to be. Move this text into Implementation and Delivery.

Commented [RIE54R2]: These are recent enhancements/changes. We feel it is worthwhile to call them out in this section as they are relatively new and significant.

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3. Income Eligible Single Family (Electric and Gas)

3.1 Offerings

The Income Eligible Services (IES) Program offers a comprehensive, no-cost⁶, in-home (or virtual) home energy assessment services to increase comfort in the home and decrease a customer's energy costs.

Home Energy Assessment (HEA)

The IES Program will move to offering a comprehensive Home Energy Assessment (HEA) for the customer. In the past, the program offered the Appliance Management Program Assessment and a Weatherization and Heating System Assessment in two separate visits. The elements of these two offerings will be streamlined into one Home Energy Assessment (HEA), thereby increasing the services offered to the customer with a smaller time commitment than in the past. The move to a comprehensive assessment ensures that customers will receive a review of all their energy usage in a single visit and will have access to a full suite of program offerings. In specifics, the HEA will offer:

- The energy specialist educates Dedicated support from a BPI-certified energy auditor who 1) educates the homeowner or tenant about their energy bills and monthly usage 2) assesses the home and learns about the day-to-day activities that consume energy in the home 3) discusses ways the customer can save energy and money 4) educates/informs the customer on how to properly operate energy-efficient equipment and 5) explains to the customer how to identify signs that a indicate if weatherization/water heating system replacement, window air conditioning unit replacement, or heating system replacement, or weatherization is needed.
- A comprehensive assessment of the building envelope and heating and cooling systems. This includes visual and equipment-required inspections, infrared camera thermal imaging, and combustion safety testing of heating and water heating systems.
- Installation pgrades of instant energy savings measures such as advanced power strips, water saving measures (e.g., faucet aerators and low-flow showerheads), and WiFi thermostats.
- Evaluation of existing appliances including refrigerators, freezers, window air conditioning unit(s), clothes washers, and dehumidifiers to determine energy efficiency and eligibility for a no-cost replacement with an energy-efficient appliance model (including delivery and installation). An BPI-certified energy specialist conducts a comprehensive assessment of the building envelope and

⁶ 100% incentive via the systems benefit charge (SBC) that funds all Rhode Island Energy's energy efficiency programs. Customer incurs no cost for audit, weatherization, or equipment replacement. Income Eligible (IE) is funded roughly 20% by IE SBC and 80% by a mix of C&I and market rate SBC.

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Commented [RIE55]: From Acadia:	[81]
Commented [RIE55R2]: Looking at IE SF as a who	[80]
Commented [RF56]: Great move!	
Commented [ML57]: Excellent	
Commented [G58]: Spell out the first time	
Commented [RIE58R2]: Done.	
Commented [RF59]: What other benefits besides	[82]
Commented [RIE59R2]: Updated text.	
Commented [RF60]: Is this a different person than	[84]
Commented [RIE60R2]: No. Same person. Change	[83]
Commented [RF61]: Plural? They usually have m	[85]
Commented [RIE61R2]: Updated.	
Commented [RF62]: What about the cooling syste	[89]
Commented [RIE62R2]: We do have a protocol fo	[93]
Commented [G62R3]: What about taking advanta	[91]
Commented [RF62R4]: Or, what about replacing	[87]
Commented [DB62R5]: I didn't see anything abou	[92]
Commented [DB62R6]: @Lawrence, Spencer	[94]
Commented [L62R7]: This would be tricky - CAC	[86]
Commented [SL62R8]: We can look into CAC > HF	[90]
Commented [RIE62R9]: This would be tricky - CAC	[88]
Commented [RF63]: No solar PV assessment?	
Commented [RIE63R2]: This is not in scope for th	[95]
Commented [RF64]: Installation of...?	
Commented [RIE64R2]: Addressed.	
Commented [G64R3]: But only programmable	[102]
Commented [CJ64R4]: Should be both...BC Mode	[98]
Commented [SL64R5]: Needs response. Re: Wifi	[101]
Commented [DB64R6]: I changed this in the text	[100]
Commented [SL64R7]: @LeGrand, Carinel Joseph	[99]
Commented [64R8]: I have an email out and waiti	[97]
Commented [SL64R9]: Thanks Craig - you are rig	[103]
Commented [RIE64R10]: Thanks Craig - you are r	[96]
Commented [G65]: Clothes dryers too?	
Commented [RIE65R2]: We are not currently off	[105]
Commented [G65R3]: Again, what about end of	[104]
Commented [SL65R4]: We will look into it.	
Commented [RIE65R5]: We will look into it.	

~~heating and cooling systems including visual and equipment required inspections, infrared camera thermal imaging, and combustion safety testing of heating and water heating systems.~~

- ~~Air sealing, duct sealing, and insulation upgrades in attics, walls, and basements.~~
- No-cost replacement of eligible ~~heating, cooling, and/or water heating~~ or ~~cooling~~ systems if they are determined to be inefficient or unsafe. Applicable to ~~existing all-electric, natural gas, oil, and propane existing heating and~~ cooling systems; ~~electric, natural gas, oil, and propane.~~
- If a home has existing electric resistance heat, the customer will be offered a no-cost replacement to energy-efficient air source heat pumps that provide both heating and cooling.

3.2 Eligibility Criteria

The IES Program serves Rhode Island homeowners, renters, and landlords, who have a Rhode Island Energy account and meet any of the following criteria:

- Household income equal to, or less than, 60 percent of State Median Income levels which are set each program year⁷ or enrolled in Rhode Island Energy's fuel discount rate plans, Electric A-60 rate and/or Gas 11, 13 rates.⁸
- Customers enrolled in the federal Low-Income Home Energy Assistance Program (LIHEAP)⁹, also known as "fuel assistance".
- Homeowners and renters who live in a one-to-four unit building with either an electric or gas Rhode Island Energy Discount Rate account can participate, including customers with delivered fuel heat (oil, propane, wood, or coal) if they have an electric account.

Additional eligibility criteria, including the 50 percent rule,¹⁰ shelter and group home eligibility, renter eligibility and repair or replacement eligibility are available in the Rhode Island Weatherization Assistance Program (WAP/IES) Operations Manual. All criteria adhere to 10 CFR 440¹¹ requirements.

3.3 Implementation and Delivery

Program Delivery

⁷ <http://www.dhs.ri.gov/Programs/LowIncomeGuidelines.php>.

⁸ <https://www.nationalgridus.com/RI-Home/Bill-Help/Payment-Assistance-Programs>

⁹ <https://www.benefits.gov/benefit/1572>

¹⁰ Customers that are not on the income-eligible rate but live in a two-to-four-unit building where more than 50 percent of the units are income eligible are also eligible to receive weatherization and health and safety services. This exception is referred to as the "50 percent rule".

¹¹ <https://www.ecfr.gov/current/title-10/chapter-II/subchapter-D/part-440>

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Commented [G66]: Are window upgrades a measure?

Commented [RIE66R2]: We classify window repairs under "air sealing." As far as upgrades go, the state does have some window upgrade funds available. The Lead Vendor can work with the state to leverage the funding on an as-needed-basis.

Commented [G66R3]: Why "can" the LV work with the state? Shouldn't there be an expectation and requirement for the LV to do so when the opportunity arises?

Commented [RIE66R4]: Replace 'can' in the prior response with 'does'. RIE works with the LV, DHS, CAPs to leverage funding.

Commented [G67]: Space and water heating, or just space heating? If the latter, why not also water heating and HPWHs?

Commented [RIE67R2]: Updated in text to reflect water heating. We can upgrade indirect water heaters that run off boilers, but we do not replace stand-alone water heaters.

Commented [RF68]: Only one or the other? What if both are eligible?

Commented [RIE68R2]: Yes, both can be eligible. Updated in text for clarity.

Commented [GR69]: What about upgrades to HPWHs if electric resistance storage hot water is present?

Commented [RIE69R2]: Yes, we have done this in the past, but this is atypical given cold-climate considerations.

Commented [G69R3]: Please provide us with your protocols as to how this decision is made

Commented [RF69R4]: This is a missed opportunity. We don't understand why "cold-climate considerations" when a HPWH is enclosed within the thermal envelope and not exposed to outside. Please explain why replacing electric DHW with a HPWH is not a viable option, especially for IE customers.

Commented [DB69R5]: This was the response we received from Dave MacLellan. I think the explanation ... [106]

Commented [SL69R6]: We will look into electric DHW > HP WH. The uptake has been slow for market rate.

Commented [RIE69R7]: We will look into electric DHW > HP WH. The uptake has been slow for market rate.

Commented [ML70]: Has the Company examined differences—if any—between Area Median Income ... [108]

Commented [RIE70R2]: The low income rate uses LIHEAP as one option to qualify for the rate. The state ... [107]

The IES Program is administered jointly by the Company, the Lead Vendor, the Rhode Island Department of Human Services, and the six Rhode Island Community Action Program (CAP) agencies through a Lead Vendor that is responsible for managing the implementation of program work through the six Rhode Island geographically-based Community Action Program (CAP) agencies. The CAP agencies are embedded in their respective communities and serve as a trusted entities y where through which income-eligible customers can obtain essential resources within their respective community.

The CAP agencies implement the program work (i.e., weatherization and energy assessments) and tThe Lead Vendor monitors the overall work pipeline and timeliness of job completion. If of the CAP agencies. If a CAP agency determines they cannot complete their work pipeline of weatherization jobs, then they will refer the job to to either another CAP agency who can or to a third-party entity to perform the weatherization work. (this referral process is also in place for energy assessments). The Lead Vendor works closely with the CAP agencies to regularly review weatherization pipeline and timeliness of job completion. These referred jobs will be ultimately counted towards the referring CAP agency's participation and job completion goals, accounted for in the referring CAP agency's participation and job completion goals.

To manage program performance, the Lead Vendor tracks key performance indicators to measure and improve consistency of program delivery and to drive the CAP agencies to meet their goals. These indicators measure timeliness of administrative reporting, monthly and year-to-date spending compared to goals, uptake of new appliances and instant savings measures, electric and natural gas weatherization, and heating system installations and cost.

Furthermore, tThe IES Program holds quarterly Best Practices meetings with attendance from the Company, the Lead Vendor, the CAP agencies, DHS, program vendors, and/or speakers that can address a pertinent topic. This same group convenes monthly to conduct a general review of program performance and to coordinate best practices across the CAP agencies.

The Lead Vendor conducts additional coordination with home performance, HVAC contractors, and appliance vendors. These are the parties are responsible for installing weatherization, heating (space and hot water), window air conditioners, and appliance measures.

Program Promotion

The IES Program is mpromotedarketed through a marketing specialist, -cross-marketing at as well as cross marketed at community expos, via the Customer Advocates dedicated to the Rhode Island Income Eligible Services consumers, social media outreach, coordination with other non-profits in Rhode Island, and the Company's call center. The primary point for customers to enroll in the IES Program is through the CAP agencies as they provide income verification and comprehensive resources for income-eligible customers.

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Commented [RF71]: All of them? What if some underperform?

Commented [RIE71R2]: Yes, the Lead Vendor manages program delivery through each CAP agency. The Company and the Lead Vendor have taken steps to manage underperforming CAP agencies including providing third-party resources to help address backlogs.

Commented [RF72]: Who is this, the lead vendor or someone else?

Commented [RIE72R2]: Another qualified home energy auditor, not the lead vendor.

Commented [RF72R3]: Can you provide any more insight into who this is, what their certifications or credentials might be, whether this is bid out?

Commented [RIE72R4]: In most cases, this is RISE.

Commented [G73]: Is AMP activity still being tracked separately given the integrated HEA?

Commented [RIE73R2]: No, this is not being tracked separately. Updated text to make this clear.

Commented [GR74]: There should be some similar text above on tracking and reporting for EW-SF.

Commented [RIE74R2]: Noted.

Commented [G74R3]: But not added?

Commented [SL74R4]: Added text to EWSF section.

Commented [RIE74R5]: Added text to EWSF section.

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Commented [RF75]: Lots of "marketing"; how about "promoted through..."?

Commented [RIE75R2]: Updated.

The Company also promotes the IES program through its Consumer Advocates. The Consumer Advocates work in the community to identify and enroll income-eligible customers onto the A-60 low-income rate and help customers identify options to make their bills more affordable. They work across CAP agencies and senior citizen advocacy and service organizations to make sure that customers are aware of and utilizing all available programs and services. A specific, energy-efficiency-focused (EE) focused Consumer Advocate also works closely with community partners to provide awareness of energy efficiency programs. The ~~lifesis~~ EE Consumer Advocate represents low-to-moderate income energy efficiency customers to help inform and influence the design of the Company's programs.

The Lead Vendor monitors the work of the CAP agencies. If a CAP agency determines they cannot complete their pipeline of weatherization jobs, then they will refer the job to either another CAP agency who can or to a third-party entity to perform the weatherization (this referral process is also in place for energy assessments). The Lead Vendor works closely with the CAP agencies to regularly review weatherization pipeline and timeliness of job completion. The referred jobs will be accounted for in the referring CAP agency's participation and job completion goals.

Key Performance indicators are tracked to measure and improve consistency of program delivery as well as drive performance of the CAP agencies and include timeliness of administrative reporting, monthly/year to date spending compared to goals, participation numbers for the Appliance Management Program assessment, electric and natural gas weatherization and heating system installations and cost.

Quarterly IES Program Best Practices meetings are held with the Company, the Lead Vendor, the CAP agencies, DHS, program vendors, and/or speakers to address a pertinent topic.

Monthly engagement of the Company, the Lead Vendor, Executive Directors of the CAP agencies, and the State of Rhode Island's Department of Human Services (DHS) to review the overall performance of the IES Program and coordination of best practices across the CAP agencies.

The Lead Vendor also coordinates with home performance, HVAC contractors and appliance vendors responsible for installing weatherization, heating (space and hot water), window air conditioners, and appliance measures.

Customer Journey

- A customer begins the process for a no-cost home energy assessment by contacting (~~iee.g.~~ phone, call/in-person, online through CAP and RI Energy websites) t their local CAP agency to submit their information to determine if they meet the income eligibility requirements for participation in the IES Program. Customers learn about the program through the outreach efforts by the Company and the

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Commented [RF76]: Who is this, the energy specialist?

Commented [CJ76R2]: Noting that it is separate from the energy specialist. That said, it might be worth defining the Customer Advocate somewhere.

Commented [RIE76R3]: Added a section on Consumer Advocates to help define and explain role.

Commented [RF77]: No cooling?

Commented [RIE77R2]: Cooling in some instances > window air conditions, central AC not cost-effective; Heat Pump cold climate heat pump provide heating and air-con.

Commented [G77R3]: But HPs are only installed displacing CACs when there is electric heat, correct?

Commented [RIE77R4]: Correct.

Commented [RF78]: I'm confused about which of these services is provided by the lead vendor and which by the CAPS. Please clarify.

Commented [RIE78R2]: Added some more detail to help explain.

Commented [RF79]: Any web/internet/email options?

Commented [RIE79R2]: Yes, updated text to reflect.

CAPS, detailed above. Customers learn about the program through outreach from their local CAP agency or from Rhode Island Energy.

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Commented [RF80]: I thought the lead vendor was providing most of these services?

Commented [RIE80R2]: Clarified.

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- With oversight from the Lead Vendor, CAPs provide the full suite of energy efficiency services including:

- Income-eligibility verification
- Customer education regarding energy and cost savings opportunities
- Energy assessments
- Installation of instant energy savings measures
- Recommendations for further energy savings measures

- After the CAP agency verifies income eligibility, the CAP will schedule a no-cost home energy assessment.

- The CAPs provide CAPs provide the full suite of energy efficiency services including:

- Income-eligibility verification.
- Customer education regarding energy and cost savings opportunities.
- Energy assessments.
- Installation of instant energy savings measures.
- Recommendations for further energy savings measures.

- eEnergy education is provided to the customer regarding the pre-and-post energy assessment process, opportunities to save energy, processes for receiving appliance or heating/cooling system upgrades and/or weatherization.

- After installing instant energy savings measures, the CAP agency will schedule all necessary follow-up services for insulation (includes duct/pipe), air sealing, duct sealing, appliance and eligible heating, cooling and hot water system replacements. To conduct this work, the CAPs draw from a list of qualified and background-checked contractors maintained by DHS.

- If needed, the CAP will also provide health and safety services. will be provided The services including replacing smoke and carbon monoxide detectors if they are non-functioning or expired, cleaning a-and

Commented [RF81]: So cooling IS included. That's not always clear above.

Commented [RIE81R2]: Updated text in prior sections in an attempt to clarify.

Commented [GR82]: And duct sealing?

Commented [RIE82R2]: Yes, added to text for clarity

Commented [RF83]: Why no discussion about ductless air conditioning as there was for EnergyWise? IE customer homes have a much higher prevalence of barriers than market-rate homes. This service should be a priority as discussed above.

Commented [CJ83R2]: To this end, I wonder if it might make sense to carve out a section on PWB specifically, as they are prevalent and applicable to each of the EW, IES, and MF programs.

Commented [RIE83R3]: These services do exist and are well-integrated into the IES program. Added a section to summarize the process.

tuning heating systems, and addressing conditions such as mold before the energy efficiency work is able to be completed

- In several cases, these health and safety items prevent weatherization projects from moving forward, at which point they are considered pre-weatherization barriers (PWBs). The Company designates 2% of the IES program funds to address PWBs, and it also leverages funding sources from LIHEAP, the Bipartisan Infrastructure Law (BIL), and DHS/WAP others to help address these issues and reduce pre-weatherization expenses that customers face. During the home energy assessment, the CAPs identify PWBs, estimate repair costs and remediation eligibility, and then work with the Lead Vendor and the Company to process the request to remediate these PWBs. Once the request is approved, the CAPs complete the PWB work in accordance with local permitting requirements and historic preservation protocols. After the PWBs are addressed, the weatherization work can move forward. Final inspection for PWB work is included in final inspection of the weatherization work.

After installing instant energy savings measures, the CAP agency will schedule all necessary follow-up services for insulation (includes duct/pipe), air sealing, duct sealing, appliance and eligible heating, cooling and hot water system replacements. To conduct this work, the CAPs draw from a list of qualified and background-checked contractors maintained by DHS.

- Funding for weatherization and eligible heating, cooling, and hot water system replacements are leveraged with WAP and LIHEAP. All services, and appliances, and eligible heating, cooling, and hot water system replacements are provided at no cost to the customer.
- Customer receives a "comment card" to provide their feedback on all aspects of their journey through the IES Program.

An independent, third-party company provides quality control and quality assurance to at least 5 percent of all assessments and weatherization projects.

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Commented [RF84]: Asbestos? What is the system and process for addressing PWBs? We need to be more proactive and set up a system to address this issue.

Commented [RIE84R2]: These services do exist and are well-integrated into the IES program. Added a section to summarize the process.

Commented [RF85]: How often? Have you been collecting the data and can it be provided?

Commented [RIE85R2]: We are currently working on collecting the data.

Commented [RF86]: Like who else? Is it enough to be meaningful and impactful?

Commented [RIE86R2]: 2% of IESF budget allocated to PWBs

Commented [GR87]: Good, but how sufficient is this funding to fully address PWBs? What is the prevalence of s in this population?

Partially, but not fully addressed below

Commented [RIE87R2]: The IES program is leveraging multiple sources of funding, including program funds, to address PWBs and continues to look for more external funding.

Commented [RF87R3]: To Craig's suggestion, it might be good to put in place a process including the state and others to develop a more robust process to address these issues.

Commented [RIE87R4]: We agree, it's a big issue ... [109]

Commented [RF88]: Good. What does this include ... [112]

Commented [SL88R2]: It includes a variety of the ... [110]

Commented [RIE88R3]: It includes a variety of the ... [111]

Commented [GR89]: And duct sealing?

Commented [RIE89R2]: Yes, added to text for clarity

Commented [RF90]: Not cooling systems or hot ... [114]

Commented [RIE90R2]: The funding can cover c ... [113]

Commented [RF91]: Oh, heating and cooling nov ... [115]

Commented [RIE91R2]: Re-visited text through ... [116]

Commented [G91R3]: The discussion on these e ... [117]

Commented [RIE91R4]: Thank you. Really helpful.

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3.4 2025 Program Enhancements, Changes, and Notable Items

In 2025, there are several key themes for the Income Eligible Single Family (IE SF) program:

Appliances

The Company is working on several improvements to appliance measures and delivery. To start, Rhode Island Energy we will move from a Massachusetts-based appliance replacement scheduler to a centralized, Rhode Island CAP scheduler, centralized at one CAP agency. Furthermore, the Company plans we plan to leverage its our Lead Vendor's experience in appliance delivery to realize bulk purchase of appliances at discounted costs. The Company Lastly, we will also be on-boarding additional RI appliance delivery vendors.

Pre-Weatherization Barriers (PWBs)

The Company will continue to work on the issue of pre-weatherization barriers (PWBs) through improved data collection and analysis, seeking additional funding, and exploring partnerships. Please note the IE SF program already provides significant assistance on this front, as detailed in Section 3.3 above. Nevertheless, for such a complicated issue, further work is always needed. Some notable activities on in this front from the Company include:

- Working to improve on and deliver data collection and reporting around the issue. Developing more robust tracking and reporting capabilities with the Lead Vendor and CAPs
- Beginning to publicly report on PWBs in quarterly reports
- The Company has applied for \$3M through RI Dept. of Environmental Management's (DEM) Priority Climate Action Plan (PCAP). We are waiting to hear back as the application is reviewed by the US EPA.
- Exploring The Company is exploring additional partnerships and funding sources such as the Providence Home Repair Program.
- Conducting additional Conducting ongoing research to learn how other Program Administrators and states around the nation handle the problem of PWBs.

Equity

We plan to continue building upon equity work, commitments, and tracking. Please refer to the Main Text, Section 2.6.1 (Equity) for further discussion details on this topic.

General Program Improvement

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Commented [CJ92]: Would like to see more here about what we plan to do about struggles with hitting weatherization goals specifically in this program.

Commented [RIE92R2]: We are hiring additional energy auditors and program staff to support the weatheri ... [123]

Commented [RF92R3]: Please explain how these ... [121]

Commented [RIE92R4]: Demand is not currently ... [120]

Commented [CJ92R5]: I'm skeptical that operati ... [122]

Commented [RIE92R6]: OK.

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Commented [SC93]: Just asking in response to fe ... [124]

Commented [RIE93R2]: Our understanding from ... [125]

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Commented [SC94]: How many are targeted?

Commented [RIE94R2]: The goal is to have up to ... [126]

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Commented [CJ95]: See other comments on Pre ... [127]

Commented [RIE95R2]: Thank you.

Commented [SA96]: Please spell out acronyms

Commented [RIE96R2]: Done

Commented [CJ97]: Some other things to consid ... [129]

Commented [RIE97R2]: Noted, thanks Craig. All ... [131]

Commented [RF97R3]: What are your plans to s ... [128]

Commented [RIE97R4]: IE SF provides many ser ... [130]

Commented [RF98]: These are all good, but may ... [133]

Commented [RIE98R2]: Thanks, a dedicated wor ... [132]

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Commented [RF99]: These sound like good capa ... [136]

Commented [RIE99R2]: Demand is not currently ... [135]

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~~Build upon and continue flexible program delivery by allowing overflow vendor and inter-agency referrals.~~

~~In an effort to~~The Company is pursuing several strategies to ~~continually~~continuously improve the program and ensure ~~that it meets its goal~~we are hitting goals, ~~the Company has pursued several strategies.~~ Notably, ~~the CAPs~~We ~~will~~are hiring additional energy auditors and program staff to support the weatherization programs, specifically at the Blackstone Valley CAP and the CAP of Providence. ~~A third-party vendor will also support these CAPs to help them meet demand.~~ ~~The Company also continues to build upon flexible program delivery by allowing overflow vendor and inter-agency referrals.~~

~~We are updating~~In addition, the Company is updating the ~~workflow~~ workflow processes to be more efficient. ~~One key enhancement is that office staff will take on additional clerical data input that was previously tasked to auditors, including requiring less clerical data input from auditors and instead handing that off to office staff.~~ This process improvement ~~is~~ will allow ~~auditors~~ staff to handle ~~additional more~~ audits in ~~a faster~~ less time frame.

In 2025, the Company is also exploring a partnership with a local healthcare network where ~~it~~we will train community health advocates (*"navigantes de salud"*) to ~~refer patients to Rhode Island Energy's programs for a free energy audit of their homes.~~ These community health advocates ~~will specifically work with patients that have energy insecurity and shutoff concerns.~~ ~~sign up patients with utility needs for a free energy audit of their home.~~

Heat Pump Conversions

~~During the PUC's open meeting regarding the 2023 Annual Energy Efficiency Plan in Docket no 22-33-EE, the PUC directed that Rhode Island Energy develop a plan to achieve 750 units of electric resistance heat (ERH) to air source heat pump (ASHP) conversions annually by 2025, with 25% of those customers served being income eligible. In 2025, the Company has a goal of upgrading 190 income eligible electric heat customers.~~ The Company will ~~continue to~~ work towards ~~hitting its targets through continued marketing, education, and outreach through the CAP agencies for electric resistance heat to heat pump conversions.~~ In 2024, the Company has seen an uptick in demand for ASHPs in certain communities as ~~customers better understand and experience the benefits of the technology and educate their friends and family.~~ ~~In 2025, the Company~~ Please ~~see the~~ Company's Electric Resistance Heating to Air Source Heat Pumps: Implementation Plan for the Income Eligible Sector, ~~submitted to the PUC in 2023, for additional detail.~~

Outside Funding & Coordination

- PCAP Grant: ~~The Company applied for \$3M through RI Dept. of Environmental Management's (DEM) Priority Climate Action Plan (PCAP) to be used to address pre-weatherization . Unfortunately~~ barriers. Unfortunately, this application was not selected to be funded.

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Commented [GR100]: Is RIE hiring the staff at the LV and/or CAPs?

Commented [RIE100R2]: No.

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Commented [GR101]: Unclear as to what this means

Commented [RIE101R2]: Tried to clarify in text.

Commented [G102]: "home energy assessment"

Commented [RIE102R2]: "thanks"

Commented [ML103]: Sounds promising

Commented [RIE103R2]: Thanks, we are looking forward to building out this partnership.

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Commented [RF104]: How? More detail, please.

Commented [CJ104R2]: As it reads now, this isn't really a change or enhancement. What is going to change or be enhanced to make sure this happens?

Commented [RIE104R3]: CCAP is fully engaged in marketing and outreach here. They're seeing upticks in demand due to outreach efforts, word-of-mouth education, and greater trust from the community.

Commented [GR105]: Space and water heating, or just space heating? Should be both.

Commented [CJ105R2]: Please include similar language to what is included in earlier sections with respect to the ER HP plan the Company had to put together to be responsive to the PUC Order.

Commented [RIE105R3]: Air source heat pumps per the PUC Order.
We also added language to clarify and provide more detail.

Commented [ML106]: Could more info be supplied here? By.... direct mail, leveraging community partners, etc.

Commented [RIE106R2]: Added more detail in text.

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Commented [RF107]: For what? What are the plans?

Commented [RIE107R2]: Added some detail.

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- IRA: IRA has significant carve outs for low-income customers. The Company will continue to coordinate with OER on this initiative. Please refer to the Main Text, Section 5.4 (Coordination with State and Federal Incentive Programs) for further discussion on this topic.
- LIHEAP / WAP: The Company will continue to leverage outside funding such as LIHEAP and WAP to further energy efficiency goals and serve customers.

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Commented [RF108]: More discussion please. Spread over 8 years, how "significant" will the IRA funds be? Do you know they will be available for RIE programs?

Commented [RIE108R2]: At this point all indications from OER are that no IRA money will be made available to RIE programs.

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Commented [RF109]: This could use more discussion. What is the plan?

Commented [RIE109R2]: This is already happening through the IE programs that are coordinated with DHS.

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4. Multifamily (EnergyWise and Income-Eligible, Electric and Gas)

4.1 Offerings

The Multifamily Program offers comprehensive energy services for multifamily customers (buildings with 5+ dwelling units), including:

- Energy assessments-
- Incentives for efficient electricity, natural gas, or delivered fuels equipment including heating, cooling and domestic hot water systems, cooling equipment, thermostats, smart strips, water saving measures, common-area lighting, and eligible air source heat pumps-
- Weatherization measures including air sealing and insulation where eligible and applicable
- Coordination of all services for all services will be offered for multifamily properties that participate in the mMarket r-Rate and iIncome eEligible mMultifamily pPrograms.

Commented [RF110]: What about insulation, air sealing, duct sealing? Are we doing any more lighting in any common spaces? What about appliances?

Commented [RIE110R2]: We do offer air sealing, duct sealing, and insulation (added to text). We are doing common-area lighting. Appliances are not currently in the plan due to cost-effectiveness considerations, but we are continuing to explore options.

Commented [G110R3]: Lack of appliance replacement is questionable/curious

Commented [CJ110R4]: We have some level appliance replacement in IES SF, so agree its curious that it wouldn't at least be doable for IES MF.

Commented [RF110R5]: What about central heating and water heating systems?

Commented [RIE110R6]: Yes we do central heating and hot water. Only option seems like it would be fridges and I think those should be re-evaluated. Need to check when last study was. If you all have specifics and examples, let us know.

Commented [ML111]: Please indicate right at the beginning that this applies to 5+ units

Commented [RIE111R2]: Added to text.

Commented [GR112]: Are row house type buildings, particularly when individual units are owned, treated as SF or MF?

Commented [RIE112R2]: Multi

4.2 Eligibility Criteria

Eligible multifamily program participants are defined as the following:

- Buildings that contain with five or more dwelling units.
- Properties consisting of four or more one-to-four-unit buildings that meet both of the following requirements:
 - Are within a reasonable geographical distance¹² from each other, or to a five plus unit building, and
 - Are owned by the same individual or firm.

Both market-rate and income-eligible multifamily properties are subject to the above multifamily eligibility requirements for coordinated services. Customers with any heating fuel type, including delivered fuels, are served (so long as they have a Rhode Island Energy account).

For income-eligible properties, co-payments for energy efficiency services and measures will be waived. The income-eligible multifamily sector is defined by properties that meet one of the following criteria:

Commented [RF113]: This is good as it overcome the financial barrier of the split incentive issue. There are still administrative and technical barriers to focus on and resolve, but the financial one is huge.

Commented [RIE113R2]: Thanks

¹² "Reasonable geographic distance" is determined at the discretion of the vendor. The prior program guidelines required buildings to be neighboring each other. This revised guideline will allow the vendor to treat more units for a single owner where those units may be located down the street from each other.

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- Owned by public housing authorities or community development corporations;
- Receive affordable housing tax credits or other types of low-income funds/subsidies from the state or federal government; or
- Consist of building units where 50 percent or more of occupants receive utility service on the A-60 (Low-income) rate.

A multifamily property may be eligible for services and incentives under both residential and commercial programs. As an example, a building with 20 dwellings that is electrically sub-metered (20 residential accounts) with a commercial electric account for common areas and one commercial gas account serving a central heating/hot water system will likely qualify for incentives through both Multifamily and the Commercial & Industrial Multifamily Programs (see section 6 of Attachment 2). While this adds a layer of complexity for the Company, it is critical that the Company maintain accounting via these various program budgets to ensure equity for all customers, funding projects through the energy efficiency program charge. In contrast, customers do not experience this added layer of complexity and receive a consolidated incentive for all efficiency work completed at the site. The Program's Lead Vendor is well versed in managing projects with multiple types of multifamily designations and [helps](#) the customer navigate the process of participating in both programs.

4.3 Implementation and Delivery

The Rhode Island Multifamily Program has a [single Lead Vendor](#) that utilizes a network of Rhode Island subcontractors to serve all customers, including income-eligible customers. A customer can learn about the Company's Multifamily Program offerings in a myriad of ways ranging from communicating directly with the Lead Vendor, accessing the Rhode Island Energy website, direct mail and print marketing, and digital marketing campaigns. The Lead Vendor also conducts direct outreach to help enroll customers in the programs and increase participation.

If the customer or landlord is interested in starting the process, the Lead Vendor would perform an eligibility assessment and then schedule an [in-home](#) energy assessment. The Lead Vendor then conducts post site screening to identify which measures pass a benefit/cost (B/C) screening on a project level basis. If a measure does not pass, customers can still include it in the project without an incentive.

A final proposal is then presented to the customer that includes the scope of work, costs, available incentives, and an estimated time frame. The customer is made aware of financing options available to them as well. If the customer decides to proceed with the project, installation work is then scheduled. [Once installation work is completed, a final walk through with the customer is done.](#) A completion report is then created and presented to the site's authorized representative and signed off on. A customer survey is also conducted once the work is complete.

Individual condo owners within the Multifamily Program are eligible for financing under the HEAT Loan.

Commented [RF114]: Can or will? This is key to have a single point of contact to navigate these programs for the building owner. You may want to elevate this role and the importance of it.

Commented [RIE114R2]: Updated language.

Commented [RF115]: Play up the single point of contact who can access not only the res and C&I programs but also other available program resources (like IRA and other federal funds).

Commented [RIE115R2]: We monitor other funding sources and work with our vendors to help customers access outside resources if available and applicable.

Commented [RF116]: Home or multifamily?

Commented [RIE116R2]: Updated in text.

Commented [RF117]: I hope we are not screening individual measures. Maybe clarify that if the project does not screen, measures are excluded until the remaining package of measures screens for the project.

Commented [RIE117R2]: Confirming with lead vendor but screening is at project level.

Commented [GR118]: Even if attic insulation were to be installed in a single unit? Is a walk through necessary in such - and similar - instances?

Commented [RIE118R2]: Yes. Walkthroughs are an important touch point with program participants.

Commented [G118R3]: Still not clear what this post-installation visit is supposed to accomplish. Is there a QA component to it?

Commented [SL118R4]: A post install visit is to make sure for all parties work is done well and to satisfaction. Not sure why this is a controversial point. It also helps reduce customer complaints down the road, which we have very few of.

Commented [RIE118R5]: A post install visit is to make sure, for all parties, work is done well and customer is satisfied. In our experience it also helps reduce customer complaints.

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An independent third-party company provides quality control and quality assurance to at least 5 percent of all assessments and weatherization projects.

4.4 2025 Program Enhancements, Changes, and Notable Items

In 2025, the Company seeks to continue or start several strategies to foster improvement in the multifamily programs. These strategies include creative techniques to incentivize vendor performance, ease financial obstacles for customers, and provide targeted education and outreach to landlords and tenants.

In 2024, the Company established performance incentives with the multifamily Lead Vendor to help improve program performance. 2025 will be the first full year of operation with performance incentives in place.

As another tool to address any program underperformance in 2025, the Company may also be exploring implementing an enhanced, 100% weatherization incentive for eligible multifamily properties. Eligibility currently requires that where all occupants are renters, so long as the overall project remains cost effective.

The Company will work with the Consulting team in 2025 to discuss possible dedicated strategies for different property types.

The Company plans to continue its efforts to pursue creative go-to-market strategies for multifamily energy efficiency. There is an ongoing opportunity to better educate multifamily property owners, landlords, and tenants about energy efficiency opportunities. In 2024, Rhode Island Energy launched a landlord outreach initiative in collaboration with the City of Central Falls and community-based organization Progreso Latino to promote energy efficiency directly to landlords. As part of this assessment, the Company is collaborating with its partners to deliver targeted marketing campaigns to multifamily tenants and landlords in Central Falls. The Company also plans to hold listening sessions with Central Falls landlords to better understand their barriers to participating in Rhode Island's energy efficiency programs. These sessions will allow the Company to educate landlords about the opportunities available to them, advocate options for energy efficiency in response to landlords' concerns, and ultimately build trust in the local community. In 2025, the Company will expand upon this assessment by scaling to different communities while continuing to test new outreach opportunities. The goal is to apply the learnings from Central Falls and replicate the successes. Please see Attachment 8 for more details.

To address upfront cost barriers, The Company also intends to continue its 2024 assessment with the BlocPower. Through this assessment, the Company is testing an alternative financing model to fund residential multifamily building projects. Please see more details about BlocPower and this multifamily financing assessment in Attachment 8.

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- Commented [RF119]: These sound like small two ... [141]
- Commented [RIE119R2]: Thanks for the feedback ... [140]
- Commented [CJ120]: Would like to see dedicated ... [144]
- Commented [RIE120R2]: We'll talk about it with ... [145]
- Commented [CJ120R3]: Okay, if they don't think ... [142]
- Commented [RIE120R4]: We will continue to ex ... [143]
- Commented [CJ120R5]: This is something we ca ... [146]
- Commented [RIE120R6]: Added text. The C&I ar ... [147]
- Commented [RF121]: Are we locked into RISE fo ... [150]
- Commented [RIE121R2]: Vendor contracts are p ... [151]
- Commented [CJ121R3]: But MF and EW at least ... [149]
- Commented [RIE121R4]: Thanks Craig. Contract ... [148]
- Commented [CJ122]: Noting that we discussed t ... [155]
- Commented [RIE122R2]: These are locked in at ... [153]
- Commented [CJ122R3]: Understood. It's unfortu ... [154]
- Commented [RIE122R4]: It's locked in at this po ... [152]
- Commented [CJ123]: Please elaborate. What do ... [156]
- Commented [RIE123R2]: This is accounted for li ... [157]
- Commented [RF124]: No weatherization measu ... [159]
- Commented [RIE124R2]: Added some weatheri ... [158]
- Commented [CJ125]: How will the Company dete ... [162]
- Commented [RIE125R2]: This was modeled afte ... [163]
- Commented [CJ125R3]: Okay, leaving open in h ... [160]
- Commented [RIE125R4]: We are trying this out ... [161]
- Commented [SC126]: I support this plan as a str ... [164]
- Commented [RIE126R2]: The idea comes from ... [166]
- Commented [ML126R3]: While still evolving, the ... [165]
- Commented [RIE126R4]: Thanks for the info. ... [167]
- Commented [RF127]: Is this going to be enough ... [168]
- Commented [RIE127R2]: These are all good que ... [167]
- Commented [RF128]: Good start. How about ... [169]
- Commented [RIE128R2]: Will consider following ... [170]
- Commented [RF129]: If you are billing these as ... [171]
- Commented [RIE129R2]: Great. Thanks. ... [171]
- Commented [ML130]: This seems like a great ap ... [174]
- Commented [RIE130R2]: Thanks ... [174]
- Commented [ML130R3]: It's really important th ... [173]
- Commented [RIE130R4]: Those are good points ... [172]
- Formatted ... [175]
- Commented [CJ131]: Noting that this was refere ... [183]
- Commented [RIE131R2]: Updated ... [183]
- Commented [SC132]: I would like to hear more ... [178]
- Commented [RIE132R2]: We are still in contract ... [182]
- Commented [SC133]: I would like to hear more ... [176]
- Commented [ML133R2]: Please expand at least ... [177]
- Commented [RIE133R3]: Please see DPA attachment. ... [177]
- Commented [SA134]: Can we get an update on t ... [180]
- Commented [RIE134R2]: We are still in contract ... [179]
- Commented [GR134R3]: Provide a brief footnot ... [181]
- Commented [RIE134R4]: See attachment 8. ... [181]
- Commented [CJ135]: We would like to see more ... [184]

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The Company is exploring several other ideas to innovate on the Multifamily Program in 2025 including:

- Wide-ranging outreach and awareness marketing campaigns
- Surveys, market research, and direct outreach to housing authorities
- Engaging with landlord associations and multifamily building owner industry groups
- Re-visiting the measure mix and program offerings based on market demand

Commented [RF140]: All good ideas. We may want to also explore ways to figure out when buildings go through refurbishments or planned maintenance and interject at that time. For affordable projects, there is usually a scheduled upgrade on a regular schedule funded with a reserve fund. If we can work with the property managers and agencies to piggyback on that planned maintenance to do energy upgrades at the same time, there may be some synergistic opportunities.

Commented [RIE140R2]: Thanks Richard, great points - we already do this.

Commented [CJ141]: My hope is that these will be a little more fleshed out in the final draft.

Commented [RIE141R2]: Craig if you have any specific ideas like Richard supplied above please let us know.

Commented [ML142]: Housing authorities are a great way to get to LIMF properties, but please be sure that naturally occurring affordable housing is a focus too. Those are the hardest to get into the program and in many instances the most in need of assistance.

Commented [RIE142R2]: Agreed. Naturally occurring is part of this outreach effort.

Commented [ML143]: Great. I encourage you to also explore opportunities for co-delivery of non-program measures such as water efficient toilets.

Commented [RIE143R2]: Thanks.

5. Residential High-Efficiency HVAC and Hot Water Programs (Electric and Gas)

5.1 Offerings

The High-Efficiency Heating, ~~Ventilation~~ Ventilation, and Air Conditioning (HVAC) ~~Cooling, Ventilation~~ and Hot Water Programs (often referred to the “Residential HVAC” or just “HVAC” program for short) ~~HVAC and Hot Water Program~~ promotes and incentivizes the installation of high-efficiency electric and gas equipment through the following rebates and services:

Customer rebates on energy-efficient equipment:

- Boilers
- Combined condensing boilers
- Furnaces
- **ENERGY STAR** Most Efficient windows
- Hot water heaters
- Air source heat pumps (central and ductless)
- Air source heat pump water heaters
- Smart thermostats
- Water saving devices
- Boiler ECM pumps

Contractor services:

- Quality installation verification
- Contractor training
- Contractor incentives
- Upstream incentives (discount taken at the distributor level)

The HVAC and Hot Water Program is cross-promoted through the following programs: EnergyWise, Multifamily, Residential New Construction, and Home Energy Reports. Training elements and best practices of the program are also provided to the IES Program to maintain consistency in contractor skills for accurate sizing, design, installation, and performance verification of high-efficiency HVAC systems.

5.2 Eligibility Criteria

The HVAC and Hot Water Program serves all residential customers. Energy-efficient equipment must be installed by a licensed heating or cooling contractor or plumber.

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Commented [GR144]: Though HVAC stands for “Heating, Ventilation and Air Conditioning”

Commented [RIE144R2]: Updated.

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Commented [RF145]: How long will we be incentivizing gas equipment? Is this fully driven by the PUC or can we say something about future plans here? MA and CT have and are phasing out gas incentives for most equipment in the next three year plan.

Commented [RIE145R2]: We don't have a specific timeline. MA was based on legislation and CT was based on regulatory direction. We assess the market each year in our annual plan and in our 3-year plans.

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Commented [RF146]: If this means “ENERGY STAR”, then it would help to be specific. Otherwise, this means European Passive House R-5 windows to me.

Commented [RIE146R2]: Edited.

Commented [GR147]: Should water source heat pumps be added to this list as in MA and CT? Though not a lot of program activity to date.

Commented [RIE147R2]: We will investigate this as a potential inclusion in next year's plan.

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Commented [RF148]: It is probably time to recognize contractors who are trained and engaged with the p ... [194]

Commented [RIE148R2]: The HVAC program ma ... [193]

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Commented [RF149]: Any plans for a qualified co ... [195]

Commented [RIE149R2]: RIE has a qualified part ... [196]

Commented [RF149R3]: See comments about E ... [197]

Commented [RIE149R4]: See above.

Commented [GR150]: Good

Commented [RF151]: Should we look at an insta ... [199]

Commented [RIE151R2]: RIE has a qualified list ... [198]

Commented [RF151R3]: Are they empowered a ... [200]

Commented [RIE151R4]: Yes

5.3 Implementation and Delivery

The HVAC and Hot Water Program is administered by a Lead Vendor that is responsible for contractor training, maintaining distributor relationships, tracking data, providing content for marketing, and documenting monthly, quarterly, and annual energy savings. The Lead Vendor works closely with the Company to deliver the HVAC and Hot Water Program and provides strategic insight for program improvements.

Contractor training and education is a primary component of the HVAC and Hot Water Program to ensure accurate sizing, design, installation and performance verification of heating, cooling, and hot water equipment and results in energy savings and customer satisfaction.

The Lead Vendor provides regular communication and in-store visits with distributors to provide training and information on the equipment and solicit feedback on customer interactions. The Lead Vendor also ensures distributors have proper promotions and marketing signage within the distribution stores.

The Company and Lead Vendor work with manufacturers to develop special offers, or “flash sales”, to further incentivize customers to participate in the HVAC and Hot Water Program to gain the benefit of the energy savings.

Product channels for ease of customer use and for product adoption:

- HVAC contractors during routine maintenance service, emergency service, or contractors’ marketing communications
- Residential New Construction/Major Renovation [energy advisors projects can leverage the HVAC programs to provide expertise and additional support](#) during project design consultation.
- Upstream and midstream incentives.
- Comprehensive RI Energy marketing channels including emails, HERs, bill inserts, and radio and media advertisements.
- RI Online Marketplace (www.RIEnergyMarketplace.com) offers customers the ability to purchase instant discount rebates on energy-efficient thermostats and water fixtures.
- The program supports a combination of upstream and midstream incentives as well as post-purchase consumer incentives. The upstream and midstream incentives encourage retailers, distributors, and manufacturers to support ENERGY STAR products with increased production and availability of products. Consumer incentives are designed to bring efficient product costs in line with less efficient equipment, thereby encouraging the adoption of the more efficient item.
- The HER Program sends communications to electric customers promoting [both](#) air source heat pumps [and water heating](#) as ~~an~~ energy efficiency solutions.
- The Company markets to all residential customers to make them aware of incentives available for heat pump water heaters and updates HVAC contractors on the offering.

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Commented [GR152]: What are QA/QC processes, if any, for this program?

Commented [RIE152R2]: RIE inspects 5% of all systems and 100% of all projects that receive enhanced incentives regarding electric baseboard replacements

Commented [RF153]: Is there a sizing requirement included for any equipment? How is sizing documented?

Commented [RIE153R2]: Requirements listed on RIE website

Commented [GR154]: Is any of this training required for contractor participation? If not, should it be?

Commented [RIE154R2]: Training is not required for all, but RIE does require that contractors be on the RIE contractor list to do electric resistance to heat pump upgrades that have enhanced rebates

Commented [RF154R3]: This might be a good opportunity to partner with manufacturers to ensure training and then promotion of contractors.

Commented [RIE154R4]: Noted

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Commented [RF155]: Can we keep qualifying equipment on the truck or in stock for emergencies?

Commented [RIE155R2]: Given that HVAC and DHW is not a ‘one size fits all’ - this is an interesting idea but not feasible logistically .

Commented [RF155R3]: Chris Badger of VEIC presented on California’s 120 volt emergency water heater replacement program at ACEEE Summer Study. They have had good success putting 120 volt HPWHs on trucks and in warehouses for emergency replacements.

Commented [RIE155R4]: OK thanks that is good to know. We can keep it on the list/radar.

Commented [RF156]: Doesn’t this conflict with the RNC HERS rater role?

Commented [RIE156R2]: Please see text edits

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A rebate processing vendor verifies and processes post-consumer incentives which can be submitted electronically or by traditional mail. This vendor also processes upstream and midstream incentives. Customers who complete a Home Energy Assessment through the EnergyWise Program can apply for financing through the for 0 percent HEAT Loan ~~financing~~ for qualified high-efficiency space heating and hot water equipment upgrades.

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5.4 2025 Program Enhancements, Changes, and Notable Items

The Company plans to focus on the following key themes and items in 2025 for the HVAC and Hot Water program.

Starting in 2025, the Company intends to offer tiered incentives to encourage the purchase of the highest efficiency heat pumps. We will increase our baseline heat pump standard to ENERGY STAR Cold Climate 6.1. We will also offer an enhanced incentive for heat pumps that meet Consortium for Energy Efficiency (CEE) requirements, which is the current requirement for the federal tax credit.

The Company will continue to coordinate with the RI Department of Energy Resources (OER) and their Clean Heat Rhode Island (CHRI) program¹³, on topics such as:

- Alignment on heat pump standards.
- Information for customers, to ensure messaging is consistent and to help avoid customer confusion.

The Company also intends to expand contractor training and provide additional sales resources for contractors to share the benefits of heat pumps with their customers, and to ensure customer clarity and awareness regarding available incentives.

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Commented [GR157]: If gas space and water heat ... [202]

Commented [RIE157R2]: The cost to implement ... [204]

Commented [G157R3]: There is little evidence of ... [201]

Commented [RIE157R4]: How do the incentives ... [203]

Commented [CJ158]: Where does gas equipment ... [205]

Commented [RIE158R2]: We are starting with th ... [208]

Commented [CJ158R3]: I think its less about ma ... [207]

Commented [RIE158R4]: CFL to LED is not apple ... [206]

Commented [GR159]: Consider also offering a ti ... [209]

Commented [RIE159R2]: Thanks for the suggestion.

Commented [G159R3]: But not considered. Why not?

Commented [RIE159R4]: We will consider but n ... [210]

Commented [SC160]: Supportive of this, assumi ... [211]

Commented [RIE160R2]: The plan is to increase ... [212]

Commented [GR161]: ENERGY STAR

Commented [RF162]: This is good, but can you d ... [214]

Commented [RIE162R2]: RIE will take this into ... [213]

Commented [GR163]: Good

Commented [GR164]: Provide a link

Commented [RIE164R2]: Done

Commented [GR165]: Both space and water heating

Commented [RIE165R2]: Heat pump standards ... [215]

Commented [GR166]: Are participating contract ... [216]

Commented [RIE166R2]: No, the contractor lists ... [218]

Commented [G166R3]: Should we be working to ... [220]

Commented [RF166R4]: This might be a good ... [219]

Commented [RIE166R5]: Glenn; I'm not sure RIE ... [217]

Commented [RF167]: Good!

Commented [RF168]: Look at the services Abode ... [222]

Commented [RIE168R2]: RIE works with with Cl ... [221]

Commented [RF168R3]: Great.

Commented [ML169]: If not already included, su ... [223]

Commented [RIE169R2]: Weatherization is requ ... [224]

Commented [GR170]: Please provide HPWH con ... [226]

Commented [RIE170R2]: Good suggestion - RIE ... [225]

¹³ <https://cleanheatri.com/>

6. Residential Consumer Products (Electric)

6.1 Offerings

The Residential Consumer Products (RCP) Program incorporates the Environmental Protection Agency (EPA) ENERGY STAR categories of consumer appliances, select building products, and some energy-saving items not included by the EPA. The largest savings elements of the Consumer Products Program come from recycling older refrigerators, dehumidifiers, and freezers.

Residential Consumer Products supports the following products:

~~Energy Star~~ENERGY STAR Certified:

- Clothes dryers
- Dehumidifiers
- Room air cleaners
- Room air conditioners

~~Energy Star~~ENERGY STAR Most Efficient:

- Room air conditioners
- Clothes dryers
- Clothes washers
- Dehumidifiers
- Refrigerators

Additional Products:

- Advanced power strips
- Water saving equipment
- Variable speed pool pumps

Consumers can purchase products at a local retailer, online at the [RI Energy Marketplace](#), or through any online retailer (if the product meets product specifications, and there is a receipt). The RI Energy Marketplace is a streamlined portal through which customers can buy efficient products with the rebate already applied, eliminating the need for the customer to apply for the rebate post-sale. Most products on the Marketplace are ones that can be installed by the customer. In some instances, products on the Marketplace are not incentivized. However, the Company lists these products on the Marketplace to provide pre-vetted products to narrow down the selection for consumers and help them avoid potentially unreliable or untested products available through other online retailers.

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Commented [RF171]: Are we back on track with recycling after loosing the previous vendor? Will the new one be around for a while?

Commented [RIE171R2]: RFP schedule is on track

Commented [RF171R3]: What is the timing for having a new vendor under contract?

Commented [RIE171R4]: Recycling services should be back up and running in Q4 2024.

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Commented [RF172]: How about ENERGY STAR cooktops/ranges? What about the saddle window heat pumps?

Commented [RIE172R2]: Induction cooktops off ... [227]

Commented [RF173]: Can we do a market saturation ... [232]

Commented [CJ173R2]: See Glenn comment below ... [231]

Commented [RIE173R3]: Last year we reviewed ... [230]

Commented [G173R4]: Please review ENERGY STAR ... [228]

Commented [RIE173R5]: We discussed the RCP ... [233]

Commented [ML174]: Please provide rebate levels ... [229]

Commented [RIE174R2]: Efficiency levels can be ... [235]

Commented [RF174R3]: Rebate levels?

Commented [RIE174R4]: Measure incentives are ... [234]

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Commented [GR175]: ENERGY STAR

Commented [RIE175R2]: Updated

Commented [GR176]: Given 2022 ENERGY STAR ... [237]

Commented [RIE176R2]: Please see shelf stock ... [236]

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Commented [GR177]: ENERGY STAR

Commented [RIE177R2]: Updated.

Commented [GR178]: Consider adding freezers ... [239]

Commented [RIE178R2]: Air Cleaners are available ... [238]

Commented [GR179]: There are now ENERGY STAR ... [240]

Commented [RIE179R2]: RIE offers Energy Star ... [241]

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Commented [ML180]: Other than the Marketplace ... [243]

Commented [RIE180R2]: Customer can either a ... [242]

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6.2 Eligibility Criteria

The Residential Consumer Products Program serves all residential customers.

6.3 Implementation and Delivery

There is a Lead Vendor that works with retailers, so that they are knowledgeable about the products and ensure proper signage within the retail stores. The Lead Vendor also helps staff customer outreach events and customer information tables at retailer locations. The program supports a combination of upstream and midstream incentives as well as post-purchase consumer incentives.

The upstream incentive is negotiated with major retailers, manufacturers, and distributors while the midstream incentives are typically offered to distributors who are working with smaller retailers. The incentives encourage retailers, manufacturers, and distributors to support ENERGY STAR products by increasing the on-site stocking levels of highly efficient products. By increasing the availability of the products, providing information on the advantages of ENERGY STAR products, and the offer (or promise) of an incentive, the consumer is more likely to acquire products that they might not normally have purchased.

A rebate processing vendor verifies and processes post-consumer incentives which can be submitted electronically or by traditional mail. This vendor also processes upstream, midstream, and recycling incentives.

The recycling vendor collects refrigerators, freezers and dehumidifiers from customer residences or central recycling locations and transports them to the recycling facility in compliance with the EPA's Responsible Appliance Disposal Program.

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6.4 2025 Program Enhancements, Changes, and Notable Items

In 2025, the Company will:

- Offer appliance recycling to customers for pick-up services to recycle working refrigerators and freezers with add-on dehumidifiers.
- Continue to explore ways to increase program awareness around instant rebates on Most Efficient Appliances; refrigerators, clothes washers & dryers, room air conditioners.
- Continue monitoring evaluation, monitoring, and verification (EM&V) and market data (e.g., on free-ridership, net-to-gross) to ensure optimization of the program's measures and incentives.

The Company is also screening to see if heat pump dryers could be added as a cost-effective measure.

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Commented [RF181]: Remove transformed products and add new ones, per comments above?

Commented [RIE181R2]: See responses to other comments. It might be best to discuss these items on a Sector call.

Commented [CJ182]: Are there other appliance recycling services we could be offering (e.g. room ACs)?

Commented [RIE182R2]: Room ACs do not screen.

Commented [ML182R3]: Stand alone dehumidifiers

Commented [RIE182R4]: We can investigate stand alone dehumidifier screening.

Commented [SC183]: Looking forward to this programming resuming as soon as possible, proper recycling is critically important and if I recall correctly, this is a very cost-effective program

Commented [RIE183R2]: Thanks Steve, we are also looking forward to the program resuming and we are working hard to make that happen ASAP.

Commented [CJ183R3]: Do Room AC's only not screen on their own? What if they were included in a package deal with other appliances? Just something to look into.

Commented [RIE183R4]: Yes, they do not screen on their own. We will look into package deals, thank you for the suggestion.

Commented [CJ183R5]: Leaving open for now until we hear more on this.

Commented [RIE183R6]: We are looking into it. If we find it works it can be added mid-course.

Commented [CJ184]: Could we explore adding some sort of enhanced incentive to a customer that recycles a ... [245]

Commented [RIE184R2]: This would only be app ... [244]

Commented [SC185]: Just flagging that I would ... [247]

Commented [RIE185R2]: One example re: incre ... [246]

Commented [SA186]: Can we spell out NTG?

Commented [RIE186R2]: Done

Commented [SA187]: Let's spell acronyms before ... [248]

Commented [RIE187R2]: Done

Commented [GR188]: Yes, good. To the comm ... [249]

Commented [RIE188R2]: Most Efficient applian ... [251]

Commented [G188R3]: Yes, but, for example, th ... [250]

Commented [RIE188R4]: See response above.

7. Residential New Construction (Electric and Gas)

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.

7.1 Offerings

Design and Construction Assistance

- Energy modeling and design assistance to verify compliance with the Residential New Construction (RNC) Program's requirements and determination of respective incentives.
- In-field training and inspections to verify compliance with the RNC Program requirements and promote efficiency in subsequent projects.

Market Development

- Technical training on high-efficiency and Zero Energy building practices, all electric new-homes, as well as energy code compliance, to build necessary market capacities. Please refer to the Main Text Section 2.6.2.5 Training for Codes and Standards for more discussion on energy code.
- Training and certifying Home Energy Rating System (HERS) raters to increase the number of qualified raters based in RI.
- Rating and certification services, including HERS, DOE Zero Energy Ready Home, Passive House, and ENERGY STAR, to promote visibility of energy efficiency in the marketplace and support increased use of the Rhode Island Residential Stretch Code.

Incentives

- Whole-home efficiency incentives for buildings based on achieved level of efficiency and number of units.
 - Path to Energy Efficiency incentives ranging from \$200 to \$4,000 per home.
 - Three efficiency tiers, with an entry threshold of 15 percent more efficient than baseline and progressive maximum air leakage requirements.
 - Additional incentive options of \$250-\$1,000 per home for all-electric homes and \$100-\$200 per home for achieving ENERGY STAR certification.
- Path to Zero Energy Ready incentives ranging from \$500-\$1,500 per home in addition to Path to Energy Efficiency.
 - Projects must meet a minimum base efficiency level, be all-electric, and achieve DOE Zero Energy Ready Home, Passive House, or equivalent certification.

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Commented [GR189]: As noted in the Main text, IECC 2024 is expected to be adopted in RI in 2024 following its release in mid-2024. There does not appear to be any consideration of that below relative to program requirements, training, etc.

And will the RI Stretch code also be updated?

Commented [RIE189R2]: Please refer to Main section - 2.6.2.5 Training for Codes and Standards

OER sets the stretch code for RI & timeline, RIE partners with them. Its primarily based on DOE zero energy ready with RI inputs

Commented [ML190]: it would be nice to see some intro/transitional language here like in the other major sections

Commented [RIE190R2]: Updated

Commented [ML190R3]: Great

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Commented [RF191]: Where are we with training on all-electric new homes? That needs to be part of the primary focus going forward.

Commented [RIE191R2]: All electric homes are ... [252]

Commented [RF192]: Has there been a recent st ... [254]

Commented [RIE192R2]: No - we are planning t ... [255]

Commented [RF192R3]: Nick Jones at Eversourc ... [253]

Commented [RIE192R4]: Thank you for letting u ... [256]

Commented [RF193]: Are you collaborating with ... [258]

Commented [RIE193R2]: Good suggestions. Ou ... [257]

Formatted ... [259]

Commented [G194]: Will these savings % need t ... [261]

Commented [RIE194R2]: Potentially. We will be ... [260]

Commented [RF195]: Is this really enough to tra ... [262]

Commented [RIE195R2]: We do commit below ... [263]

Commented [ML196]: This doesn't seem adequ ... [264]

Commented [RIE196R2]: There is no certificatio ... [265]

Commented [GR197]: The first tier of the Path t ... [268]

Commented [RIE197R2]: RIE will look to align w ... [267]

Commented [G197R3]: But while DOE ZERH is in ... [266]

Commented [RIE197R4]: Thanks.

- Projects with more than 75 units are eligible for custom incentives.
- Adaptive Reuse projects are incentivized based on a separate set of prescriptive measures tailored to mill conversion projects.
- Certification incentives are provided to support third-party verification of energy efficiency measures.
- Equipment rebates for qualifying high-efficiency heating, cooling, and hot water equipment.
- Complimentary WaterSense showerheads.

7.2 Eligibility Criteria

The RNC Program is designed to advance the Rhode Island housing market toward Zero Energy Homes. The program provides technical services, inspection services, and project incentives for new construction, additions, and major renovations to both one-to-four unit and five plus unit buildings. The program also supports major renovation of adaptive reuse projects (e.g., mill building conversions). The RNC Program supports both market rate and income eligible housing units.

7.3 Implementation and Delivery

Design and Construction Assistance, Incentives

The RNC project pipeline is developed primarily through coordination with Rhode Island permitting departments, engagement of the building industry, and referrals from EnergyWise and Rhode Island Housing. A participating customer/project team officially begins the enrollment process by calling or emailing the RNC Program. The project team meets with the RNC Program team (led by a Lead Vendor) to discuss the project design, learn how to modify design or mechanical systems to improve energy efficiency, and initiate energy modeling of the project to determine the potential for incentives. Once construction has begun, RNC staff provides on-site training as needed and conducts inspections of the completed project to determine energy efficiency and respective incentives. When the project is complete and has met program requirements, the performance and equipment incentives are issued.

Market Development

The RNC Program identifies opportunities to build necessary market capacities to advance toward Zero Energy Homes and delivers education and outreach programming designed to achieve this goal.

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Commented [RF198]: Shouldn't these be folded into the whole home performance incentives?

Commented [RIE198R2]: Whole home incentives are for overall performance of the home. Certain rebates are included separately for higher-efficient equipment in order to focus on equipment as part of the overall performance of the home.

Commented [RF199]: Should there be different incentives for IE projects?

Commented [RIE199R2]: Good question. Not sure. Do you have any analysis to support what the impact of different incentives might be?

Commented [RF199R3]: While I have not seen different incentives for IE RNC projects, there are many RNC programs that provide additional technical assistance and support to affordable projects that are looking to earn QAP (qualified allocation plans) credits for low-income housing tax credits. The CT RNC program has been very successful at driving affordable housing projects to the RNC program. [269]

Commented [RIE199R4]: OK, thank you. We will [270]

Commented [GR200]: Speak more to PH, particu [272]

Commented [RIE200R2]: RIE is increasing incent [273]

Commented [RF200R3]: How about regular train [271]

Commented [RIE200R4]: We offer PH expertise [274]

Commented [RF201]: Shouldn't the process begi [278]

Commented [RIE201R2]: This is how it currentl [275]

Commented [G201R3]: Speak to that, please.

Commented [RF201R4]: Agreed. It would be go [276]

Commented [RIE201R5]: We can expand on this [277]

Commented [RF202]: Good.

Commented [GR203]: The RNC discussion needs [287]

Commented [CJ203R2]: Not only a missed oppo [283]

Commented [RIE203R3]: We offer comprehens [288]

Commented [CJ203R4]: Can the Plan speak to th [279]

Commented [RF203R5]: Passive House is not ne [281]

Commented [RIE203R6]: To be clear, every RNC [280]

Commented [ML204]: Please provide examples [282]

Commented [RIE204R2]: Please see 7.4 regardin [284]

Commented [RF204R3]: Please add all-electric t [286]

Commented [RIE204R4]: Every RNC electric proj [285]

7.4 2025 Program Enhancements, Changes, and Notable Items

In 2025, the Company will focus on the following themes and items for the Residential New Construction program.

- Conduct exit surveys with builders after the completion of each project.
- Expand partnerships with affordable housing entities such as RI Housing to develop high efficiency construction guidelines and standards for affordable housing.
- Monitor and prepare for new code changes (IECC 2024). Adjust program incentives to account for an increasingly more stringent code baseline, and continue to encourage high efficiency construction, with a goal of setting net zero energy as the construction standard in Rhode Island.
- Increase incentives for achieving Passive House certification.
- Increase incentives for achieving US DOE Zero Net Energy certification.
- Increase incentive bonus for all electric homes.
- Increase the number of projects achieving advanced building standards and certifications including Zero Net Energy and Passive House.
- Continue with training and workforce development efforts. Please refer to Section 2.6.2.5 (Training for Codes and Standards) in the Main Text for more information on this topic.
- Work with CT and MA to leverage their trainings.
- Raise awareness of additional programs such as solar PV, electric vehicle charging, and battery programs through trainings and program materials.

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Commented [GR205]: All program homes should be electrification, EV and PV ready, regardless of the fuel type.

Note also that there is a new MF DOE ZERH set of requirements. How is RIE preparing the market for this?

Finally, RIE needs to explore and engage the manufactured home industry to assess their role in the program, particularly for affordable housing

Commented [RIE205R2]: We will provide information on EVSE and PV in program materials. See 7.4.

... [291]

Commented [RF205R3]: Are you able to get

... [289]

Commented [RIE205R4]: Manufactured homes

... [290]

Commented [RF206]: How about integration with

... [293]

Commented [RIE206R2]: RIE will raise awareness

... [292]

Commented [CJ207]: Move to all electric NC program?

Commented [RIE207R2]: We are starting with t

... [296]

Commented [RF207R3]: Agree with Craig. It's t

... [301]

Commented [CJ207R4]: The Company's program

... [297]

Commented [RIE207R5]: Our work and training

... [295]

Commented [CJ208]: Commitment in 2024 Plan

... [300]

Commented [RIE208R2]: We did explore some

... [299]

Commented [CJ208R3]: Can you please elaborate

... [294]

Commented [RIE208R4]: The program performs

... [302]

Commented [RIE208R5]: Regarding program re

... [298]

Commented [SC209]: Nice!

Commented [RIE209R2]: Thanks!

Commented [G209R3]: But what about enhance

... [304]

Commented [RIE209R4]: Richard mentioned thi

... [303]

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Commented [GR210]: Zero Energy, or Net Zero

... [305]

Commented [RIE210R2]: It is technically Net Zero Energy

Commented [GR211]: But HERS 55 for SF homes

... [308]

Commented [RIE211R2]: Compared to the curre

... [306]

Commented [G211R3]: But this should not be th

... [307]

Commented [RIE211R4]: We would disagree tha

... [309]

Commented [RF212]: Good

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8. Home Energy Reports (Electric and Gas)

8.1 Offerings

The HER Program is a statewide energy efficiency offering that provides benefits for Rhode Island residential customers through the mailing and emailing of customer-specific energy usage reports and insights. While over 300,000 customers receive HERs (i.e., the treatment group) by way of direct mail and/or e-mail, all account holders have access to insights into their energy consumption via the web tools located on the Company's website. The program has evolved since 2013 from offering only mailed insights to now being integrated into the Company's website with online assessment tools, sending Non-Advanced Metering Infrastructure (AMI) High Usage Alerts, and utilizing segmentation to target different populations with relevant messaging.

8.2 Eligibility Criteria

Most Rhode Island residential Electric and Gas customers are eligible for the HER Program. Customers with an email address on record will also receive an electronic version of the report (eHER). All customers have access to the online home energy assessment and related insights. Randomly compiled control and treatment groups are necessary for accurate savings reporting. Thus, some customers will not receive print or electronic reports (control group), while others receive both print and electronic HERs (treatment group).

8.3 Implementation and Delivery

The HER Program is administered by a Lead Vendor, a company with subject matter expertise selected by the Company to deliver the program. The Lead Vendor is responsible for maintaining HER distribution groups, tracking data, managing the online portal, and documenting energy savings. The Lead Vendor works with the Company to craft the messaging and delivery of the HERs and works with the Company to introduce additional program enhancements, aligning with the Company's state-wide comprehensive marketing efforts.

All eligible customers will receive up to six printed versions of the report a year and up to four gas specific reports in the winter season. All customers with email on record will receive up to 12 eHERs a year. The reports include marketing messages informing customers of other program opportunities so that they may be made aware of the most current and relevant energy efficiency offerings. For customers interested in learning more about energy saving tips and their home's energy consumption, they may log into the online portal and use the available tools.

Commented [RF213]: Is it still cost-effective? When looking at long-term savings, would budgets for this be better spent on longer-lasting programs and measures than the short-term savings we see with this program?

Commented [RIE213R2]: The program screens well. Behavior is an important component. It's good to provide a mix of solutions to attack problems from multiple angles. HER is designed to reach customers that are beginning their EE journey. They receive a sense of how their energy usage compares to similar households. It is also the one program that serves the majority of residential customers and since everyone contributes to the SBC, it allows all customers to participate when they are not yet ready to make larger investments.

Commented [CJ214]: Has the Company started thinking about how it might start utilizing AMI data once advanced meters are installed? Assuming the program continues into the future, there are other opportunities that AMI could likely unlock for these programs.

Commented [RIE214R2]: The Company is considering how to support AMI data to make it meaningful and actionable for customers. The key is to ensure that messaging conveys actions that are both easy and impactful. Manual steps that HER has taken with flagging solar customers will be easier to identify as well as EV and other segments.

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8.4 2025 Program Enhancements, Changes, and Notable Items

For 2025, the planned savings are based on recent actuals (as opposed to estimated savings from the most recent EM&V study).

9. Marketing to Residential Customers

In 2025, 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, and product rebate programs. 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 energy efficiency programs.

Rhode Island Energy’s website will be overhauled in 2024, which will improve navigability, readability, and accessibility. Customers will have a single sign-on experience that allows them to seamlessly access information on all aspects of their energy use, including billing questions and energy efficiency. The website will offer language translation through Google Translate to improve accessibility for all customers. The improved website will be available by early 2025.

The Company plans to hold twelve Customer Assistance Expos annually, plus over a dozen pop-ups each month, located in communities throughout the state. These events focus on ways to help customers pay their bills. Energy efficiency is a key method to help customers lower their gas and electric bills, and Company staff help customers understand how to participate. These events serve as excellent opportunities to engage with customers, offering informative materials, raising awareness, and addressing the relevance of energy efficiency. Customer Advocates will attend many outreach events at local organizations in addition to the Customer Assistance Expos.

Multichannel marketing enables customers to learn about energy efficiency through a variety of communication methods including print ads, radio ads, social media, online/digital, e-mail, direct mail, bill inserts, events, collateral, and Google paid search.

The Company plans to pilot a social media influencer effort in 2024 and based on those learnings will expand in 2025. Social media influencers can develop content covering topics from energy saving tips, the Home Energy Assessment experience, how heat pumps work, or making a product purchase at Lowe’s or Home Depot and getting an instant rebate. Through authentic content from personalities that customers already trust, Rhode Islanders can organically learn about making more energy efficient choices and finding ways to save money.

The Company coordinates State agencies to refer customers and share leads across Rhode Island Energy Efficiency Programs and other state and federal energy efficiency opportunities, such as CHRI. Cross-marketing occurs via strategically timed collateral, leave-behind information and marketing materials that cross-promote programs, and by processes to serve customers and buildings holistically across

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Commented [RF215]: Where is the DEI focus here and in each of the programs above? What is RIE doing to prioritize DEI focus and efforts?

Commented [RIE215R2]: Please see Equity section in main text of plan.

Commented [RF215R3]: It’s good to have that section, but it doesn’t feel integrated into the programs when it’s never mentioned again. Equity only works if it’s part of all the program efforts and not just a discussion on the side. How can we know equity is truly integrated into each program?

Commented [RIE215R4]: Richard, the point of the equity section is so that we don’t have an equity subsection in every program. Please refer to EWG activities and meetings if you want more detail.

In addition to everything listed, a few of the recent steps we have taken to ensure equity in outreach work includes adding Spanish language scheduling options at RISE for home energy audits, creating flyers in Spanish for weatherization audit information, using these flyers in two languages to stuff 15k backpacks at the Back to School celebrations across the state - all in Justice 40 areas. This information is being shared by the new EE Customer Advocate with non-profit organizations in areas that identified as underserved/LMI/Spanish speaking. Landlord listening sessions are slated for late September in Central Falls.

Commented [RF216]: Can this include an equity lens? Do we have a good handle on who participates in programs and who doesn’t? Are non-participants the people who could benefit the most from our programs and should they be the ones prioritized with our targeting? Have we conducted a participation study to understand who participates, who doesn’t, and how best to target them?

Commented [RIE216R2]: There are a number of equity initiatives that receive targeted marketing, outreach and resources. There was a participant / non-participant study done recently. I believe marketing in general is by definition designed to target non-participants to become participants.

Equity work by definition is centered on outreach and work with “targeted customer segments”

If you listen to the PUC hearings, they have different opinions on what equity means and in particular concerns about SBC funds not being broadly marketed to all customers. So it can be a balancing act.

... [310]

Commented [RF217]: Great.

multiple program pathways. In 2025, the Company will introduce a follow-up marketing campaign triggering communications to customers after they participate, identifying the next best step in their energy efficiency journey. The Company holds routine meetings and has ad hoc channels of communication open with other program administrators, including OER and CommerceRI.

Equity continues to be a key component of the Company's Marketing strategy. E-mails include prominent links at the top of each communication, enabling customers to read the message in Spanish or Portuguese. Direct mail may include all three languages (English, Spanish, and Portuguese) or QR codes to read the text in Spanish or Portuguese, based on the customer's preference.

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Commented [RF218]: Great. Thanks for adding this. Is language enough to make sure we are reaching everyone who needs to participate?

Commented [RIE218R2]: Please see comments above and all the initiatives we have discussed in the text and in the comments.

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10. Residential Measures and Incentives

Table 3 below lists the planned measures for the electric Residential programs, by program, along with the planned quantities, incentives per quantity, total incentives, and annual and lifetime savings. **Error! Reference source not found.** Table 4 shows planned costs in non-incentive cost categories for each program that are not allocated at the measure level.

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Table 5, Table 4 and **Error! Reference source not found.** Table 6 show the same information for the planned Gas program, respectively. Planned costs in non-incentive cost categories for each program that are not allocated at the measure level are provided in Table E-2 of Attachment 5 for the electric portfolio and Table G-2 of Attachment 6 for the natural gas portfolio.

Table 23. Planned Measures for Electric Residential Programs

Program	Measure	Quantity	Incentive / Quantity	Total Incentives	Net Annual Energy Savings (MWh)	Net Lifetime Energy Savings (MWh)	Net Annual Summer Capacity Savings (kW)	Net Annual Winter Capacity Savings (kW)	Annual Carbon Reductions (Short Tons)	Lifetime Carbon Reductions (Short Tons)
Residential New Construction	Clothes Washer	110	\$0.00	\$0.00	2.1	29.9	1.4	1.5	1.2	17.3
Residential New Construction	Codes and Standards	1	\$0.00	\$0.00	248.4	4,967.9	0.0	0.0	100.8	2,017.0
Residential New Construction	Cooling - Tier 1	105	\$0.00	\$0.00	10.1	251.8	1.4	0.0	5.5	136.3
Residential New Construction	Cooling - Tier 2	72	\$0.00	\$0.00	7.5	186.7	1.0	0.0	4.0	101.1
Residential New Construction	Cooling - Tier 3	9	\$0.00	\$0.00	1.1	28.7	0.3	0.0	0.6	15.5
Residential New Construction	CP - Cooling	11	\$0.00	\$0.00	1.6	41.0	1.3	0.0	0.7	16.6
Residential New Construction	CP - DHW	11	\$0.00	\$0.00	4.1	62.0	0.0	0.0	1.7	25.2
Residential New Construction	CP - Heating	11	\$843.00	\$9,273.00	14.5	361.9	0.0	7.6	12.9	322.7
Residential New Construction	DHW - Tier 1	105	\$0.00	\$0.00	3.4	50.4	0.8	0.0	1.8	27.3
Residential New Construction	DHW - Tier 2	72	\$0.00	\$0.00	2.4	35.3	1.6	0.0	1.3	19.1

Commented [RIE219]: This table is from 2024 Plan and is here as an example. It will be updated in future drafts.

Commented [ML219R2]: I made a couple of comments above about including the planned incentives. An alternative to providing this table here at the end might be to include relevant incentives in each program section.

Commented [RIE219R3]: Thanks Margie, that is an interesting idea and we will consider it for the next draft.

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d/b/a/ Rhode Island Energy
Docket No. AA-BB-CC
2025 Annual Plan Attachment 1*

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Residential New Construction	DHW - Tier 3	9	\$0.00	\$0.00	0.3	4.7	0.2	0.0	0.2	2.6
Residential New Construction	Dishwasher	320	\$0.00	\$0.00	1.1	12.4	0.1	0.1	5.1	55.7
Residential New Construction	Heating - Tier 1	105	\$1,547.00	\$162,435.00	53.7	1,342.9	0.0	4.9	48.7	1,217.6
Residential New Construction	Heating - Tier 2	72	\$5,203.00	\$374,616.00	81.6	2,040.4	0.0	7.6	74.8	1,870.5
Residential New Construction	Heating - Tier 3	9	\$8,233.00	\$74,097.00	15.0	375.8	0.0	2.6	14.6	364.0
Residential New Construction	Refrigerators	430	\$0.00	\$0.00	18.9	227.2	3.0	3.4	16.7	200.5
Residential New Construction	Renovation Rehab - Cooling Tier 1, Elec	30	\$0.00	\$0.00	11.5	288.6	1.2	4.5	55.4	1,386.0
Residential New Construction	Renovation Rehab - Cooling Tier 2, Elec	21	\$0.00	\$0.00	32.8	820.9	0.6	2.4	24.6	614.7
Residential New Construction	Renovation Rehab - Cooling Tier 3, Elec	2	\$0.00	\$0.00	4.2	104.7	0.3	1.2	1.8	46.2
Residential New Construction	Renovation Rehab CP - Cooling, Elec	3	\$0.00	\$0.00	2.1	52.7	0.0	0.1	0.9	23.2
Residential New Construction	Renovation Rehab CP - DHW, Elec	3	\$0.00	\$0.00	2.1	52.7	0.0	0.1	0.9	23.2
Residential New Construction	Renovation Rehab CP - Heating, Elec	3	\$843.00	\$2,529.00	2.1	52.7	0.0	0.1	0.9	23.2
Residential New Construction	Renovation Rehab - DHW Tier 1, Elec	30	\$0.00	\$0.00	11.5	173.1	1.2	4.5	55.5	831.8
Residential New Construction	Renovation Rehab - DHW Tier 2, Elec	21	\$0.00	\$0.00	32.8	492.5	0.6	2.4	24.6	368.8
Residential New Construction	Renovation Rehab - DHW Tier 3, Elec	2	\$0.00	\$0.00	4.2	62.8	0.3	1.2	1.8	27.7
Residential New Construction	Renovation Rehab - Heating Tier 1, Elec	30	\$2,006.00	\$60,180.00	11.5	288.6	1.2	4.5	55.6	1,390.7
Residential New Construction	Renovation Rehab - Heating Tier 2, Elec	21	\$2,953.00	\$62,013.00	32.8	820.8	0.6	2.4	24.6	615.6
Residential New Construction	Renovation Rehab - Heating Tier 3, Elec	2	\$15,104.00	\$30,208.00	4.2	104.7	0.3	1.2	1.8	46.2
Residential New Construction	Showerheads	11	\$0.00	\$0.00	2.6	39.7	0.4	0.6	1.1	16.1

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Residential HVAC	Central Heat Pump	303	\$350.00	\$106,050.00	406.5	8,129.8	58.4	7.7	188.6	3,772.2
Residential HVAC	CoolSmart AC QIV ES	61	\$175.00	\$10,675.00	2.2	38.9	1.3	0.0	1.0	18.0
Residential HVAC	CoolSmart HP Tuneup	230	\$200.00	\$46,000.00	69.2	346.0	21.0	50.2	31.9	159.6
Residential HVAC	CoolSmart HP QIV ES	15	\$175.00	\$2,625.00	3.5	63.1	0.3	0.8	1.6	29.1
Residential HVAC	ECM Pumps	4,533	\$100.00	\$453,300.00	340.9	5,113.2	0.0	135.0	138.4	2,076.0
Residential HVAC	Electric Resistance to MSHP	641	\$4,000.00	\$2,564,000.00	3,799.1	64,584.8	0.0	1,149.2	1,704.4	28,974.0
Residential HVAC	HPWH, Electric - <55 gallon	26	\$625.00	\$16,250.00	41.5	539.3	1.6	2.6	16.7	217.6
Residential HVAC	HPWH, Electric - >55 gallon, UEF 2.70	254	\$150.00	\$38,100.00	85.2	1,107.9	1.8	3.0	37.1	482.6
Residential HVAC	Mini Split Heat Pump QIV	526	\$120.00	\$63,120.00	43.3	735.9	3.5	9.5	17.6	298.8
Residential HVAC	MiniSplit HP	1,975	\$375.00	\$740,625.00	1,009.6	17,162.7	78.4	180.0	468.4	7,963.5
Residential HVAC	WiFi programmable thermostat with cooling (oil)	1,650	\$75.00	\$123,750.00	29.4	323.4	17.2	0.0	387.2	4,259.7
Residential HVAC	WiFi Thermostat, AC Only	800	\$75.00	\$60,000.00	51.0	561.1	13.9	0.0	20.9	230.1
Residential HVAC	Window - Electric Resistance	25	\$75.00	\$1,875.00	3.1	53.4	1.0	1.3	1.3	22.6
Residential HVAC	Window -Heat Pump	25	\$75.00	\$1,875.00	1.7	28.2	0.4	0.3	0.7	11.9
Residential HVAC	Window -Oil	25	\$75.00	\$1,875.00	0.2	2.9	0.1	0.0	1.3	22.0
Residential HVAC	Window - Propane	25	\$75.00	\$1,875.00	0.2	2.9	0.1	0.0	1.1	18.5
Residential HVAC	ACDOWNSIZE	50	\$150.00	\$7,500.00	8.6	155.3	4.4	0.0	4.1	74.2
EnergyWise Single Family	Aerator, Electric	246	\$7.00	\$1,722.00	4.6	32.3	0.4	0.7	2.4	16.8
EnergyWise Single Family	Aerator, Oil	231	\$7.00	\$1,617.00	0.0	0.0	0.0	0.0	2.4	17.0
EnergyWise Single Family	Aerator, Others	33	\$7.00	\$231.00	0.0	0.0	0.0	0.0	0.3	1.9
EnergyWise Single Family	Electric Resistance to MSHP	20	\$4,400.00	\$88,000.00	123.8	2,104.2	0.0	37.4	53.2	904.0
EnergyWise Single Family	Participant	5,070	\$375.00	\$1,901,250.00	0.0	0.0	0.0	0.0	0.0	0.0
EnergyWise Single Family	Pipe Insulation, Electric	1,584	\$7.00	\$11,088.00	55.7	389.9	4.4	8.6	29.0	202.9

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EnergyWise Single Family	Pipe Insulation, Oil	2,420	\$7.00	\$16,940.00	0.0	0.0	0.0	0.0	58.0	405.9
EnergyWise Single Family	Pipe Insulation, Others	660	\$7.00	\$4,620.00	0.0	0.0	0.0	0.0	13.2	92.4
EnergyWise Single Family	Pre- weatherization	715	\$250.00	\$178,750.00	0.0	0.0	0.0	0.0	0.0	0.0
EnergyWise Single Family	Programmable Thermostat - Elec	846	\$100.00	\$84,600.00	96.1	1,826.2	79.6	18.3	67.3	1,278.4
EnergyWise Single Family	Programmable Thermostat, Oil	2,780	\$100.00	\$278,000.00	38.3	727.9	63.4	0.0	439.5	8,351.2
EnergyWise Single Family	Programmable Thermostat, Others	74	\$100.00	\$7,400.00	1.0	19.4	1.7	0.0	9.9	187.7
EnergyWise Single Family	Refrigerator Brush	4,221	\$5.00	\$21,105.00	47.8	239.2	8.1	6.2	18.7	93.4
EnergyWise Single Family	Showerhead - Elec	1,140	\$30.00	\$34,200.00	161.0	2,414.8	13.5	0.0	83.8	1,257.0
EnergyWise Single Family	Showerhead - Oil	1,300	\$30.00	\$39,000.00	0.0	0.0	0.0	0.0	108.1	1,621.0
EnergyWise Single Family	Showerhead - Other	66	\$30.00	\$1,980.00	0.0	0.0	0.0	0.0	4.2	62.9
EnergyWise Single Family	Smart Strip	7,598	\$22.00	\$167,156.00	456.2	2,281.2	46.0	63.2	250.3	1,251.6
EnergyWise Single Family	Weatherization, Electric	330	\$4,000.00	\$1,320,000.00	229.7	4,594.6	209.0	47.9	102.5	2,049.9
EnergyWise Single Family	Weatherization, Oil	1,498	\$2,650.00	\$3,969,700.00	87.2	1,744.9	108.2	0.0	1,552.8	31,056.1
EnergyWise Single Family	Weatherization, Others	200	\$2,300.00	\$460,000.00	11.6	233.0	14.4	0.0	173.8	3,476.7
EnergyWise Single Family	WiFi Thermostat - AC Only	15	\$200.00	\$3,000.00	0.4	4.3	0.6	0.0	0.3	3.0
EnergyWise Single Family	WiFi Thermostat - Oil	66	\$200.00	\$13,200.00	0.9	10.0	1.5	0.0	13.8	152.3
EnergyWise Single Family	WiFi Thermostat - Others	22	\$200.00	\$4,400.00	0.3	3.3	0.5	0.0	3.9	42.7
EnergyWise Multifamily	Aerator - Elec	300	\$5.00	\$1,500.00	9.5	66.8	0.8	1.5	4.2	29.2
EnergyWise Multifamily	Aerator - Oil	5	\$5.00	\$25.00	0.0	0.0	0.0	0.0	0.1	0.5
EnergyWise Multifamily	Air Sealing - Elec	26,000	\$1.05	\$27,300.00	17.7	353.6	1.5	1.0	10.6	211.1
EnergyWise Multifamily	Air Sealing - Elec w/AC	2,200	\$1.05	\$2,310.00	1.5	29.9	2.5	0.0	0.9	17.9
EnergyWise Multifamily	Air Sealing - Oil	31	\$100.00	\$3,100.00	0.0	0.0	0.0	0.0	2.5	50.5

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EnergyWise Multifamily	CUSTOM CIRCULATOR	8,250	\$1.62	\$13,365.00	7.1	106.7	0.0	0.0	2.9	43.3
EnergyWise Multifamily	Heat Pumps	96,000	\$3.40	\$326,400.00	96.0	1,920.0	-8.1	8.1	39.0	779.5
EnergyWise Multifamily	Insulation - Elec w/AC	27,708	\$1.80	\$49,874.40	16.2	406.0	9.0	0.0	9.7	242.4
EnergyWise Multifamily	Insulation - Oil	28	\$118.00	\$3,304.00	0.0	0.5	0.0	0.0	2.3	57.3
EnergyWise Multifamily	Pipe Wrap DHW - Elec	250	\$3.00	\$750.00	5.2	78.2	0.4	0.8	2.3	34.1
EnergyWise Multifamily	Pipe Wrap DHW - Oil	3	\$3.00	\$9.00	0.0	0.0	0.0	0.0	0.0	0.5
EnergyWise Multifamily	Programmable Thermostat - Elec w/ AC	500	\$125.00	\$62,500.00	70.0	1,329.7	20.2	10.1	53.6	1,018.6
EnergyWise Multifamily	Programmable Thermostat - Oil	2	\$125.00	\$250.00	0.0	0.6	0.0	0.0	0.3	5.1
EnergyWise Multifamily	Showerhead - Elec	200	\$25.00	\$5,000.00	41.2	617.7	3.3	6.3	18.0	269.7
EnergyWise Multifamily	Showerhead - Oil	1	\$25.00	\$25.00	0.0	0.0	0.0	0.0	0.1	1.5
EnergyWise Multifamily	Smart Strips	960	\$23.00	\$22,080.00	54.5	272.6	5.5	7.6	31.6	158.1
EnergyWise Multifamily	TSV Showerhead - Elec	30	\$40.00	\$1,200.00	7.9	118.6	0.6	1.2	3.5	51.8
EnergyWise Multifamily	TSV Showerhead - Oil	1	\$40.00	\$40.00	0.0	0.0	0.0	0.0	0.1	1.8
EnergyWise Multifamily	VFD	6,000	\$4.00	\$24,000.00	5.3	69.2	0.0	0.0	2.4	31.4
EnergyWise Multifamily	Common Int EISA Exempt	80	\$52.00	\$4,160.00	14.9	14.9	2.1	3.3	6.0	6.0
Home Energy Reports	Existing Dual Fuel	4,101,885	\$0.00	\$0.00	4,430.0	4,430.0	631.3	985.7	1,798.6	1,798.6
Home Energy Reports	Existing Electric	12,052,169	\$0.00	\$0.00	13,016.3	13,016.3	1,854.8	2,896.1	5,284.6	5,284.6
Home Energy Reports	New Movers Dual Fuel	2,465,740	\$0.00	\$0.00	1,652.0	1,652.0	235.4	367.6	670.7	670.7
Home Energy Reports	New Movers Electric	4,424,506	\$0.00	\$0.00	2,964.4	2,964.4	422.4	659.6	1,203.6	1,203.6
Residential Consumer Products	Advanced Power Strips - Tier 2	1,100	\$35.00	\$38,500.00	155.0	775.1	8.4	11.5	62.9	314.7
Residential Consumer Products	Clothes Washer Most Efficient	131	\$25.00	\$3,275.00	3.4	48.3	2.1	2.4	1.6	21.8
Residential Consumer Products	Dryer Most Efficient	131	\$30.00	\$3,930.00	27.6	441.5	3.4	4.6	11.2	179.3
Residential Consumer Products	Dehumidifier	1,800	\$30.00	\$54,000.00	71.9	1,221.7	16.0	4.0	59.5	1,012.2

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Residential Consumer Products	Dehumidifier Recycling	1,500	\$35.00	\$52,500.00	250.4	1,001.5	20.9	5.2	247.9	991.7
Residential Consumer Products	EnergyStar Dryer	725	\$50.00	\$36,250.00	59.7	955.5	7.4	10.0	46.6	746.0
Residential Consumer Products	Freezer Recycling	150	\$95.00	\$14,250.00	46.9	375.5	5.9	3.8	38.1	304.9
Residential Consumer Products	Low E Storm Windows, electric heat	30	\$25.00	\$750.00	6.6	131.9	5.7	1.3	2.8	55.8
Residential Consumer Products	Low E Storm Windows, other heat	30	\$25.00	\$750.00	0.1	2.9	0.1	0.0	1.9	38.4
Residential Consumer Products	Low Flow Showerhead w/ TSV - Elec	30	\$15.00	\$450.00	5.8	86.7	0.5	0.9	2.3	35.2
Residential Consumer Products	Low Flow Showerhead w/ TSV - Oil	30	\$15.00	\$450.00	0.0	0.0	0.0	0.0	2.5	37.8
Residential Consumer Products	Low Flow Showerhead w/ TSV - Other	30	\$15.00	\$450.00	0.0	0.0	0.0	0.0	1.9	29.1
Residential Consumer Products	Pool pump (variable)	375	\$500.00	\$187,500.00	428.5	2,571.2	369.5	0.0	195.5	1,172.9
Residential Consumer Products	Refrigerator Most Efficient	320	\$25.00	\$8,000.00	23.0	275.6	3.9	3.0	12.4	149.2
Residential Consumer Products	Refrigerator Recycling	2,300	\$95.00	\$218,500.00	936.0	3,744.1	158.4	121.3	826.1	3,304.5
Residential Consumer Products	Room AC (10.8)	450	\$40.00	\$18,000.00	9.1	108.9	17.1	0.0	6.6	78.9
Residential Consumer Products	Dehumidifier Most Efficient	25	\$17.00	\$425.00	1.2	19.8	0.3	0.1	0.5	8.0
Residential Consumer Products	Room AC Most Efficient	125	\$17.00	\$2,125.00	10.2	121.8	18.3	0.0	7.4	88.3
Residential Consumer Products	Room air cleaners	795	\$40.00	\$31,800.00	190.0	1,709.6	42.4	10.5	122.4	1,101.8
Residential Consumer Products	Smart Strips	6,500	\$10.00	\$65,000.00	508.6	2,543.0	51.3	70.5	206.5	1,032.5
Residential Consumer Products	Thermostatic Shutoff Valve - Elec	30	\$11.50	\$345.00	1.7	25.9	0.1	0.3	0.7	10.8
Residential Consumer Products	Thermostatic Shut-off Valve - Oil	35	\$11.50	\$402.50	0.0	0.0	0.0	0.0	1.0	14.4
Residential Consumer Products	Thermostatic Shut-off Valve - Other	25	\$11.50	\$287.50	0.0	0.0	0.0	0.0	0.5	7.6

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Residential Consumer Products	Tricklestar Keyboard	25	\$25.00	\$625.00	1.4	6.8	0.5	0.7	0.8	4.0
Income Eligible Single Family	Basic Educational Measures	2,060	\$180.00	\$370,800.00	43.3	216.3	4.4	6.0	17.6	87.8
Income Eligible Single Family	Dehumidifier Rebate	490	\$275.00	\$134,750.00	239.8	4,076.7	52.3	12.9	97.4	1,655.1
Income Eligible Single Family	Domestic Hot Water Measure, Oil	16	\$20.00	\$320.00	0.0	0.0	0.0	0.0	1.2	15.3
Income Eligible Single Family	Early Retirement Clothes Washer Elec DHW & Elec Dryer	124	\$770.00	\$95,480.00	72.9	1,020.8	11.4	9.1	29.6	414.4
Income Eligible Single Family	Early Retirement Clothes Washer Elec DHW & Gas Dryer	6	\$770.00	\$4,620.00	1.8	25.8	0.3	0.2	1.1	15.2
Income Eligible Single Family	Early Retirement Clothes Washer Gas DHW & Elec Dryer	206	\$770.00	\$158,620.00	67.4	943.1	10.5	8.4	42.8	598.8
Income Eligible Single Family	Early Retirement Clothes Washer Gas DHW & Gas Dryer	124	\$770.00	\$95,480.00	5.7	79.9	0.9	0.7	18.6	259.9
Income Eligible Single Family	Early Retirement Clothes Washer Oil DHW & Elec Dryer	186	\$770.00	\$143,220.00	60.8	851.5	9.5	7.6	44.1	617.4
Income Eligible Single Family	Early Retirement Clothes Washer Propane DHW & Elec Dryer	16	\$770.00	\$12,320.00	5.2	73.2	0.8	0.6	3.5	49.2
Income Eligible Single Family	HP Water Heaters	4	\$2,131.00	\$8,524.00	6.8	102.7	0.1	0.2	2.8	41.7
Income Eligible Single Family	MSHP - Electric Resistance	190	\$16,000.00	\$3,040,000.00	1,244.3	21,153.3	0.0	376.4	505.2	8,588.2
Income Eligible Single Family	Replacement Freezer	155	\$600.00	\$93,000.00	51.6	619.4	6.5	4.2	21.0	251.5
Income Eligible Single Family	Replacement Refrigerator	1,391	\$1,100.00	\$1,530,100.00	649.6	9,744.0	109.9	84.2	263.7	3,956.0

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Income Eligible Single Family	Smart Strips	2,369	\$20.00	\$47,380.00	185.4	926.8	18.7	25.7	75.3	376.3
Income Eligible Single Family	Weatherization, Electric	190	\$5,500.00	\$1,045,000.00	233.9	4,677.8	202.2	74.0	95.0	1,899.2
Income Eligible Single Family	Weatherization, Del Fuel	237	\$5,500.00	\$1,303,500.00	22.5	450.3	252.2	92.3	260.2	5,204.9
Income Eligible Single Family	Weatherization, Other	21	\$5,500.00	\$115,500.00	2.0	39.1	14.6	6.8	17.9	358.6
Income Eligible Single Family	Wi-Fi Thermostat - AC Only	26	\$275.00	\$7,150.00	1.7	18.3	0.8	0.0	0.7	7.4
Income Eligible Single Family	Wi-Fi Thermostat - Oil	31	\$275.00	\$8,525.00	2.0	21.8	1.0	0.0	7.8	86.1
Income Eligible Single Family	Wi-Fi Thermostat - Other	6	\$275.00	\$1,650.00	0.4	4.2	0.2	0.0	1.3	14.2
Income Eligible Single Family	Window AC Replacements	2,292	\$385.00	\$882,420.00	162.7	1,952.8	306.0	0.0	66.1	792.8
Income Eligible Multifamily	Aerator - Electric	35	\$5.00	\$175.00	1.2	8.4	0.1	0.2	0.5	3.4
Income Eligible Multifamily	Aerator - Oil	2	\$5.00	\$10.00	0.0	0.0	0.0	0.0	0.0	0.2
Income Eligible Multifamily	Air Sealing - Elec	6,120	\$1.05	\$6,426.00	6.1	122.4	1.5	1.0	2.5	49.7
Income Eligible Multifamily	Air Sealing - Elec w/AC	489	\$1.05	\$513.45	0.5	9.8	0.4	0.1	0.2	4.0
Income Eligible Multifamily	Air Sealing - Oil	31	\$100.00	\$3,100.00	0.0	0.0	0.0	0.0	2.5	50.5
Income Eligible Multifamily	CUSTOM CIRCULATOR	42,600	\$3.60	\$153,360.00	42.2	632.6	0.0	0.0	17.1	256.8
Income Eligible Multifamily	EISA Exempt Lighting - Common Int	400	\$32.00	\$12,800.00	74.4	74.4	10.6	16.5	30.2	30.2
Income Eligible Multifamily	Heat Pumps	463,000	\$3.09	\$1,430,670.00	463.0	9,260.0	5.5	546.3	188.0	3,759.6
Income Eligible Multifamily	Insulation - Elec with AC	5,885	\$2.40	\$14,124.00	5.9	147.1	1.5	1.0	2.4	59.7

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Income Eligible Multifamily	Insulation - Oil	28	\$180.00	\$5,040.00	0.0	0.0	0.0	0.0	2.3	57.1
Income Eligible Multifamily	Pipe Wrap DHW - Elec	5	\$3.00	\$15.00	0.1	1.7	0.0	0.0	0.0	0.7
Income Eligible Multifamily	Programmable Thermostat - Elec with AC	5	\$125.00	\$625.00	1.3	25.1	0.3	0.2	0.5	10.2
Income Eligible Multifamily	Showerhead - Elec	70	\$25.00	\$1,750.00	15.5	232.5	1.2	3.0	6.3	94.4
Income Eligible Multifamily	Showerhead - Oil	2	\$25.00	\$50.00	0.0	0.0	0.0	0.0	0.2	3.1
Income Eligible Multifamily	Smart Strips	70	\$23.00	\$1,610.00	5.7	28.4	0.6	0.8	2.3	11.5
Income Eligible Multifamily	VFD	22,098	\$2.70	\$59,664.60	21.9	328.2	0.0	0.0	8.9	133.2

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Table 354. Planned Measures for Gas Residential Programs

Program	Measure	Quantity	Incentive / Quantity	Total Incentives	Total Annual Gas Savings (MMBtu)	Total Lifetime Gas Savings (MMBtu)	Annual Carbon Reductions (Short Tons)	Lifetime Carbon Reductions (Short Tons)
Residential New Construction	Codes and Standards	1	\$0.00	\$0.00	1,507.2	30,144.3	88.2	1,763.4
Residential New Construction	Cooling - Tier 1	85	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	Cooling - Tier 2	58	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	Cooling - Tier 3	6	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	CP - Heating	8	\$310.00	\$2,480.00	69.4	1,734.0	4.1	101.4
Residential New Construction	CP - DHW	8	\$50.00	\$400.00	10.1	151.2	0.6	8.8
Residential New Construction	CP - Cooling	8	\$0.00	\$0.00	0.0	0.0	0.0	0.0

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Residential New Construction	DHW- Tier 1	85	\$50.00	\$4,250.00	47.2	707.6	3.7	55.2
Residential New Construction	DHW - Tier 2	58	\$150.00	\$8,700.00	45.2	678.6	3.5	52.9
Residential New Construction	DHW - Tier 3	6	\$150.00	\$900.00	6.3	93.8	0.5	7.3
Residential New Construction	Heating - Tier 1	85	\$1,050.00	\$89,250.00	557.8	13,945.3	43.5	1,087.7
Residential New Construction	Heating - Tier 2	58	\$1,975.00	\$114,550.00	480.2	12,006.0	37.5	936.5
Residential New Construction	Heating - Tier 3	6	\$2,300.00	\$13,800.00	66.5	1,662.8	5.2	129.7
Residential New Construction	MFHR - Cooling	35	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	MFHR - Heating	35	\$700.00	\$24,500.00	78.1	1,951.3	4.6	114.1
Residential New Construction	MFHR - Water Heating	35	\$700.00	\$24,500.00	77.7	1,165.5	4.5	68.2
Residential New Construction	Renovation Rehab - Cooling Tier 1, Gas	22	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	Renovation Rehab - Cooling Tier 2, Gas	15	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	Renovation Rehab - Cooling Tier 3, Gas	2	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	Renovation Rehab CP - Heating, Gas	2	\$310.00	\$620.00	12.5	312.8	0.8	19.9
Residential New Construction	Renovation Rehab CP - Cooling, Gas	2	\$0.00	\$0.00	0.0	0.0	0.0	0.0
Residential New Construction	Renovation Rehab CP - DHW, Gas	2	\$50.00	\$100.00	1.0	15.5	0.1	1.0
Residential New Construction	Renovation Rehab - DHW Tier 1, Gas	22	\$50.00	\$1,100.00	11.5	173.1	0.7	11.0
Residential New Construction	Renovation Rehab - DHW Tier 2, Gas	15	\$150.00	\$2,250.00	12.0	180.1	0.8	11.5
Residential New Construction	Renovation Rehab - DHW Tier 3, Gas	2	\$150.00	\$300.00	2.1	32.0	0.1	2.0
Residential New Construction	Renovation Rehab - Heating Tier 1, Gas	22	\$1,050.00	\$23,100.00	118.4	2,960.1	7.5	188.2

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Residential New Construction	Renovation Rehab - Heating Tier 2, Gas	15	\$1,450.00	\$21,750.00	149.6	3,739.8	9.5	237.8
Residential New Construction	Renovation Rehab - Heating Tier 3, Gas	2	\$2,535.00	\$5,070.00	26.7	667.9	1.7	42.5
Residential New Construction	Showerhead	15	\$0.00	\$0.00	5.4	80.8	0.4	6.1
Residential HVAC	Combo Condensing Boiler/Water Heater - 95% AFUE	1,243	\$950.00	\$1,180,850.00	11,096.4	255,216.9	850.8	19,567.7
Residential HVAC	ENERGY STAR ON DEMAND WATER HEATER 0.87 UEF	165	\$600.00	\$99,000.00	894.0	16,985.4	64.7	1,229.1
Residential HVAC	ENERGY STAR STORAGE WATER HEATER .64 UEF (med draw)	31	\$70.00	\$2,170.00	60.0	539.9	4.0	35.9
Residential HVAC	Forced Hot Water Boiler - >=95% AFUE	246	\$775.00	\$190,650.00	2,008.4	34,142.3	154.0	2,617.7
Residential HVAC	Furnace w/ ECM - 97% AFUE	409	\$525.00	\$214,725.00	1,341.9	22,812.1	102.9	1,749.0
Residential HVAC	Low Flow Showerhead	125	\$7.00	\$875.00	127.4	1,911.2	6.8	102.7
Residential HVAC	Programmable Thermostat	267	\$25.00	\$6,675.00	479.2	9,104.5	32.3	614.3
Residential HVAC	Thermostatic Shut-Off Valve	38	\$11.00	\$418.00	12.3	184.0	0.7	9.9
Residential HVAC	TSV Showerhead	40	\$15.00	\$600.00	41.5	621.8	2.2	33.4
Residential HVAC	WiFi Thermostat, Gas - Heat Only	1,075	\$75.00	\$80,625.00	2,600.3	28,603.8	175.5	1,930.0
Residential HVAC	WiFi Thermostat, Gas - Cooling and Heating	412	\$75.00	\$30,900.00	996.6	10,962.6	70.3	772.8
Residential HVAC	Triple Pane Windows	10	\$75.00	\$750.00	5.8	97.9	0.4	6.5
EnergyWise Single Family	Aerator	761	\$7.00	\$5,327.00	81.4	570.1	6.1	42.8
EnergyWise Single Family	Participants (Unique Account Numbers)	5,905	\$375.00	\$2,214,375.00	0.0	0.0	0.0	0.0
EnergyWise Single Family	Pipe Wrap	5,407	\$7.00	\$37,849.00	1,239.9	8,679.5	93.0	651.0
EnergyWise Single Family	Programmable thermostat	1,942	\$100.00	\$194,200.00	2,051.8	38,983.8	225.7	4,287.9
EnergyWise Single Family	Showerhead	1,050	\$30.00	\$31,500.00	890.9	13,363.6	66.8	1,002.3
EnergyWise Single Family	Weatherization	2,362	\$3,375.00	\$7,971,750.00	28,802.2	576,044.6	1,918.7	38,374.0
EnergyWise Single Family	WiFi thermostat	79	\$200.00	\$15,800.00	112.5	1,237.5	12.1	133.2
EnergyWise Multifamily	Air Sealing	1,620	\$100.00	\$162,000.00	1,101.6	22,032.0	94.8	1,895.4
EnergyWise Multifamily	Duct Insulation, MF	1	\$207.00	\$103.50	0.3	6.8	0.0	0.6
EnergyWise Multifamily	Duct Sealing	1	\$232.00	\$116.00	0.3	6.8	0.0	0.6

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EnergyWise Multifamily	Faucet aerator	80	\$3.00	\$240.00	13.4	93.7	0.8	5.9
EnergyWise Multifamily	Heating, Custom	420	\$214.00	\$89,880.00	420.0	6,300.0	24.6	368.6
EnergyWise Multifamily	Low Flow Showerhead - Showerhead	80	\$25.00	\$2,000.00	87.0	1,305.7	5.5	82.1
EnergyWise Multifamily	MF Shell Insulation	2,580	\$138.00	\$356,040.00	1,754.4	43,860.0	150.9	3,773.3
EnergyWise Multifamily	Pipe Wrap (Water Heating)	200	\$3.00	\$600.00	25.1	376.7	1.6	23.7
EnergyWise Multifamily	Programmable thermostat	80	\$125.00	\$10,000.00	60.4	1,148.0	7.6	143.7
Home Energy Reports	Existing Dual Fuel	64,187	\$0.00	\$0.00	59,052.0	59,052.0	3,454.5	3,454.5
Home Energy Reports	Existing Gas	11,919	\$0.00	\$0.00	10,965.5	10,965.5	641.5	641.5
Home Energy Reports	New Movers Dual Fuel	14,604	\$0.00	\$0.00	7,302.0	7,302.0	427.2	427.2
Income Eligible Single Family	Boiler	150	\$6,311.00	\$946,650.00	1,185.0	27,255.0	70.3	1,616.8
Income Eligible Single Family	Furnace	45	\$6,311.00	\$283,995.00	355.5	6,043.5	21.1	358.5
Income Eligible Single Family	Weatherization	350	\$6,311.00	\$2,208,850.00	4,340.0	86,800.0	267.1	5,342.1
Income Eligible Single Family	Wi-Fi Thermostat, Gas	40	\$273.00	\$10,920.00	111.6	1,227.6	6.5	71.8
Income Eligible Multifamily	Air Sealing	186	\$100.00	\$18,600.00	186.0	3,720.0	10.9	217.6
Income Eligible Multifamily	Duct Insulation LI	1	\$277.00	\$277.00	1.0	20.0	0.1	1.2
Income Eligible Multifamily	Duct Sealing	1	\$310.00	\$310.00	1.0	20.0	0.1	1.2
Income Eligible Multifamily	Faucet aerator	150	\$5.00	\$750.00	27.0	189.0	1.6	11.1
Income Eligible Multifamily	HEATING Custom LI	11,800	\$225.00	\$2,655,000.00	11,800.0	177,000.0	690.3	10,354.5
Income Eligible Multifamily	Hot Water - Custom	200	\$271.00	\$54,200.00	200.0	3,600.0	11.7	210.6
Income Eligible Multifamily	Low Flow Showerhead - Showerhead	150	\$25.00	\$3,750.00	175.5	2,632.5	10.3	154.0
Income Eligible Multifamily	Pipe Wrap (Water Heating)	40	\$3.00	\$120.00	5.4	81.0	0.3	4.7
Income Eligible Multifamily	Programmable thermostat	310	\$125.00	\$38,750.00	441.8	8,393.3	29.3	556.9

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Income Eligible Multifamily	Insulation	256	\$180.00	\$46,080.00	256.0	6,400.0	15.0	374.4
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Page 5: [1] Commented [RIE9R5]

RI Energy

9/3/2024 4:50:00 PM

Wifi tstats have compatibility issues and wiring complications that lead to call backs. Thus they are more expensive without significantly more savings. Customer can often get them cheaper due to frequent promos through RIE marketplace, and RISE lets them know about that.

Prog tstats are easier, simpler, quicker, cheaper. Better for seniors. Less callbacks. Same savings. Significantly less time at the assessment.

So, due to all that, wifi tstats are offered, but are much less common than prog tstats.

Page 5: [2] Commented [CJ10]

Craig Johnson

6/28/2024 12:25:00 PM

As reflected in Glenn and Richard's comments in this passage, some of these are measures and some are actions. Please be clear and differentiate between measures and actions.

Page 5: [3] Commented [RIE10R2]

RI Energy

7/30/2024 4:11:00 PM

Everything listed is "immediate energy saving opportunities that can quickly be addressed during the visit"

Page 5: [4] Commented [ML11]

Margie Lynch

6/11/2024 6:25:00 PM

Assess existing insulation levels as possible as well. I see this mentioned below in details, but it seems like at least a mention is warranted here.

Page 5: [5] Commented [RIE11R2]

RI Energy

7/30/2024 4:12:00 PM

Thanks. They do that, by nature can't audit without assessing what is there or what is not there. We say "will evaluate ... the building envelope..."

Page 1: [6] Formatted

Spencer Lawrence (Contractor)

8/2/2024 12:57:00 PM

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Page 6: [7] Commented [RIE12R2]

RI Energy

7/30/2024 4:12:00 PM

Auditors do look at the windows and speak with the homeowner where appropriate, particularly if it's something the homeowner is interested in.

▲

Page 6: [8] Commented [RF12R3]

Richard Faesy

8/19/2024 7:33:00 PM

If this is the case, then at least mention windows. Leaving them out makes it sound like they aren't considered.

▲

Page 6: [9] Commented [RF12]

Richard Faesy

6/9/2024 9:29:00 PM

What about windows, even if there aren't incentives available? If there are single-pane, broken or other inefficient windows that could benefit the weatherization improvements, they should be included.

▲

Page 6: [10] Commented [G13]

Glenn Reed

6/10/2024 6:41:00 AM

Maybe note that the Energy Action Plan also provides energy cost savings for all (key?) measures, as well as estimated measure costs

▲

Page 6: [11] Commented [RIE13R2]

RI Energy

7/30/2024 4:13:00 PM

Updated language. It does provide that info measure by measure and as a summary package.

▲

Page 6: [12] Commented [G14R3]

Glenn Reed

8/18/2024 8:24:00 PM

No proactive approach to electrification, even if it requires a blanket referral to OER's programs?

Discuss referral process to OER for customers that are interested in electrification.

▲

Page 6: [13] Commented [RIE14R4]

RI Energy

9/3/2024 4:51:00 PM

Information about CHRI is in the action plan provided to the customer when appropriate.

▲

Page 6: [14] Commented [RF14]

Richard Faesy

6/9/2024 9:32:00 PM

Including electrification/fuel switching, even if not incentivized with RIE rebates?

▲

Page 6: [15] Commented [RIE14R2]

RI Energy

7/30/2024 4:14:00 PM

The energy specialist will respond to customer interest on a case by case basis, but the programs are designed to implement RIE measures.

▲

Page 6: [16] Commented [G15R3]

Glenn Reed

8/18/2024 8:28:00 PM

Will this work for all customers, particularly older customers that aren't internet savvy?

Please develop and provide a leave behind. Rewiring America has materials that would work.

▲

Page 6: [17] Commented [RIE15R4]

RI Energy

9/3/2024 4:52:00 PM

We provide the customer information pointing them to Rewiring America, and the Energy Star information on Federal Tax Credits. Ultimately even the ESTAR page is vague, because of the issues with tax advice.

<https://homes.rewiringamerica.org/calculator>

<https://www.energystar.gov/about/federal-tax-credits>

▲

Page 6: [18] Commented [RIE15R2]

RI Energy

7/30/2024 4:16:00 PM

As of now RISE provides the customer a link to the Rewiring America incentive calculator, hosted by OER, that lists information on tax credit eligibility. The Company is wary of providing information on tax credits as we are not tax experts and their applicability varies widely depending on the homeowner's situation.

▲

Page 6: [19] Commented [G15]

Glenn Reed

6/10/2024 6:42:00 AM

Need to also include/integrate information on IRA tax credits

▲

Page 6: [20] Commented [RF16]

Richard Faesy

6/9/2024 9:30:00 PM

Is says "insulation contractor" above. Are these the same or different contractors? Clarify.

▲

Page 6: [21] Commented [RF17]

Richard Faesy

6/9/2024 9:34:00 PM

What does this have to do with health and safety?

Page 6: [22] Commented [RIE18R2]

RI Energy

7/30/2024 4:18:00 PM

It is recommended when needed. It is eligible for the \$250 PWB credit.

Page 6: [23] Commented [RF18]

Richard Faesy

6/9/2024 9:34:00 PM

Is mechanical ventilation recommended and incentivized?

Page 6: [24] Commented [RIE19R2]

RI Energy

7/30/2024 4:19:00 PM

Duct sealing avg is 2 hours. It is 100% if the ducts are in an unconditioned or semi-conditioned basement (sometimes it is the cause of draft issues for combustion appliances) or an attic.

Page 6: [25] Commented [RF20]

Richard Faesy

6/9/2024 9:35:00 PM

Does this include attic ventilation and mechanical ventilation? That's the presumption by following the previous sentence.

Page 6: [26] Commented [RIE20R2]

RI Energy

7/30/2024 4:18:00 PM

Made edits for clarity. Passive attic ventilation is part of the offer. Mechanical is PWB \$250 credit and can be through HEAT Loan like other PWBs.

Page 6: [27] Commented [G19R3]

Glenn Reed

8/18/2024 8:29:00 PM

Ok, but is there any mention of duct sealing in the text?

Page 6: [28] Commented [G21]

Glenn Reed

6/10/2024 6:45:00 AM

How prevalent are PWBs, or don't we know?

Page 6: [29] Commented [RIE21R3]

RI Energy

8/1/2024 4:17:00 PM

We have some data that was shared with the EWG and we can reshare it. We are currently working on updating it.

▲

Page 6: [30] Commented [RF21R4]

Richard Faesy

8/19/2024 7:36:00 PM

If this is the largest impediment, then we need to plan to figuring out how to address it, even if we don't pay for it now.

▲

Page 6: [31] Commented [RIE21R5]

RI Energy

9/3/2024 4:55:00 PM

We continue to grapple with the issue and have added details here and elsewhere about the problem, what we do now, some ideas moving forward. We welcome any work or value you can provide on this front. It will require other players and outside funding. It is an issue that goes beyond just EE.

▲

Page 6: [32] Commented [CJ21R2]

Craig Johnson

6/28/2024 12:32:00 PM

The Company does have some data on this front, and I would suggest the Plan include something, somewhere, that presents this data to show just how big of an issue it is.

▲

Page 6: [33] Commented [CJ22R2]

Craig Johnson

6/28/2024 12:34:00 PM

This obviously takes time, resources, and collaboration to do. I think something that would represent a significant improvement here is for the Company to put forward a roadmap to getting there.

▲

Page 6: [34] Commented [RF22]

Richard Faesy

6/9/2024 9:40:00 PM

We have been discussing PWBs for years now without significant resolution. Is there any way we can commit to setting up a program like CT's Residential Energy Preparation Service (REPS) <https://portal.ct.gov/deep/energy/conservation-and-load-management/weatherization-barrier-mitigation> or working with other state agencies and funds to do so?

▲

Page 6: [35] Commented [RIE22R3]

RI Energy

7/30/2024 4:24:00 PM

In CT DEEP took ownership of addressing PWB through the Residential Energy Preparation Services (REPS) Program. OER has been part of these discussions for as long as the Company has. We would look to state organization to take on this role. RIE would not be able to use SBC or programs would no longer be cost effective. DHS would be the best source for information on how much is spent on deferrals.

▲

Page 6: [36] Commented [RIE23R2]

RI Energy

8/1/2024 4:23:00 PM

We are working on it - e.g., to enable RISE to PM remediation bids.

The issue is mainly one of funding, which is further complicated by the Cost of Supply situation, already particularly bad for EW SF due to DF.

Page 6: [37] Commented [CJ23]

Craig Johnson

6/28/2024 12:40:00 PM

Do we have any data on how successful (or not) this approach has been? I'd venture to guess that simply providing the customers with this information may not be enough to actually help them move forward. Not saying we shouldn't still do this, more wondering if there is more we can do (e.g. following up with these customers, help connecting them with contractors instead of leaving it up to the customer to do that, etc.)

Page 6: [38] Commented [CJ24R2]

Craig Johnson

6/28/2024 12:36:00 PM

Recognizing that this write up is about market rate (not IE, which Richard has referenced), I agree with the overall take. The way this is written suggests that the \$250 certification incentive alleviates customers becoming confused or disheartened.

Page 6: [39] Commented [CJ24R4]

Craig Johnson

8/21/2024 8:33:00 PM

Can you provide any information on where the \$2.7M estimate comes from to project manage remediation?

Page 6: [40] Commented [RF24]

Richard Faesy

6/9/2024 9:44:00 PM

This is not nearly sufficient to overcome these barriers when costs are significantly higher. CT costs are \$6,000 - \$10,000 per job for vermiculite remediation, knob-and-tub wiring replacement, and mold and mildew remediation. \$250 is a non-starter for IE customers who don't have the resources yet are the ones who most need to address the barriers and receive weatherization.

Page 6: [41] Commented [RIE24R5]

RI Energy

9/3/2024 4:56:00 PM

Program data indicates that 75% of audits identify weatherization opportunities. Of those 75%, 55% have one or more "hard barriers" that would require remediation for Wx to proceed. 75% of those "hard barriers" go unresolved. The most common barriers are knob and tube, and mold/mildew. The estimated remediation cost is \$7500 for K&T, \$3600 for M&M. Assuming \$5500 as an average. We have 6k gas audits and 2k electric-heat audits in 2025 planned. Assuming the numbers above, we estimate 3,300 audits with Wx opps and hard barriers. 15% admin cost of a \$5500 job is \$825 to PM a PWB. That's \$2.7M in total admin, \$18.1M to remediate, \$20.9M combined. Note this doesn't include DF Wx and doesn't include backlog.

Page 6: [42] Commented [RIE24R3]

RI Energy

8/1/2024 4:19:00 PM

Again, this is the EW SF section, not the IE SF section. See comments above. We estimate \$2.7M needed to PM remediation for elec and gas customers in 2025, not including DF, not including \$ to remediate, and not including backlog. We are working to secure funding and certainly welcome assistance on this front, including state funds.

Page 6: [43] Commented [ML26]

Margie Lynch

6/11/2024 6:29:00 PM

I think the more likely outcome is that they will not proceed with weatherization at all.

Page 6: [44] Commented [RF25]

Richard Faesy

6/9/2024 9:42:00 PM

Customers won't remediate the barrier not participate in EnergyWise without someone to guide them through the remediation process, offering them funding (especially IE customers), and ensuring that the work is completed before re-enrolling them in the weatherization program.

Page 6: [45] Commented [RIE25R2]

RI Energy

8/1/2024 4:20:00 PM

IE SF provides money (both SBC and nonSBC) and manages the process to get remediation done. For EW SF, we are working to secure funding to have RISE get bids for remediation. As you know, we do not have a state agency like CT's REPS in RI.

Page 6: [46] Commented [RIE26R2]

RI Energy

8/1/2024 4:21:00 PM

We are aware the PWB situation for EW SF is far from ideal. It is challenging given the cost of supply situation following last year's hearings, and the high amounts spent on delivered fuels customers. We are working to secure non SBC funding to enable RISE to PM remediation, and have it integrated with the Wx scope to facilitate everything for the customer, and enable ease of HEAT Loan financing.

Page 7: [47] Commented [RIE30R2]

RI Energy

8/1/2024 4:21:00 PM

We are aware the PWB situation for EW SF is far from ideal. It is challenging given the cost of supply situation following last year's hearings, and the high amounts spent on delivered fuels customers. We are working to secure non SBC funding to enable RISE to PM remediation, and have it integrated with the Wx scope to facilitate everything for the customer, and enable ease of HEAT Loan financing.

Page 7: [48] Commented [RIE32R2]

RI Energy

8/1/2024 4:23:00 PM

We are working on it - e.g., to enable RISE to PM remediation bids.

The issue is mainly one of funding, which is further complicated by the Cost of Supply situation, already particularly bad for EW SF due to DF.

▲

Page 7: [49] Commented [CJ32]

Craig Johnson

6/28/2024 12:40:00 PM

Do we have any data on how successful (or not) this approach has been? I'd venture to guess that simply providing the customers with this information may not be enough to actually help them move forward. Not saying we shouldn't still do this, more wondering if there is more we can do (e.g. following up with these customers, help connecting them with contractors instead of leaving it up to the customer to do that, etc.)

▲

Page 7: [50] Commented [ML33]

Margie Lynch

6/11/2024 6:30:00 PM

As noted above, this information should be provided at the beginning of the program description.

▲

Page 8: [51] Commented [CJ38]

Craig Johnson

6/28/2024 12:46:00 PM

Strongly opposed to any approach that would exclude or limit services to DF customers. This program serves as a major point of entry to the Company's other programs that do provide the utility system benefits that the PUC has signaled as being important.

▲

Page 8: [52] Commented [RIE38R4]

RI Energy

9/5/2024 12:40:00 PM

We appreciate the sentiment, however we have not had any discussion with the PUC on this front and received no feedback from the Commission on our analysis of IRA measures using this approach, so it is unclear whether our justification arguments will be acceptable to the PUC.

▲

Page 8: [53] Commented [SC37]

Steven Chybowski

4/23/2024 9:14:00 AM

OER believes it is still important to continue to provide EnergyWise programming to delivered fuels customers, the co-benefits of this programming for delivered fuels customers is significant and readies their homes for a number of additional decarbonization measures

▲

Page 8: [54] Commented [CJ38R3]

Craig Johnson

8/21/2024 8:53:00 PM

The main thing I want to convey at this point is that the justification framework provides the support necessary to at minimum maintain services to DF customers. I provided some comments in the Main Text that point to many other reasons this is important (mostly along the AoC lines) that goes beyond the fact that this serves as a point of entry (which I will try to dig up something to point to, but know from time working in the EM&V groups that this program does generate uplift in others).

▲

Page 8: [55] Commented [RIE38R2]

RI Energy

7/30/2024 4:34:00 PM

This is part of the Justification discussion in the Main Plan Text. Please provide data/analysis to support this argument. We are working on similar arguments.

Page 8: [56] Commented [RF39R3]

Richard Faesy

6/9/2024 10:03:00 PM

Haven't we been collecting this data for a few years now? CT continues to find 10-25% barriered homes, with the lowest income homes having the highest barriers. Can we commit to developing a PWBs program structure in 2025 so that when funding is found, we can move ahead more quickly?

Page 8: [57] Commented [SC39]

Steven Chybowski

4/23/2024 9:19:00 AM

The improved tracking will make it easier for us to identify funds to address these issues. As a counterfactual, if RIE did not encounter any PWBs in a year, how would the Company project to do on annual targets and budget spending?

Page 8: [58] Commented [CJ39R4]

Craig Johnson

6/28/2024 12:48:00 PM

RIE Team - please take the recurring comments along this front as an indication that this is a priority for our team.

Page 8: [59] Commented [RIE39R2]

RI Energy

6/5/2024 1:22:00 PM

Thanks Steve, we agree. To your latter point, that is something we could theoretically try and figure out. Please reach out to Spencer to connect on this and discuss further.

Page 9: [60] Commented [RF40R3]

Richard Faesy

6/9/2024 10:07:00 PM

Is there any opportunity to use some of RI's LIHEAP funds since there is a DOE allowance for up to 15% of a state's funds to be used for PWBs?

Page 9: [61] Commented [RIE40R4]

RI Energy

7/30/2024 4:39:00 PM

We do leverage LIHEAP and WAP for IE SF. This is the EW SF section.

Page 9: [62] Commented [RIE40R2]

RI Energy

5/23/2024 3:26:00 PM

Noted, thanks Craig. All good ideas and things we are working on.

▲

Page 9: [63] Commented [CJ40]

Craig Johnson

4/26/2024 2:36:00 PM

Some other things to consider:

-Improving how we help customers along the way

-To extent this goes in the right direction, include plans surrounding how Company would use grant funds from EPA it has applied for with DEM

-Additional financial support for remediation, perhaps through a demonstration or pilot (I may add some comments on this later on).

▲

Page 9: [64] Commented [CJ43R3]

Craig Johnson

6/28/2024 12:51:00 PM

Good to hear that you are looking into it, but would like to see some detail in the Plan about how a relaunch of this will be designed (if different from before) and what additional information you can provide to alleviate some of the concerns the PUC had when they disallowed it in the 2024 Plan.

▲

Page 9: [65] Commented [CJ43]

Craig Johnson

4/26/2024 2:38:00 PM

What about moderate income enhanced incentives. Consensus was that PUC is opening to putting this back on the table, just that it needs better support. We should absolutely work on that.

▲

Page 9: [66] Commented [RIE43R4]

RI Energy

7/30/2024 4:45:00 PM

We have added text with current thoughts and numbers. We welcome any feedback to anticipate/alleviate PUC concerns with MI programs.

▲

Page 9: [67] Commented [RIE43R2]

RI Energy

6/5/2024 1:23:00 PM

We are looking into re-launching a moderate income enhanced incentive.

▲

Page 9: [68] Commented [CJ44R2]

Craig Johnson

8/21/2024 8:55:00 PM

To Glenn's point, it would be good if the program write up could speak to this a bit. Gives the Commission a better understanding of what the Company is up against without having real funding to address PreWx barriers.

▲

Page 9: [69] Commented [G44]

Glenn Reed

8/18/2024 8:41:00 PM

Still haven't spoken to the frequency of PWBs and how often they prevent Wx from proceeding.

▲

Page 9: [70] Commented [RF45R3]

Richard Faesy

6/9/2024 10:07:00 PM

Is there any opportunity to use some of RI's LIHEAP funds since there is a DOE allowance for up to 15% of a state's funds to be used for PWBs?

▲

Page 9: [71] Commented [CJ45]

Craig Johnson

4/26/2024 2:36:00 PM

Some other things to consider:

-Improving how we help customers along the way

-To extent this goes in the right direction, include plans surrounding how Company would use grant funds from EPA it has applied for with DEM

-Additional financial support for remediation, perhaps through a demonstration or pilot (I may add some comments on this later on).

▲

Page 9: [72] Commented [RIE45R2]

RI Energy

5/23/2024 3:26:00 PM

Noted, thanks Craig. All good ideas and things we are working on.

▲

Page 9: [73] Commented [RIE45R4]

RI Energy

7/30/2024 4:39:00 PM

We do leverage LIHEAP and WAP for IE SF. This is the EW SF section.

▲

Page 9: [74] Commented [RIE46R2]

RI Energy

9/5/2024 12:47:00 PM

Please refer to section 5.4.3 of main text.

▲

Page 10: [75] Commented [RIE50R3]

RI Energy

9/5/2024 12:50:00 PM

Yes this is targeted to natural gas because electric-heat is already 100% and DF because of the PUC focus.

▲

Page 10: [76] Commented [CJ50R2]

Craig Johnson

8/23/2024 9:57:00 AM

I'm certain we know the answer to this has to do with the PUC rulings. That said, we have to reiterate that we are not in favor of this approach and the justification framework should provide the evidence needed to extend this offering to all customer segments.

Page 10: [77] Commented [RIE51R2]

RI Energy

9/5/2024 12:51:00 PM

For a number of reasons (namely high cost and EWSF being - \$10M in the 'new' Cost of Supply lens, and previous feedback from the PUC on this) we are pursuing nonSBC funds for this.

Page 10: [78] Commented [RIE51]

RI Energy

8/2/2024 3:52:00 PM

Please note, this \$1.2M is not currently reflected in the 2nd draft BCR models. We are working to refine the model and accounting methodology, but this text should hopefully provide enough for comments. Also note that the increase of 10% is over an already greatly increased baseline, due to shifting gas audits to gas.

Page 1: [79] Formatted

Spencer Lawrence (Contractor)

8/2/2024 12:57:00 PM

Right

Page 13: [80] Commented [RIE55R2]

RI Energy

9/5/2024 12:52:00 PM

Looking at IE SF as a whole, it's \$12.5M in direct measure incentive spend planned for 2025 right now.

10% (\$1.2M) of that is boiler and furnace incentives - that's the only new combustion going in. \$1M was removed earlier this year previously allocated to new delivered fuel heating system replacements.

37% (\$4.7M) is weatherization. 31% (\$3.9M) is split between window AC replacements and converting electric heat to heat pumps (the majority is allocated to the latter). Appliances are 18% at \$2.3M. 3% of the budget (\$371k) is to pay for energy audits.

We can look into seeing if furnaces in particular could be shifted to CHRI for heat pumps. Boilers would be harder and more expensive but furnaces easier due to ducting already in place.

Page 13: [81] Commented [RIE55]

RI Energy

8/30/2024 12:10:00 PM

From Acadia:

While the overall gas portfolio budget has been lowered, the Company does propose a significant increase (60%) of energy savings goals for gas income eligible customers. We would like to see the proportion of gas expenditures which are for new gas equipment versus weatherization or control measures. While weatherization has value regardless of heating fuel type, particularly for income eligible customers, investments in new gas equipment are counter to Rhode Island's climate goals.

Page 13: [82] Commented [RF59]

Richard Faesy

6/10/2024 8:33:00 PM

What other benefits besides smaller time commitment that you may want to note?

Page 13: [83] Commented [RIE60R2]

RI Energy

7/30/2024 4:51:00 PM

No. Same person. Changed it to auditor.

Page 13: [84] Commented [RF60]

Richard Faesy

6/10/2024 8:43:00 PM

Is this a different person than the HEA?

Page 13: [85] Commented [RF61]

Richard Faesy

6/10/2024 8:37:00 PM

Plural? They usually have more than one energy source.

Page 13: [86] Commented [L(62R7]

Lawrence, Spencer (Contractor)

9/3/2024 11:20:00 AM

This would be tricky - CAC end of life, presumably they have gas furnace, not necessarily end of life - raises fuel switching complications. Could talk to OER about it.

Page 13: [87] Commented [RF62R4]

Richard Faesy

8/19/2024 7:48:00 PM

Or, what about replacing end of life CACs with central heat pumps?

Page 13: [88] Commented [RIE62R9]

RI Energy

9/5/2024 12:54:00 PM

This would be tricky - CAC end of life, presumably they have gas furnace, not necessarily end of life - raises fuel switching complications. Could talk to OER about it.

Page 13: [89] Commented [RF62]

Richard Faesy

6/10/2024 8:44:00 PM

What about the cooling system and water heater?

Page 13: [90] Commented [SL62R8] Spencer Lawrence (Contractor) 9/4/2024 1:20:00 PM

We can look into CAC > HP end of life but presumably it's a furnace and thus fuel switching. We'd need to work with OER on this.

Page 13: [91] Commented [G62R3] Glenn Reed 8/19/2024 6:35:00 AM

What about taking advantage of end of life situations, including conversions to HPs?

Page 13: [92] Commented [DB62R5] Dagher, Brendan 9/3/2024 10:46:00 AM

I didn't see anything about this in the ClearResult scope of work. @LeGrand, Carinel Josephine do you know if we encourage customers with end-of-life central cooling systems that need replacing to convert to heat pumps? Do we direct them to any federal or state programs?

Page 13: [93] Commented [RIE62R2] RI Energy 7/30/2024 4:52:00 PM

We do have a protocol for replacing window AC units and we talk to customers about replacing and downsizing water heaters. We do not, however, replace central cooling systems as it is not cost-effective.

Page 13: [94] Commented [DB62R6] Dagher, Brendan 9/3/2024 10:47:00 AM

@Lawrence, Spencer (Contractor) does end of life get us around fuel switching restrictions? If we don't know the answer to this q in general, let's maybe just say "We are ensuring that customers are educated on the available options, including converting to heat pumps through the appropriate pathways" or something like that. And then we can follow up with CR.

Page 13: [95] Commented [RIE63R2] RI Energy 7/30/2024 4:53:00 PM

This is not in scope for the Income Eligible Services program. However, at customer expos and the Rhode Island Home Show, we have directed customers to state-offered programs and resources when asked.

Page 13: [96] Commented [RIE64R10] RI Energy 9/5/2024 12:54:00 PM

Thanks Craig - you are right and summed it up well. I am going to just leave it as 'thermostat' for now but we do both prog and wifi based on preference and situation (eg c wire and complications).

▲

Page 13: [97] Commented [64R8]

LeGrand, Carinel Josephine

9/3/2024 9:49:00 AM

I have an email out and waiting for a response.

▲

Page 13: [98] Commented [CJ64R4]

Craig Johnson

8/19/2024 5:02:00 PM

Should be both....BC Model indicates Programmable and WiFi are both offered. Should depend on whether or not the auditor can easily install without need of electrician/rewiring efforts. My suggestion would be for RIE to just add a little clarification here to indicate that thermostats means programmable or WiFi.

▲

Page 13: [99] Commented [SL64R7]

Spencer Lawrence (Contractor)

9/3/2024 11:27:00 AM

@LeGrand, Carinel Josephine LMK if you hear back from any CAPs about programmable thermostats.

If we don't get any clarity by COB Wednesday I guess we'll have to figure out a good way to say "We are looking into it"

▲

Page 13: [100] Commented [DB64R6]

Dagher, Brendan

9/3/2024 10:49:00 AM

I changed this in the text to just WiFi thermostats because when I reviewed the planning quantities, they were set a zero for programmable. However, Carinel responded in the other working doc that the original text was a reference to both WiFi and programmable.

▲

Page 13: [101] Commented [SL64R5]

Spencer Lawrence (Contractor)

8/27/2024 3:06:00 PM

Needs response. Re; Wifi vs prog tstat during site visit vs after

▲

Page 13: [102] Commented [G64R3]

Glenn Reed

8/19/2024 6:36:00 AM

But only programmable thermostats?

▲

Page 13: [103] Commented [SL64R9]

Spencer Lawrence (Contractor)

9/5/2024 11:25:00 AM

Thanks Craig - you are right and summed it up well. I am going to just leave it as 'thermostat' for now but we do both prog and wifi based on preference and situation (eg c wire and complications).

▲

Page 13: [104] Commented [G65R3]

Glenn Reed

8/19/2024 6:37:00 AM

Again, what about end of life situations? Are you properly modeling these to capture the equipment replacement capital cost benefits? And what about treating clothes washer/dryer replacements as a combined measure as in MA?

Page 13: [105] Commented [RIE65R2]

RI Energy

7/30/2024 4:54:00 PM

We are not currently offering clothes dryers as an option for evaluation or replacement as the current technology is not cost-effective.

Page 14: [106] Commented [DB69R5]

Dagher, Brendan

9/3/2024 10:59:00 AM

This was the response we received from Dave MacLellan. I think the explanation requires some insight from someone close to the work on the CR team.

Page 14: [107] Commented [RIE70R2]

RI Energy

7/30/2024 5:11:00 PM

The low income rate uses LIHEAP as one option to qualify for the rate. The state LIHEAP requirements, determined by DHS, are based on SMI. Other eligibility requirements include participation in:

SNAP

SSI

Medicaid, RI Works

Public Assistance

The additional criteria expand the population of eligible customers beyond SMI.

Page 14: [108] Commented [ML70]

Margie Lynch

6/11/2024 6:43:00 PM

Has the Company examined differences—if any—between Area Median Income and SMI? If AMI is higher, using that as an eligibility criteria could expand pool of potential participants.

Page 18: [109] Commented [RIE87R4]

RI Energy

9/3/2024 5:13:00 PM

We agree, it's a big issue that needs multiple actors and multiple funding sources.

Page 18: [110] Commented [SL88R2] Spencer Lawrence (Contractor) 9/4/2024 1:25:00 PM

It includes a variety of things, including your list. We are working to refine and systematize it. DHS/WAP/LIHEAP have their own rules but there is significant overlap.

Page 18: [111] Commented [RIE88R3] RI Energy 9/5/2024 12:57:00 PM

It includes a variety of things, including your list. We are working to refine and systematize it. DHS/WAP/LIHEAP have their own rules but there is significant overlap.

Page 18: [112] Commented [RF88] Richard Faesy 8/19/2024 8:59:00 PM

Good. What does this include? Knob and tube wiring? Asbestos-like material? Vermiculite? Water or structural issues? Are there limits?

Page 18: [113] Commented [RIE90R2] RI Energy 8/1/2024 4:38:00 PM

The funding can cover cooling and hot water, but it's not normally a standalone project. These upgrades are normally integrated with other measures.

Page 18: [114] Commented [RF90] Richard Faesy 6/10/2024 10:35:00 PM

Not cooling systems or hot water too? The sentence before talks about heating/cooling and hot water, so why doesn't the funding cover cooling and hot water?

Page 18: [115] Commented [RF91] Richard Faesy 6/10/2024 10:39:00 PM

Oh, heating and cooling now but not water heating? Please be consistent, clear and say what you mean.

Page 18: [116] Commented [RIE91R2] RI Energy 8/1/2024 4:41:00 PM

Re-visited text throughout section and updated to make more consistent. It's important to note that only some cooling (e.g. window units) and water heating systems are eligible.

Page 18: [117] Commented [G91R3] Glenn Reed 8/19/2024 7:10:00 AM

The discussion on these end uses need to be clear, detailed, and consistent

Page 18: [118] Formatted **Dagher, Brendan** **7/30/2024 10:41:00 AM**

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Page 18: [119] Formatted **Spencer Lawrence (Contractor)** **7/30/2024 11:48:00 AM**

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Page 19: [120] Commented [RIE92R4] **RI Energy** **8/1/2024 4:39:00 PM**

Demand is not currently the issue. There are operational challenges with a few CAP agencies that the Company is addressing with the actions listed in the above response and listed out in the "General Program Improvement" subsection.

Page 19: [121] Commented [RF92R3] **Richard Faesy** **6/10/2024 10:48:00 PM**

Please explain how these moves will result in driving more demand.

Page 19: [122] Commented [CJ92R5] **Craig Johnson** **8/21/2024 9:24:00 PM**

I'm skeptical that operational challenges are the sole driver of underperformance, but am willing to see if these changes result in the program hitting its savings goals next year.

Page 19: [123] Commented [RIE92R2] **RI Energy** **6/5/2024 1:24:00 PM**

We are hiring additional energy auditors and program staff to support the weatherization programs at BVCAP & CAP of Providence. Updating work flow processes to be more efficient including requiring less clerical data input from auditors and instead handing that off to office/admin staff. The idea is to free the auditors up to handle additional audits in a faster time frame.

Page 19: [124] Commented [SC93] **Steven Chybowski** **4/23/2024 9:44:00 AM**

Just asking in response to feedback OER received on our HER/HEAR RFI, does bulk purchasing equipment run into challenges of the bulk purchased product not fitting every home?

Page 19: [125] Commented [RIE93R2] **RI Energy** **6/5/2024 1:24:00 PM**

Our understanding from speaking with team members is that it is indeed a balancing act, and there are pros and cons to different approaches. Discounts can be had by ordering larger quantities, but larger quantities can introduce warehousing and holding costs. Reducing the number of model offerings reduces selection; a program in western Pennsylvania has only four models, all top freezers, but that reduces customer satisfaction.

▲

Page 19: [126] Commented [RIE94R2]

RI Energy

6/5/2024 1:25:00 PM

The goal is to have up to four regionally located appliance vendors.

▲

Page 19: [127] Commented [CJ95]

Craig Johnson

4/26/2024 2:54:00 PM

See other comments on Pre-Wx barriers.

▲

Page 19: [128] Commented [RF97R3]

Richard Faesy

6/10/2024 10:59:00 PM

What are your plans to set up a system to deliver these PWB services? You have been researching for a few years. It would be helpful to hear what the plans will be for they system you will set up.

▲

Page 19: [129] Commented [CJ97]

Craig Johnson

4/26/2024 2:36:00 PM

Some other things to consider:

- Improving how we help customers along the way

- To extent this goes in the right direction, include plans surrounding how Company would use grant funds from EPA it has applied for with DEM

- Additional financial support for remediation, perhaps through a demonstration or pilot (I may add some comments on this later on).

▲

Page 19: [130] Commented [RIE97R4]

RI Energy

8/1/2024 4:46:00 PM

IE SF provides many services and turnkey management of PWBs. We are working on the data and reporting. Text was added and edited to clarify.

EW SF has good data but no \$\$ and no PM'ing. We are working on that as well.

We welcome any assistance with addressing the problem of PWBs in RI.

▲

Page 19: [131] Commented [RIE97R2]	RI Energy	5/23/2024 3:26:00 PM
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Noted, thanks Craig. All good ideas and things we are working on.

▲

Page 19: [132] Commented [RIE98R2]	RI Energy	9/3/2024 5:14:00 PM
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Thanks, a dedicated working group could be a good approach.

▲

Page 19: [133] Commented [RF98]	Richard Faesy	8/19/2024 9:10:00 PM
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These are all good, but may benefit from a dedicated working group (similar to DEI efforts) focused on developing a plan to address this important issue. This could involve researching other states (much of this work has already been done; <https://e4thefuture.org/overcoming-weatherization-barriers-new-toolkit/>), engaging other related state agencies, securing some of the LIHEAP funds, exploring grants, and designing a complimentary service that can address referrals to fix the issue and put the homes back in the queue for weatherization work. Look at what CT has done as a model, but customize it and right-size it to RI.

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Page 19: [134] Formatted	Spencer Lawrence (Contractor)	8/5/2024 12:52:00 PM
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Page 19: [135] Commented [RIE99R2]	RI Energy	8/1/2024 4:46:00 PM
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Demand is not currently an issue.

▲

Page 19: [136] Commented [RF99]	Richard Faesy	6/10/2024 11:04:00 PM
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These sound like good capacity building, but how will you drive demand and participation to meet goals?

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Page 20: [137] Formatted	Spencer Lawrence (Contractor)	8/5/2024 11:37:00 AM
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Page 1: [139] Formatted **Spencer Lawrence (Contractor)** **8/2/2024 12:57:00 PM**

Right

Page 25: [140] Commented [RIE119R2] **RI Energy** **8/1/2024 5:16:00 PM**

Thanks for the feedback. We have added some detail to the text. We recognize that multifamily is a challenging sector and we have included additional ideas in this draft that we are working on. We welcome your thoughts on specific ideas or steps we should be taking.

Page 25: [141] Commented [RF119] **Richard Faesy** **6/12/2024 5:09:00 PM**

These sound like small tweaks and not the big program approach changes needed to move the program to meet goals. What big steps will you be taking to make big changes to jump start this sector?

Page 25: [142] Commented [CJ120R3] **Craig Johnson** **6/28/2024 1:20:00 PM**

Okay, if they don't think it is worthwhile, I'd like to better understand why. And if that is the case, I would expect that they have alternative approaches to recommend that will help drive more activity in this customer segment.

Page 25: [143] Commented [RIE120R4] **RI Energy** **8/2/2024 1:47:00 PM**

We will continue to explore this as an option with RISE among other program enhancements. We're open to any multifamily-specific examples you can share.

Page 25: [144] Commented [CJ120] **Craig Johnson** **4/26/2024 2:42:00 PM**

Would like to see dedicated program strategy pathways for different types of MF building types. Take lessons learned from C&I team who have dedicated pathways for different business types that have different needs.

Page 25: [145] Commented [RIE120R2] **RI Energy** **6/5/2024 1:26:00 PM**

We'll talk about it with RISE and see if the team thinks it is worthwhile.

Page 25: [146] Commented [CJ120R5] **Craig Johnson** **8/21/2024 9:34:00 PM**

This is something we can certainly help brainstorm on and maybe something we can address through sector team work in 2025. Can the Company commit to this in the Plan?

Page 25: [147] Commented [RIE120R6]

RI Energy

8/28/2024 4:12:00 PM

Added text. The C&I analogy isn't quite apt given that C&I has significantly more variation of business and thus building needs. If you have examples of this being done for MF in other programs please let us know.

Page 25: [148] Commented [RIE121R4]

RI Energy

8/28/2024 4:13:00 PM

Thanks Craig. Contract is up at end of 2025.

Page 25: [149] Commented [CJ121R3]

Craig Johnson

8/21/2024 9:37:00 PM

But MF and EW at least haven't gone out to bid in years. Last two opportunities to go out to bid were put on hold due to COVID and sale of the Company as I recall.

Probably not looking for a commitment in the 2025 Plan on this, but would like to take some time at some point soon to get a better understanding of where these contracts are and when the next opportunity is to go out to bid.

Page 25: [150] Commented [RF121]

Richard Faesy

6/12/2024 4:59:00 PM

Are we locked into RISE for this or will we be going out to bid? There are firms that specialize in MF (like MaGrann Associates) who may provide some new approaches and program performance. When is this going out to bid again?

Page 25: [151] Commented [RIE121R2]

RI Energy

8/1/2024 5:17:00 PM

Vendor contracts are put out to bid on a regular basis.

Page 25: [152] Commented [RIE122R4]

RI Energy

9/3/2024 5:15:00 PM

It's locked in at this point but if you have examples of performance incentives for other MF programs, let us know.

Page 25: [153] Commented [RIE122R2]

RI Energy

8/2/2024 1:48:00 PM

These are locked in at an agreed upon level.

Page 25: [154] Commented [CJ122R3]

Craig Johnson

8/21/2024 9:38:00 PM

Understood. It's unfortunate we didn't take that as an opportunity to be a little more aggressive.

Page 25: [155] Commented [CJ122]

Craig Johnson

6/28/2024 1:23:00 PM

Noting that we discussed these at a recent sector team meeting and it was my sense at least that the incentives may not be significant enough to drive the LV. I'm not sure if these are something the Company can revisit with the LV, or if they are locked in at an agreed upon level.

Page 25: [156] Commented [CJ123]

Craig Johnson

6/28/2024 1:25:00 PM

Please elaborate. What do we mean by exploring? I'd also like to take a lesson learned from the PUC hearings last year with respect to disallowance of the mod-income enhanced 100% incentive. The Plan narrative (and BC Models) should say how the Company will carve this out from the rest of the market-rate offering, and how it will address potential budget constraints.

Page 25: [157] Commented [RIE123R2]

RI Energy

8/2/2024 1:48:00 PM

This is accounted for in the plan budget (part of the weatherization measures) and can be leveraged as an option to address underspend and/or lagging savings performance.

Page 25: [158] Commented [RIE124R2]

RI Energy

8/1/2024 5:19:00 PM

Added some weatherization measures in the introductory paragraph.

Page 25: [159] Commented [RF124]

Richard Faesy

6/12/2024 5:00:00 PM

No weatherization measures are noted in the introductory paragraph of the MF section, so make sure to align that with this statement.

Page 25: [160] Commented [CJ125R3]

Craig Johnson

8/21/2024 9:39:00 PM

Okay, leaving open in hopes that that conversation happens and allows for some additional clarity to be provided within the Plan.

Page 25: [161] Commented [RIE125R4]

RI Energy

9/3/2024 5:16:00 PM

We are trying this out in Q4. It's a start and we can re-evaluate as needed. We will see how the market responds to this initial offer.

▲

Page 25: [162] Commented [CJ125]

Craig Johnson

8/2/2024 1:49:00 PM

How will the Company determine if all occupants are renters?

Separately, is all necessary? It's possible this may limit the pool. I wonder if a similar approach used in IE SF could be applied here, where maybe not all need to be renters, but a certain % of them. See Margie's response to Steve below.

▲

Page 25: [163] Commented [RIE125R2]

RI Energy

8/2/2024 1:50:00 PM

This was modeled after what RISE is doing in Massachusetts and as a strategy to further equity goals of reaching more renters. We will discuss other % renter options and scenarios with RISE.

▲

Page 25: [164] Commented [SC126]

Steven Chybowski

4/23/2024 9:24:00 AM

I support this plan as a strategy to deal with the split incentive issue - are we seeing examples of this in other jurisdictions?

▲

Page 25: [165] Commented [ML126R3]

Margie Lynch

6/11/2024 6:54:00 PM

While still evolving, the current proposal in MA in 21 designated equity communities is to provide enhanced incentives to rental properties in which 50% or more of occupants are renters: 100% weatherization, 100% PWB and pre-electrification coverage, 100% heat pump incentive

▲

Page 25: [166] Commented [RIE126R2]

RI Energy

6/5/2024 1:26:00 PM

The idea comes from Massachusetts. We are also looking into how other PAs handle the split incentive.

▲

Page 25: [167] Commented [RIE127R2]

RI Energy

8/1/2024 5:23:00 PM

These are all good questions and we are trying new things in multifamily but it remains a difficult market. We have researched programs across the country, worked with E Source on reviewing multifamily innovations from other programs, and thought about different approaches—but our research indicates this is not an easy segment to work with in any jurisdiction.

▲

Page 25: [168] Commented [RF127]

Richard Faesy

6/12/2024 5:04:00 PM

Is this going to be enough to get this program to meet goals? What other new, innovative, creative ways can we implement to move this market? What can we leverage or use to further incentivize? What are other states doing that we should learn from and implement in RI? We need to really kick start this program since it focuses on our target DEI population.

▲

Page 25: [169] Commented [RF128]

Richard Faesy

6/12/2024 5:05:00 PM

Good start. How about broadening these to other landlord roundtables around the state with a commitment to implement solutions from what you hear?

▲

Page 25: [170] Commented [RIE128R2]

RI Energy

8/1/2024 5:24:00 PM

Will consider following analysis of progress in Central Falls.

▲

Page 25: [171] Commented [RF129]

Richard Faesy

6/12/2024 5:07:00 PM

If you are billing these as “listening sessions”, you may want to be cautious about not pushing too hard. Maybe listen first, then go back and implement the best ideas you hear before advocating.

▲

Page 25: [172] Commented [RIE130R4]

RI Energy

9/5/2024 5:59:00 PM

Those are good points and we will keep that in mind as things develop further.

▲

Page 25: [173] Commented [ML130R3]

Margie Lynch

8/19/2024 3:25:00 PM

It’s really important that program designs be shaped to be as appealing as possible to the property owners. Just conducting outreach for an offer that isn’t appealing isn’t enough. Hopefully the listening sessions can play a role with this. I’ve also suggested leveraging the Equity Working Group for conversations like this.

▲

Page 25: [174] Commented [ML130]

Margie Lynch

6/11/2024 6:56:00 PM

This seems like a great approach and it’s great to see mention of scaling. I look forward to hearing results.

▲

Page 25: [175] Formatted

Dagher, Brendan

8/2/2024 2:47:00 PM

Tab stops: 6.5", Right

▲

Page 25: [176] Commented [SC133] **Steven Chybowski** **4/23/2024 9:21:00 AM**

I would like to hear more details and an update on this demonstration

▲

Page 25: [177] Commented [ML133R2] **Margie Lynch** **6/11/2024 6:56:00 PM**

Please expand at least a little bit on what this is.

▲

Page 25: [178] Commented [SC132] **Steven Chybowski** **4/23/2024 9:21:00 AM**

I would like to hear more details and an update on this demonstration

▲

Page 25: [179] Commented [RIE134R2] **RI Energy** **6/5/2024 1:27:00 PM**

We are still in contract negotiations and will provide an update when available.

▲

Page 25: [180] Commented [SA134] **Susan AnderBois** **4/11/2024 2:22:00 PM**

Can we get an update on this? How's it been going?

▲

Page 25: [181] Commented [GR134R3] **Glenn Reed** **6/10/2024 9:25:00 AM**

Provide a brief footnote describing this effort

▲

Page 25: [182] Commented [RIE132R2] **RI Energy** **6/5/2024 1:27:00 PM**

We are still in contract negotiations and will provide an update when available.

▲

Page 25: [183] Commented [CJ131] **Craig Johnson** **6/17/2024 9:14:00 AM**

Noting that this was referenced in the DPA Attachment as an Assessment last year. Please ensure consistent terminology.

▲

Page 25: [184] Commented [CJ135] **Craig Johnson** **6/17/2024 9:13:00 AM**

We would like to see more information about this in the Plan (both in Res and DPA attachments). The DPA attachment last year indicated that this was being positioned as an approach that could help overcome MF barriers about upfront costs.

▲

Page 25: [185] Commented [SC138]	Steven Chybowski	4/23/2024 9:21:00 AM
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I would like to hear more details and an update on this demonstration

▲

Page 25: [186] Commented [CJ136]	Craig Johnson	6/17/2024 9:14:00 AM
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Noting that this was referenced in the DPA Attachment as an Assessment last year. Please ensure consistent terminology.

▲

Page 25: [187] Commented [RIE139R2]	RI Energy	6/5/2024 1:27:00 PM
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We are still in contract negotiations and will provide an update when available.

▲

Page 25: [188] Commented [SC137]	Steven Chybowski	4/23/2024 9:21:00 AM
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I would like to hear more details and an update on this demonstration

▲

Page 25: [189] Commented [ML138R2]	Margie Lynch	6/11/2024 6:56:00 PM
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Please expand at least a little bit on what this is.

▲

Page 25: [190] Commented [SA139]	Susan AnderBois	4/11/2024 2:22:00 PM
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Can we get an update on this? How's it been going?

▲

Page 25: [191] Commented [RIE137R2]	RI Energy	6/5/2024 1:27:00 PM
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We are still in contract negotiations and will provide an update when available.

▲

Page 25: [192] Commented [GR139R3]	Glenn Reed	6/10/2024 9:25:00 AM
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Provide a brief footnote describing this effort

▲

Page 27: [193] Commented [RIE148R2]

RI Energy

9/5/2024 6:00:00 PM

The HVAC program maintains a contractor list. Those contractors have completed a program training. It does not go as far as certain contractor network requirements and elements such as Efficiency VT.

▲

Page 27: [194] Commented [RF148]

Richard Faesy

8/21/2024 8:32:00 PM

It is probably time to recognize contractors who are trained and engaged with the programs in order to ensure they meet standards and so we can promote them to customers. As I mentioned on the call the other day, Efficiency Vermont's "Efficiency Excellence Network" can serve as a good example of elements to consider. See <https://www.efficiencyvermont.com/trade-partners/efficiency-excellence-network> for details.

▲

Page 27: [195] Commented [RF149]

Richard Faesy

6/12/2024 5:12:00 PM

Any plans for a qualified contractor network so that we have a network of trained, certified and trusted contractors to promote?

▲

Page 27: [196] Commented [RIE149R2]

RI Energy

8/2/2024 1:55:00 PM

RIE has a qualified participating licensed contractor list on the website that requires them to meet certain RIE requirements to remain on the list.

▲

Page 27: [197] Commented [RF149R3]

Richard Faesy

8/21/2024 8:39:00 PM

See comments about EVT's Efficiency Excellence Network.

▲

Page 27: [198] Commented [RIE151R2]

RI Energy

8/2/2024 1:56:00 PM

RIE has a qualified list of contractors on the website

▲

Page 27: [199] Commented [RF151]

Richard Faesy

6/12/2024 5:13:00 PM

Should we look at an installers network?

▲

Page 27: [200] Commented [RF151R3]

Richard Faesy

8/21/2024 8:44:00 PM

Are they empowered and incentivized to promote the programs? Does RIE promote them?

▲

Page 30: [201] Commented [G157R3]

Glenn Reed

8/19/2024 7:28:00 AM

There is little evidence of this potential for backsliding from MA customer data.

▲

Page 30: [202] Commented [GR157]

Glenn Reed

6/11/2024 9:02:00 AM

If gas space and water heating incentives are continued in 2025, limit them to replacement of non-condensing equipment as MA and CT did prior to their phasing out of gas-fired equipment incentives.

▲

Page 30: [203] Commented [RIE157R4]

RI Energy

9/5/2024 6:02:00 PM

How do the incentives and cost-benefit calculations compare between MA and RI? Feel free to share some data including the MA customer data showing no backsliding.

▲

Page 30: [204] Commented [RIE157R2]

RI Energy

8/2/2024 2:00:00 PM

The cost to implement pre-check for each heating system would create a customer barrier and our concern is that they may install non-efficient equipment rather than go through extensive process

▲

Page 30: [205] Commented [CJ158]

Craig Johnson

4/26/2024 2:44:00 PM

Where does gas equipment fit in this program? We've slowly been phasing out gas equipment, but would like to see that push result in no more incentives for gas equipment in 2025.

▲

Page 30: [206] Commented [RIE158R4]

RI Energy

9/5/2024 6:03:00 PM

CFL to LED is not apples to apples here. That's electric to electric, lighting to lighting with very good ROI. The measure TRC was also considerably lower.

Here you are talking about going from cooling to heating/cooling or heating to cooling/heating, fuel switching, and TRCs and Incentives 100x - 1000x more.

You frequently bring this up without noting that MA and CT did it through laws or PUC regs, and that they have different regulatory environments, stated goals, and cost-benefit frameworks, and SBC amounts. This conversation would benefit from some nuance and recognition of the broader ecosystem and regulatory framework in RI in order to move the ball forward.

▲

Page 30: [207] Commented [CJ158R3]

Craig Johnson

8/21/2024 9:46:00 PM

I think its less about market readiness and more about driving the market through EE programs. The same could be said about lighting back in the day where there were questions about market readiness for transition from CFL to LED, but the programs were able to drive market change there.

▲

Page 30: [208] Commented [RIE158R2]

RI Energy

6/5/2024 1:28:00 PM

We are starting with the 3YP numbers which already include reductions. We continue to assess the market to determine what levels are appropriate. We are open to any analysis that shows evidence of market readiness for a phase out.

▲

Page 30: [209] Commented [GR159]

Glenn Reed

6/11/2024 8:56:00 AM

Consider also offering a tiered incentive for HPWHs. ENERGY STAR is at 3.30 UEF, while there are models with efficiencies at 4.05 UEF. Adopting one of the Advanced Water Heater Specification tiers might be an easy way to do this.

▲

Page 30: [210] Commented [RIE159R4]

RI Energy

9/3/2024 5:05:00 PM

We will consider but not among priorities for 2025 plan.

▲

Page 30: [211] Commented [SC160]

Steven Chybowski

4/23/2024 9:28:00 AM

Supportive of this, assuming tiered means increased increasing incentive offerings over the baseline incentives offered today

▲

Page 30: [212] Commented [RIE160R2]

RI Energy

6/5/2024 1:28:00 PM

The plan is to increase our baseline efficiency requirement to EnergyStar 6.1 starting in 2025. We would also offer an enhanced incentive for products meeting CEE requirements, which is necessary for the Fed Tax Credit.

▲

Page 30: [213] Commented [RIE162R2]

RI Energy

8/2/2024 2:03:00 PM

RIE will take this into consideration next year as we adopt a two-tier approach

▲

Page 30: [214] Commented [RF162]

Richard Faesy

6/12/2024 5:23:00 PM

This is good, but can you develop a Qualified Products List that include only heat pumps that are also eligible for the federal tax credit so that customers aren't disappointed that the heat pump that is incentivized isn't also eligible for a tax credit?

▲

Page 30: [215] Commented [RIE165R2]

RI Energy

8/2/2024 2:04:00 PM

Heat pump standards here refers to both

▲

Page 30: [216] Commented [GR166]

Glenn Reed

6/11/2024 8:58:00 AM

Are participating contractor requirements the same? Are the OER and RIE contractor lists the same?

▲

Page 30: [217] Commented [RIE166R5]

RI Energy

9/5/2024 6:04:00 PM

Glenn; I'm not sure RIE and OER need identical contractor lists, but we are in discussion as there is significant and increasing overlap between the two organizations.

Richard; see earlier comments on the topic.

▲

Page 30: [218] Commented [RIE166R2]

RI Energy

8/2/2024 2:04:00 PM

No, the contractor lists are not the same

▲

Page 30: [219] Commented [RF166R4]

Richard Faesy

8/21/2024 8:55:00 PM

This might be a good opportunity for RIE and OER to work together on a recognized contractor network, like EVT's.

▲

Page 30: [220] Commented [G166R3]

Glenn Reed

8/19/2024 7:34:00 AM

Should we be working to align these. Can RIE commit to such discussions with OER.

▲

Page 30: [221] Commented [RIE168R2]

RI Energy

8/2/2024 2:05:00 PM

RIE works with with Clean Heat RI to leverage what they are offering. Abode administers CHRI and we have coordinated with them on the customer experience.

▲

Look at the services Abode provides in CT and consider a similar role to help customers navigate heat pumps in RI (or maybe work with OER if better aligned with Clean Heat RI):

Abode's Expanded Responsibilities

- Quarterly Live Training
- Tiered pro-active direct outreach to HPIN
- Office hours and counter days
- HPIN Logo Management
- Engaging Trade schools and unions
- Management of QPL
- Support of non-electrification technologies
- Quality Installation Verification
- Trade Ally Kick off meetings
- Fall heating and cooling conference.
- Connecting HVAC and Wx installers
- Evolving decarbonization consultation
- Quote comparison
- Heat Hump Advocate program
- Salesforce Dashboard
- Work with QAQC Inspection Vendor

If not already included, suggest stressing importance of weatherization and right-sizing.

Weatherization is required for the enhanced rebate, and right-sizing is required for all equipment. These requirements are spelled out in the rebate forms. We also stress the importance of Wx and right sizing in our workforce and contractor trainings.

▲

Page 30: [225] Commented [RIE170R2]	RI Energy	8/2/2024 2:05:00 PM
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Good suggestion - RIE will look to include more on HPWHs in our contractor training.

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Page 30: [226] Commented [GR170]	Glenn Reed	6/11/2024 8:59:00 AM
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Please provide HPWH contractor training in 2025, possibly using training offered through ENERGY STAR's HPWH Manufacturers Action Council (ESMAC)

▲

Page 31: [227] Commented [RIE172R2]	RI Energy	8/1/2024 4:14:00 PM
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Induction cooktops offered in other programs are cost effective when moving from gas cooktop to induction based on GHG savings. An electric cooktop to induction cooktop would have 5-10% energy savings. Premium pricing makes this item not cost effective.

There is one window heat pump that is Energy Star qualified. That item would receive the Room AC incentive if the consumer can find and purchase based on availability. As more items become available, can look into adding into downstream or midstream incentive.

▲

Page 31: [228] Commented [G173R4]	Glenn Reed	8/19/2024 7:39:00 AM
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Please review ENERGY STAR unit shipment data

▲

Page 31: [229] Commented [ML174]	Margie Lynch	6/11/2024 7:01:00 PM
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Please provide rebate levels and efficiency criteria as appropriate.

▲

Page 31: [230] Commented [RIE173R3]	RI Energy	8/1/2024 4:13:00 PM
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Last year we reviewed shelf stocking survey data that showed ES models in RI around 50% for many items. Have provided this information in the past.

Appliance saturation surveys are expensive. Need to look at cost/benefit. If the result is removing products as opposed to adding products, may not be the best use of funding.

▲

Page 31: [231] Commented [CJ173R2]	Craig Johnson	6/28/2024 1:34:00 PM
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See Glenn comment below regarding this.

▲

Page 31: [232] Commented [RF173]	Richard Faesy	6/12/2024 5:28:00 PM
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Can we do a market saturation study and drop the products (like dehumidifiers) that have already been market transformed?

▲

Page 31: [233] Commented [RIE173R5]	RI Energy	9/5/2024 6:04:00 PM
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We discussed the RCP plan earlier in the year on a sector call. ME units were in low supply. It's good to offer ESTAR units that anyone can purchase, so that anyone (renters, non-homeowners) can participate. We used a 2022 study focused on RI, not national data. If you have additional and more recent RI specific data, let us know.

▲

Page 31: [234] Commented [RIE174R4]	RI Energy	9/3/2024 5:05:00 PM
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Measure incentives are in Section 10

▲

Page 31: [235] Commented [RIE174R2]	RI Energy	8/1/2024 4:11:00 PM
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Efficiency levels can be found in the Technical Reference Manual.

▲

Page 31: [236] Commented [RIE176R2]	RI Energy	8/1/2024 4:11:00 PM
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Please see shelf stocking information. Shipments and availability in RI do not always align. Much lower ES shipment rates.

▲

Page 31: [237] Commented [GR176]	Glenn Reed	6/11/2024 9:09:00 AM
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Given 2022 ENERGY STAR market shares, continued support at the ENERGY STAR level is probably not be justified for electric dryers (46%), gas dryers (56%), dehumidifiers (90%), and room air cleaners (86%). There is a new RAC spec, so that product may be less of a concern.

▲

Page 31: [238] Commented [RIE178R2]	RI Energy	8/1/2024 4:10:00 PM
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Air Cleaners are available. Freezers haven't passed screening in the past, but RIE can revisit

▲

Page 31: [239] Commented [GR178]	Glenn Reed	6/11/2024 9:11:00 AM
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Consider adding freezers and room air cleaners

▲

Page 31: [240] Commented [GR179]

Glenn Reed

6/11/2024 9:10:00 AM

There are now ENERGY STAR specs for pool pumps. Please review and consider for adoption

▲

Page 31: [241] Commented [RIE179R2]

RI Energy

8/1/2024 4:10:00 PM

RIE offers Energy Star pool pumps through midstream channel.

▲

Page 31: [242] Commented [RIE180R2]

RI Energy

8/2/2024 2:07:00 PM

Customer can either apply for a rebate using our online portal hosted by RIE's rebate processing vendor or apply through paper submission and mail in. RIE has explored instant rebates but quite costly due to retail store cost to manage

▲

Page 31: [243] Commented [ML180]

Margie Lynch

6/11/2024 7:03:00 PM

Other than the Marketplace, how do customers obtain their rebates? Is there any opportunity to simplify for the customer? e.g.. instant rebates, other use of technology

▲

Page 33: [244] Commented [RIE184R2]

RI Energy

6/5/2024 1:31:00 PM

This would only be applicable to Dehumidifiers, (RIE doesn't offer rebates on Fridge or Freezer other than Most Efficient which isn't feasible thru upstream channel). Dehumidifiers generally do well without enhanced incentive while dropping off units, but we will certainly take it under consideration.

▲

Page 33: [245] Commented [CJ184]

Craig Johnson

4/26/2024 2:47:00 PM

Could we explore adding some sort of enhanced incentive to a customer that recycles a primary piece of equipment eligible in the appliance recycling program and then purchases an efficient one, or vice versa?

▲

Page 33: [246] Commented [RIE185R2]

RI Energy

6/5/2024 1:30:00 PM

One example re: increasing awareness is that RIE installed large A-Frame POP (point of purchase) in all the HD & Lowe's stores across RI region promoting Most Efficient products. Appliance recycling should resume in Fall 2024.

▲

Page 33: [247] Commented [SC185]

Steven Chybowski

4/23/2024 9:34:00 AM

Just flagging that I would like to learn more about these programs and the discussions around increasing awareness

Page 33: [248] Commented [SA187]

Susan AnderBois

4/11/2024 2:27:00 PM

Let's spell acronyms before using them

Page 33: [249] Commented [GR188]

Glenn Reed

6/11/2024 9:20:00 AM

Yes, good. To the comments above on 2022 ENERGY STAR market share, RIE should be making changes for 2025 for several products, including ceasing support at the ENERGY STAR level.

Page 33: [250] Commented [G188R3]

Glenn Reed

8/19/2024 7:46:00 AM

Yes, but, for example, the market share for ES dehumidifiers was 90% in 2022. Why do we continue to support dehumidifiers at this level? And room air cleaner market share was 86%

Page 33: [251] Commented [RIE188R2]

RI Energy

8/1/2024 4:07:00 PM

Most Efficient appliances are in short supply at retail. Earlier in the year we all agreed ES was suitable to offer lower cost product to hit multiple sectors

Page 34: [252] Commented [RIE191R2]

RI Energy

8/2/2024 2:09:00 PM

All electric homes are part of our training. Language edited.

Page 34: [253] Commented [RF192R3]

Richard Faesy

8/21/2024 9:06:00 PM

Nick Jones at Eversource has been doing a great job with trainings for Passive House and other topics that pull in a lot of designers, builders and others. These and other similar trainings could just as well be multi-state. It might be cost-savings to everyone to coordinate and co-promote.

Page 34: [254] Commented [RF192]

Richard Faesy

6/12/2024 5:36:00 PM

Has there been a recent study to determine compliance rates to adopted code?

Page 34: [255] Commented [RIE192R2] RI Energy 8/2/2024 2:10:00 PM

No - we are planning to do another one once the IECC 2024 has been reflected in construction, likely 2026

Page 34: [256] Commented [RIE192R4] RI Energy 9/5/2024 6:06:00 PM

Thank you for letting us know, that's a helpful specific idea.

Page 34: [257] Commented [RIE193R2] RI Energy 8/2/2024 2:12:00 PM

Good suggestions. Our training curriculum is focused on RI but the trainers are familiar with practices in other states.

Page 34: [258] Commented [RF193] Richard Faesy 6/12/2024 5:37:00 PM

Are you collaborating with the trainings and support by MA and CT? Seems like a collaboration opportunity.

Page 34: [259] Formatted Kathryn Cleary 7/17/2024 3:43:00 PM

Indent: Left: 0.5", Space Before: 0 pt, After: 0 pt, No bullets or numbering

Page 34: [260] Commented [RIE194R2] RI Energy 9/5/2024 6:07:00 PM

Potentially. We will be assessing the implications of IECC 2024 and any necessary changes to the RNC program.

Page 34: [261] Commented [G194] Glenn Reed 8/19/2024 7:50:00 AM

Will these savings % need to be adjusted when IECC 2024 goes into effect?

Page 34: [262] Commented [RF195] Richard Faesy 6/12/2024 5:39:00 PM

Is this really enough to transform the RNC market? Look at the incentives in MA and CT for comparison.

Page 34: [263] Commented [RIE195R2] RI Energy 8/2/2024 2:13:00 PM

We do commit below to increasing the incentive for this and other items, see 7.4.

Comparisons of RI to MA and CT should take into account the differences in laws, regulations, regulators, and Benefit-Cost methodologies.

Page 34: [264] Commented [ML196]

Margie Lynch

6/11/2024 7:10:00 PM

This doesn't seem adequate to cover certification cost

Page 34: [265] Commented [RIE196R2]

RI Energy

8/2/2024 2:14:00 PM

There is no certification cost for EnergyStar and RIE offers free training and verification for EnergyStar

Page 34: [266] Commented [G197R3]

Glenn Reed

8/19/2024 7:54:00 AM

But while DOE ZERH is important for tax credits, it is not stringent enough given impending adoption of IECC 2024 adoption

Page 34: [267] Commented [RIE197R2]

RI Energy

8/2/2024 2:14:00 PM

RIE will look to align with DOE's program as it evolves for RI.

Page 34: [268] Commented [GR197]

Glenn Reed

6/12/2024 6:50:00 AM

The first tier of the Path to Zero Energy Ready Home is a DOE ZERH, which is currently HERS 55 for RI. This should be revisited and likely increased. Maybe DOE will once IECC goes into affect in RI.

Though maintaining ties to DOE ZERH will be needed to allow builder qualification for the \$5,000 IRA tax credit, which needs to be discussed in this section

Page 35: [269] Commented [RF199R3]

Richard Faesy

8/21/2024 9:13:00 PM

While I have not seen different incentives for IE RNC projects, there are many RNC programs that provide additional technical assistance and support to affordable projects that are looking to earn QAP (qualified allocation plans) credits for low-income housing tax credits. The CT RNC program has been very successful at driving affordable housing projects to the RNC program by having the funders award QAPs for qualifying projects. Nick Jones at Eversource could provide more information.

Page 35: [270] Commented [RIE199R4] RI Energy 9/5/2024 6:08:00 PM

OK, thank you. We will keep it on the radar and try to learn more to see if it could work here.

Page 35: [271] Commented [RF200R3] Richard Faesy 8/21/2024 9:13:00 PM

How about regular training and TA support too?

Page 35: [272] Commented [GR200] Glenn Reed 6/12/2024 7:10:00 AM

Speak more to PH, particularly for MF. MA has made huge gains in the MF NC market with PH.

Page 35: [273] Commented [RIE200R2] RI Energy 8/2/2024 2:22:00 PM

RIE is increasing incentives for PH (see 7.4)

Page 35: [274] Commented [RIE200R4] RI Energy 9/3/2024 5:07:00 PM

We offer PH expertise as part of our regular training and TA support.

Page 35: [275] Commented [RIE201R2] RI Energy 8/2/2024 2:23:00 PM

This is how it currently works. The text here refers to enrollment, but before that happens, this outreach does occur.

Page 35: [276] Commented [RF201R4] Richard Faesy 8/21/2024 9:15:00 PM

Agreed. It would be good to speak to the whole process including outreach, engagement and recruitment.

Page 35: [277] Commented [RIE201R5] RI Energy 9/5/2024 12:58:00 PM

We can expand on this in the future but we would urge you to remember this is a regulatory document for the PUC, read by a small handful of people.

Page 35: [278] Commented [RF201] Richard Faesy 6/12/2024 5:42:00 PM

Shouldn't the process begin by reaching out to the construction industry to train and educate on the program, build relationships and generate leads?

▲

Page 35: [279] Commented [CJ203R4] **Craig Johnson** **8/21/2024 9:57:00 PM**

Can the Plan speak to these a bit more here (and/or point to other parts of the Plan where this is discussed)?

▲

Page 35: [280] Commented [RIE203R6] **RI Energy** **9/5/2024 12:59:00 PM**

To be clear, every RNC electric project is all electric. Furthermore it's incorporated into trainings, and we have bonus incentives for it. We are doing a lot of all electric. Not everyone wants all electric.

Richard, as it relates to all electric MF, please let us know how others handle it, because to our knowledge it is challenging in particular with DHW. I believe MA has a carve out for that. If you can come up with specifics that would be cost effective in RI, let us know.

▲

Page 35: [281] Commented [RF203R5] **Richard Faesy** **8/21/2024 9:17:00 PM**

Passive House is not necessarily all-electric. Most of the MF projects has gas water heating. What can we do to support more all-electric projects and help guide MF projects to all-electric.

▲

Page 35: [282] Commented [ML204] **Margie Lynch** **6/11/2024 7:07:00 PM**

Please provide examples of what specifically will be pursued in 2025.

▲

Page 35: [283] Commented [CJ203R2] **Craig Johnson** **6/28/2024 1:41:00 PM**

Not only a missed opportunity, but creates growing issues with long term needs to move off the gas system.

▲

Page 35: [284] Commented [RIE204R2] **RI Energy** **8/2/2024 2:24:00 PM**

Please see 7.4 regarding the partnership with RI housing and increased incentives for zero net energy certification and passive house

▲

Page 35: [285] Commented [RIE204R4] **RI Energy** **9/5/2024 1:00:00 PM**

Every RNC electric project is all electric, and we have bonus incentives for all electric.

▲

Page 35: [286] Commented [RF204R3]	Richard Faesy	8/21/2024 9:17:00 PM
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Please add all-electric to this list too. Thanks.

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Page 35: [287] Commented [GR203]	Glenn Reed	6/12/2024 6:53:00 AM
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The RNC discussion needs to be much more all-electric focused. Each fossil fuel home built in RI is a huge missed opportunity.

▲

Page 35: [288] Commented [RIE203R3]	RI Energy	8/1/2024 4:02:00 PM
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We offer comprehensive training for market participants on passive house and other forms of all electric construction.

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Page 36: [289] Commented [RF205R3]	Richard Faesy	8/21/2024 9:28:00 PM
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Are you able to get manufactured homes to be built to program standards? There has been some good work done that can be referenced at <https://vermodhomes.com/> and <https://www.mass.gov/info-details/zero-energy-modular-affordable-housing-initiative>.

▲

Page 36: [290] Commented [RIE205R4]	RI Energy	9/5/2024 1:00:00 PM
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Manufactured homes go through the program and fall into Code Plus through Tier 3.

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Page 36: [291] Commented [RIE205R2]	RI Energy	8/2/2024 2:25:00 PM
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We will provide information on EVSE and PV in program materials. See 7.4.

We continually updates training to reflect changes in the industry such as MF DOE ZERH requirements.

RIE works with manufactured homes.

▲

Page 36: [292] Commented [RIE206R2]	RI Energy	8/2/2024 2:25:00 PM
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RIE will raise awareness of these programs through trainings

We will look to include information on PV, EVSE, and battery programs. See 7.4.

▲

Page 36: [293] Commented [RF206]

Richard Faesy

6/12/2024 6:06:00 PM

How about integration with the state's solar PV and battery programs? What about EV chargers?

▲

Page 36: [294] Commented [CJ208R3]

Craig Johnson

6/28/2024 1:48:00 PM

Can you please elaborate and/or share the results of the research on redesign?

And how are we defining the programs as doing well? Electric RNC has finished short of goal each of the last 4 years, and has finished below 50% of goal each of the past 2 years. With exception of 2022, gas RNC has fallen below goal each of last 5 years.

▲

Page 36: [295] Commented [RIE207R5]

RI Energy

8/1/2024 4:00:00 PM

Our work and training includes all-electric new construction. Regarding "broad consensus amongst stakeholders..." - that is in conflict with where the Future of Gas proceeding stands, since there are scenarios in which some form of the gas system exists while meeting AoC Please refer to the FoG section of the plan.

▲

Page 36: [296] Commented [RIE207R2]

RI Energy

6/5/2024 1:32:00 PM

We are starting with the 3YP numbers which already include reductions and discuss our views on recent market conditions. We continue to assess the market to determine what levels are appropriate. We are open to any analysis that shows evidence of market readiness for a phase out.

▲

Page 36: [297] Commented [CJ207R4]

Craig Johnson

6/28/2024 1:44:00 PM

The Company's programs can help be a driver of market transformation and readiness. The programs don't simply need to wait for that to happen. There is broad consensus amongst stakeholders that there is no future where the state can meet its AoC mandates with continued use of natural gas.

▲

Page 36: [298] Commented [RIE208R5]

RI Energy

8/1/2024 4:00:00 PM

Regarding program redesign:

The modeling we did indicated some promise for a P4P model. However, much more work would be required to investigate it further, flesh it out, get stakeholder (builder) feedback, etc. It's also worth noting that Mass. just switched (in mid 2024) from their P4P model back to a tiered approach (which is what we have now).

We are prioritizing other things at this time. Full redesign of the RNC program will require significant resources, time, and energy to think through and execute well. Given the new code, we will revisit a redesign in conjunction with changes based on the new code, which as I understand it would be in 1-2 years (new code goes into effect end of this year, then we need 1 full year of data in order to do a study). We have many commitments in this RNC section alone, and many more across the Resi and IE programs, and in our equity section.

In short – we will revisit program re-design options in conjunction with the new code changes and impacts.

▲

Page 36: [299] Commented [RIE208R2]

RI Energy

6/5/2024 1:32:00 PM

We did explore some program redesign options, but they did not indicate any significant benefits to changing the existing model. At the moment the RNC program is performing well and we want to focus on attention on key issues such as DF / Justification / Cost of Supply, in particular on programs that have a negative cost of supply. Lastly we have identified several improvements here that will help further an already strong RNC program.

▲

Page 36: [300] Commented [CJ208]

Craig Johnson

4/26/2024 2:52:00 PM

Commitment in 2024 Plan to research program redesign options, including P4P. I would expect that the outcomes of that research would be reflected in the 2025 Plan.

▲

Page 36: [301] Commented [RF207R3]

Richard Faesy

6/12/2024 5:44:00 PM

Agree with Craig. It's time to move towards all-electric.

▲

Page 36: [302] Commented [RIE208R4]

RI Energy

8/1/2024 3:59:00 PM

The program performs well based on cost effectiveness and 2025 projections, and also with the CoCOES lens of the PUC.

Historical difficulties cited over the last 2-4 years can be explained through a few factors:

- 1) RI is dead last in new housing per capita in the USA
- 2) New Construction has long time cycles from enrollment to project completion. It is unique in this regard and much different than all our other programs (the extreme opposite example would be RCP).

Many projects last longer than 1 year, which makes estimating numbers year by year challenging. In addition to the long time it takes to complete a new construction project in general, they can face delays and issues which extend that further and pose uncertainty for timing.

- 3) COVID impacted and complicated everything for everyone. RNC was one example of that.

▲

Page 36: [303] Commented [RIE209R4] RI Energy 9/5/2024 1:01:00 PM

Richard mentioned this above. It would be really helpful to us if comments on a particular topic were in one area.

▲

Page 36: [304] Commented [G209R3] Glenn Reed 8/19/2024 8:01:00 AM

But what about enhanced incentives for affordable housing?

▲

Page 36: [305] Commented [GR210] Glenn Reed 6/12/2024 6:54:00 AM

Zero Energy, or Net Zero Energy? Probably the latter. But this right up should discuss renewable integration.

▲

Page 36: [306] Commented [RIE211R2] RI Energy 8/2/2024 2:28:00 PM

Compared to the current code in RI, HERS 55 is a significant improvement. This is one of several options and pathways RIE provides to meet the market.

▲

Page 36: [307] Commented [G211R3] Glenn Reed 8/19/2024 8:03:00 AM

But this should not be the first tier in Path to Zero Energy. Too low a bar

▲

Page 36: [308] Commented [GR211] Glenn Reed 6/12/2024 6:55:00 AM

But HERS 55 for SF homes is probably not good enough.

▲

Page 36: [309] Commented [RIE211R4] RI Energy 9/5/2024 1:03:00 PM

We would disagree that a significant improvement relative to code is “too low a bar” for the first of several tiers in a new construction program. Furthermore, by setting a first tier bar too high, you run the risk of no participation and therefore code, thus backfiring on you.

The program has 4 tiers for both renovation and new construction. We have additional incentives for PH, ZNE, and all electric.

If you have a specific argument to make about what the entry level tier should be, and why, let us know. Otherwise we think it makes sense to offer a variety of options and let builders and consumers choose what makes sense for them and their situation.

Page 39: [310] Commented [RIE216R2]

RI Energy

9/5/2024 1:05:00 PM

There are a number of equity initiatives that receive targeted marketing, outreach and resources. There was a participant / non-participant study done recently. I believe marketing in general is by definition designed to target non-participants to become participants.

Equity work by definition is centered on outreach and work with “targeted customer segments”

If you listen to the PUC hearings, they have different opinions on what equity means and in particular concerns about SBC funds not being broadly marketed to all customers. So it can be a balancing act.

I’d also encourage you to look at the ‘market potential’ of the Income Eligible sector from the study the C Team led and then reconcile that with the Act on Climate and necessary GHG reduction goals.