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2025 Commercial & Industrial
Energy Efficiency Solutions and Programs

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1. OVERVIEW

Commented [DM1]: It would be very helpful to have a table in the Overview showing total 2025 C&I savings (annual, lifetime) and spending by program.

Commented [RIE1R2]: Noted. This information is provided in Attachments 5 and 6.

The primary objective of the Company's Commercial and Industrial (C&I) programs is to drive the implementation of energy efficiency projects that minimize or reduce energy consumption and help Rhode Island businesses, industries, institutions, and government agencies save on their utility bills. Energy efficiency programs also help C&I customers reduce their operations and maintenance (O&M) costs, meet corporate sustainability goals, improve indoor air quality, and protect the environment by reducing greenhouse gas emissions and other air pollutants. The Company's C&I programs offer incentives, rebates, financing, and technical assistance to customers across the state who want to save money and reduce their building's overall energy consumption footprint.

The Company continuously evaluates customer needs and market dynamics to determine if program adjustments and enhancements are warranted and to drive market transformation across multiple end uses. This retrospection allows the Company to develop and evolve program design and efficacy, determine the value and potential of energy efficiency, and secure comprehensive energy savings.

Commented [j2]: This sounds good; it would be very helpful to understand what this continuous evaluation process entails and hear some examples of changes they've made as a result.

Commented [RIE2R2]: Recommendations from process evaluations are one such example. In addition, reducing the number of pathways for the New Construction Program simplifies the participation process for customers and key stakeholders (vendors, engineers and architects). Another example is the Summer Steam Trap initiative which better leverages the steam trap vendors during the summer to deliver services (and savings) to customers that use steam only for heating purposes.

The state's C&I sector is diverse and complex; therefore, the Company has designed its energy efficiency programs to offer tailored solutions addressing the different subsectors and varying efficiency needs of building types and uses. Over the last decade, the Company has focused on a market sector approach for C&I customers. A customer's efficiency needs are shaped by the strategic and commercial pressures specific to their market sector, industry or communities served. Some C&I customers may need to improve the efficiency of their factory operations to maintain their competitive niche while others need to improve the comfort of customers through the installation of high efficiency heating, cooling, and ventilation (HVAC) systems. The Company offers a wide variety of customized solutions to empower customers to determine what energy efficiency measures or programs are the best fit for their needs. This process engages the C&I customer and often leads to more comprehensive projects with multiple energy efficiency measures.

Large C&I customers' facilities provide ~~are~~ the greatest opportunities for cost-effective savings. The Company operates its C&I programs primarily through an account management approach where each account manager focuses on one or more industry vertical or market sector. By focusing on specific market sectors, the Company's account manager can identify the correct vertical initiatives (e.g., Grocery, Restaurant, Industry) that are supported by implementation vendors or through large-scale agreements, such as the Strategic Energy Management Partnerships. These vertical initiatives enable the Company to tailor offerings to meet the specific needs of customers, identify and apply project learnings to customers in similar market sectors and facilities, and engage customers in energy efficiency. This custom-tailored approach drives program participation and establishes a trusted relationship between the Company and customers.

Commented [j3]: This is an odd lead in sentence. And that is at the site level. "Offer" instead of "are" would also improve the sentence. Because the programs have historically pursued ops at the largest sites, is this still true?

Commented [RIE3R2]: Corrected the sentence. Also, it is still true that our largest customers provide the most savings.

~~Additionally,~~For small business customers, the Company offers a ~~Small Business Direct~~ direct install program providing turnkeyi~~Install p~~~~Program that provid~~inges ~~turn-key~~ services consisting of ~~, program offers~~ audits;~~,~~ reports summarizing the energy efficiency measures, the Company rebates and customer costs; simple, one-page contract; installation services provided by the implementation vendor's electricians; ~~, enhanced incentives,~~ and financing. These services are provided by ~~through~~ the Company's implementation vendor ~~or an alternate vendor of the customer's choice.~~ because these small business customers are often too busy to identify energy efficiency services in their buildings or operations. However, small business customers can choose to use their own vendor but most vendors are not focused on delivering energy efficiency services to smaller businesses because of the relatively small project sizes. The installation of energy efficiency measures helps lower customers' energy bills while improving the ambiance, comfort and operations of the establishment.

The Company designed ~~its~~ ~~Up~~the Midstream ~~Program~~ channel to help all C&I customers, regardless of size, purchase qualifying high efficiency HVAC, hot water, lighting, and commercial kitchen equipment. This ~~e~~ ~~program~~ channel subsidizes measures to encourage distributors to stock, promote and sell high efficiency equipment.

This attachment provides detailed descriptions regarding the Company's C&I programs and how the Company plans to transform the 2025 Annual Plan's high-level goals and strategies into specific, concrete actions and activities for each C&I program. The Company provides these details for stakeholders, regulators and other interested parties so they can see the complex framework needed to integrate program implementation, incentive design, new standards and emerging technologies into flexible, innovative programs tailored to specific customer and building types.

1.~~2~~1 What to Look for in 2025

In 2025, the Company will make several enhancements to existing program offerings to increase participation and drive non-lighting savings. These enhancements include augmenting customer engagement and marketing strategies, adding new HVAC and Food Service measures to the ~~upstream~~ midstream ~~program~~initiative, refining the Building Analytics Program, continuing to promote and ramp up the Energy Management System participation, and to partner with community organizations that can help to drive participation with the Small Business Main Street campaigns. In 2025, the Company plans to implement the following strategies:

- Deploy a data-driven approach to increasing customer participation in the C&I sector
  - Utilizing Energy Profiler Online to look at scheduling inefficiencies
  - ~~Leveraging and improving on data from past Market Saturation Studies~~
  - Leveraging data from past Market Saturation Studies to identify market segments that historically have participated than other customer segments and use the data to identify end-uses where the Company needs to improve delivery
  - Target specific offerings based on technology fit and customers energy consumption
- ~~Deploy a data-driven approach to increasing customer participation in the C&I sector by analyzing customer consumption data (e.g., kilowatt-hours, therms, load distribution, and peak load) and past energy efficiency participation to better target customers, especially nonparticipants~~
- Analyzing consumption data (e.g. kilowatt-hours, therms, load distribution, and peak load) to better understand energy efficiency opportunities, especially amongst non-participants
- Utilize past energy efficiency participation data to better target customers and drive repeat engagement

Commented [j4]: In MA we are pushing the PAs to segment the small biz sector by industry instead of segmenting medium/large by industry and lumping all smalls together. Small business is not a market sector (heading of this section)

Commented [RIE4R2]: Some small business customers are already segmented by industry (restaurants, schools) when the measures found in these businesses differ from business customers with a more "boilerplate" list of measures (day care centers, barbershop).

I believe we have focused on grouping businesses based on end uses so that the vendor delivering services can provide cost-effective installation services (e.g. buying equipment in quantity) at scale.

Will be good to track the progress in MA to see if this delivers greater savings at lower quantities.

Finally, 2023 data showed that 7 out of 10 participants use less than 100,000 kWh per year ("micro-businesses") ... [11]

Commented [DM5]: The Plan refers to both upstream and midstream, interchangeably. The Company shou ... [12]

Commented [RIE5R2]: Good catch. Correction made.

Commented [j6]: Also not relevant to mkt sectors

Commented [RIE6R2]: We deleted the Section header and have this under "Overview" header.

Commented [j7]: Should probably move this to the introduction section

Commented [RIE7R2]: Now part of the OVERVIEW section after the "Market Sector" header is deleted.

Commented [j8]: Is there also an intent to expand this offering? If so, that could be included here.

Commented [RIE8R2]: At this point, most of the known refinement around BAP center on marketing to custo ... [13]

Commented [DM9]: Can you elaborate here? Improve what and how?

Commented [RIE9R2]: We have changed the text to provide additional details.

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Commented [DM10]: This is confusing, since the sentence describes using past energy efficiency ... [14]

Commented [RIE10R2]: Agreed. We have separated into two bullet points.

Business Use

  - Utilizing past Market Saturation analysis to determine which customers to target and how best to engage with specific underserved customer/market sectors
- Developing additional marketing and outreach strategies, including targeted webinars for specific technologies and market sectors, the deployment of marketing case studies utilizing Rhode Island customers, and leveraging participation data to focus on underserved customers
- Support more advanced system controls, energy management systems and building analytics through retro-commissioning, monitoring-based commissioning, equipment right sizing
  - Continued refinement of the Building Analytics Program and Energy Management System offering
- Continued deployment of the custom and prescriptive weatherization tools
- Eexpansion of Small Business measures ~~such as~~ including smart power strips and energy efficient hand dryers to achieve greater savings
- Inclusion of a Trade Ally Engagement Specialist to better engage trade allies (e.g. contractors) with expertise in HVAC, controls, refrigeration and other non-lighting technologies
  - Build relationships with contractors and commissioning firms, lead workforce and training efforts, educate on energy efficiency incentives, and ~~breakdown~~ address barriers to participation

The implementation of these strategies will support continued innovation and accelerate the efficiency of Rhode Island businesses, industries, institutions and government agencies. These actions and activities support the key strategic priorities set out in the 2024-2026 Three-Year Plan, including increased customer outreach, programs delivered equitably, enhanced financing options, increased workforce capacity building, and targeted comprehensive efficiency upgrades to increase program participation. These strategies and planned activities reflect ideas and insights identified by the Company in collaboration with the Energy Efficiency Council (EEC) and its consulting team, the Office of Energy Resources (OER), and the Division of Public Utilities and Carriers (the Division), as well as customers, program vendors, and trade allies.

The Rhode Island Mercury Reduction and Education Act[1] ~~mercury ban legislation~~ for linear fluorescent products becomes effective on January 1, 2025 and measure lives for LED fixtures rebated through the Retrofit Program and Small Business Program were reduced by approximately 50%. Savings for these projects are still being claimed in 2025 because the Company's rebates through these two programs accelerated the replacement of existing fluorescent fixtures with LED fixtures. In addition, the Retrofit Program midstream delivery channel will no longer claim savings for "replace on failure" projects – estimated to be 29% of the midstream delivery channel sales – because the legislation prohibits the sale of fluorescent lamps.

[1] https://webserver.rilegislature.gov/BillText/BillText23/SenateText23/S1119.pdf

Commented [j11]: Really like this. Suggest also including tracking approaches to engagement and customer responses to help identify what is working well and which approaches aren't delivering the expected results.

Commented [RIE11R2]: Thanks, Jen! Yes, we agree on the customer engagement tracking as well. Perhaps we can discuss in more detail during a Cteam call. Thank you.

Commented [DM12]: Target based on sector and/or end-use? Typically these studies are performed at a market sector or end-use level. Individual customers are anonymized.

Commented [RIE12R2]: Both! While the market sector data (re: NAICS) is somewhat less reliable, we are able to breakout specific customers (at least for the larger accounts). Bringing this information together is especially helpful in determine engagement strategies.

Commented [AC13]: We should plan to discuss at sector team calls or TWG meetings. These seem like good strategies

Commented [RIE13R2]: Sounds good.

Commented [j14]: I'm liking these innovations. It would be helpful to understand how they plan to assess effectiveness and learn from failures or continue to improve approaches that show promise.

Commented [RIE14R2]: Yes, something we can address in the C&I Sector calls. For example, we have made some modifications to the webinar series after the first webinar so that each webinar attendee will be contacted for follow up after the webinar. Similarly, the webinar introduc ... [15]

Commented [AC15]: Seems like these should be s ... [16]

Commented [RIE15R2]: Done! Thank you!

Commented [AC16]: Good. I know the WFD sectio ... [17]

Commented [RIE16R2]: There is definitely overla ... [18]

Commented [j17]: Good addition!

Commented [DM17R2]: I agree! Will this be an in ... [20]

Commented [RIE17R3]: We have not yet decided ... [19]

Commented [j18]: Suggest including commissioni ... [22]

Commented [RIE18R2]: Good catch. Added ... [21]

Commented [DM19]: "Mercury Reduction And Ed ... [23]

Commented [RIE19R2]: Thank you.

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Commented [DM20]: For linear fluorescent products

Commented [RIE20R2]: Added.

~~A top priority for t~~The Company ~~is~~ continues to develop an equity-driven approach to the ~~design,~~ implementation and marketing of C&I programs. To help ensure programs are delivered equitably to C&I customers across the state, the Company will work with its Small Business implementation vendor to have ~~hire~~ multilingual small business auditors on staff or available, have a language line available to small business customers calling the implementation vendor, have Evaluation studies conduct participant surveys in multiple languages, ~~promote equitable hiring practices through vendor agreements,~~ and continue to focus on reaching small C&I customers ("micro-businesses") while also engaging with organizations supporting minority-owned businesses to raise awareness of the Small Business Program.~~, with a specific focus on woman and minority-owned enterprises.~~

Commented [AC21]: It would be meaningful to include regular updates on these commitments in EWG discussion and in quarterly reports

Commented [RIE21R2]: Will do.

1.~~3~~2 Commercial & Industrial Programs

In 2025, the Company will implement four C&I energy efficiency programs as shown in Table 1~~Table 1~~, below.[2] These programs are designed to serve a number of different market sectors, customers and building types.

Table 1. Commercial and Industrial Programs

Large Commercial and Industrial New Construction
Large Commercial Retrofit
Small Business Direct Install
C&I Multifamily Program

All C&I customers are eligible to participate in the Large Commercial and Industrial New Construction Program (New Construction Program) and Large Commercial Retrofit Program (Retrofit Program). However, eligibility for the Small Business Program is limited to customers that consume less than 1.5 million kilowatt-hours (kWh) per year. In cases where a small C&I customer's project demands larger or more complex efficiency measures than offered through the Small Business Program, the customer can participate in the New Construction Program or Retrofit Program. Table 2~~Table 2~~ provides a summary of the programs.

Commented [j22]: Is the customer's participation in these other offerings facilitated in any way?

Commented [RIE22R2]: Yes, Small Business vendor supports and facilitates the customer's participation in the NC/RETROFIT Program.

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Table 2. 2025 Commercial and Industrial Programs

[2] 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.

Program Name	Program Description
Large Commercial and Industrial New Construction and Building Energy Code Support *Funded by Electric and Natural Gas*	The New Construction Program offers financial incentives and technical assistance to customers, design professionals, developers, and vendors to encourage energy efficiency in new construction, major renovation, planned replacement of aging equipment, and replacement of failed equipment projects. Through the program, design professionals are eligible to receive technical assistance to conduct energy modeling and analysis for new construction projects. Owner's design teams are offered incentives for their time and effort to meet program requirements. The program promotes and incentivizes the installation of high efficiency equipment in existing facilities during remodeling projects or for equipment failure and replacement. Since customers are more likely to install energy-efficient equipment at the time of construction or equipment replacement, the program offers incentives to ensure customers make the investment immediately rather than doing so at a greater cost later. The program also offers operations verification or quality assurance services to ensure that installed equipment and systems operate as intended. The program supports the State's Zero Energy Building goals through engagement and in developing future offerings. The program promotes compliance with the building energy code and increasing the use of the Stretch Code to support the State's goals and objectives. Technical assistance is provided for advancing the development and adoption of minimum efficiency standards for appliances and equipment.
Large Commercial and Industrial Retrofit *Funded by Electric and Natural Gas*	All commercial, industrial and institutional customers are eligible to participate in the Retrofit Program. The program incentivizes the replacement of existing equipment and systems with high efficiency alternatives such as lighting, HVAC systems, motors, thermal envelope measures and custom measures in existing buildings. Technical assistance is offered to customers to help them identify energy-saving opportunities. The program's incentives help C&I customers in defraying part of the material and labor costs associated with the installation of energy efficiency measures. In addition, the Company offers education and training, such as the Builder Operator Certification training, to support the adoption of energy-efficient equipment and practices.
Small Business Direct Install *Funded by Electric and Natural Gas*	The Small Business Program is a retrofit offering that provides turn-key efficiency solutions to customers who use less than 1.5 million kWh per year. Through the program, a free on-site energy assessment is performed, and customers receive a customized report detailing recommended energy-efficient improvements. From local pizzerias to small convenience stores, the Small Business Program serves mall businesses of all customer types, buildings and sizes. The program pays up to 70 percent of installation and equipment costs. Provided funds are available, customers

Commented [DM23]: Might be worth noting that the up/midstream fall within this program, give the size and impact of these initiatives.

Commented [RIE23R2]: Added separately to Table 2.

Commented [j24]: It's unclear where new and replacement equipment falls is it under retrofit or under new construction?

Commented [RIE24R2]: From above in NEW CONSTRUCTION:

The New Construction Program offers financial incentives and technical assistance to customers, design professionals, developers, and vendors to encourage energy efficiency in new construction, major renovation, **planned replacement of aging equipment**, and **replacement of failed equipment projects.**

Program Name	Program Description
	can finance the remaining costs of the project for up to 60 months (typically 24) interest free on their electric bill using the Small Business Revolving Loan Fund.
Commercial and Industrial Multifamily *Funded by Natural Gas*	The C&I Multifamily Program provides comprehensive efficiency services for market-rate multifamily customers who reside in buildings with 5+ dwelling units. These coordinated services include energy assessments and incentives for weatherization and the replacement of heating and domestic hot water equipment and systems. The program's services are offered for all types of multifamily properties. To streamline the delivery of program services, the Company designates a primary point of contact for the multifamily property who will manage and coordinate the services offered. The measures and services are offered through the Company's existing Energy Efficiency Portfolio of C&I programs (C&I Retrofit) and Residential programs (Energy*Wise*, Income Eligible, Residential New Construction and ENERGY STAR® HVAC).
Midstream Initiative	The Midstream Initiatives are not a separate program offering but rather are included here given their contribution to the savings of the Retrofit and New Construction Program. Midstream Initiatives offer instant discounts to customers for the purchase of qualified, high efficiency products including luminaires, kitchen equipment, water heating equipment and high efficiency heating and cooling technologies at participating distributors. By offering discounts through distributors, the Company eliminates the need for individual customers to submit incentive applications which can be a barrier to participation. The Midstream Initiatives also reduces the cost of energy-efficient products compared to less efficient alternatives and encourages distributors to stock and promote high efficiency products. The Midstream Lighting Initiative's savings and budget are included in the Retrofit Program and the Midstream HVAC and Food Service Initiatives are included in the New Construction Program.

The Company's market sector approach is reflected in the four C&I programs. Within a given program, there are one or more vertical initiatives that are designed to deliver a custom-tailored solution or targeted approach to a particular market sector, customer or building type. The Company defines initiatives as a go-to-market strategy within a C&I program that promotes a subset of energy efficiency

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Commented [DM25]: Would it be possible to produce a matrix showing all programs and initiatives?

Commented [MH25R2]: I agree this would be helpful

Commented [RIE25R3]: Table 2 includes a description of the C&I program and services.

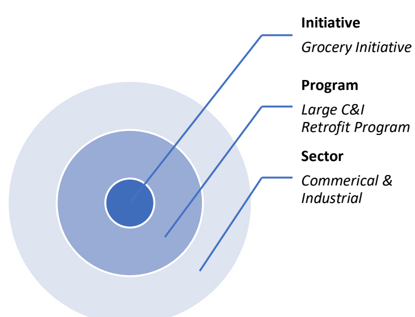
measures or services within the program and targets a certain market segment. For example, the Retrofit Program has a Grocery Initiative and Industrial Initiative that have identified particular market pressures, energy consumption patterns and energy-saving opportunities for these market segments.

These customized initiatives allow the Company to more effectively and efficiently secure savings from target customers. Please note that estimated energy savings, program budgets and participants for each initiative are included in the program-level totals. All initiatives support both electric and natural gas measures, unless otherwise noted or self-evident (i.e., lighting initiatives only cover electric measures).

Figure 1. Relationship between Programs and Initiatives

Commented [MH26]: Doesn't strike me as a particularly valuable graphic

Commented [RIE26R2]: Thanks for the feedback. Suggestions on improving it?



1.43 Program Description Structure

In order to streamline review of program information in the Annual Plan, the Company has adopted the following structure for each of the C&I programs:

a. Description of offering,
b. Eligibility criteria,
c. Delivery,
d. Changes for 2025, and
e. Other considerations/research.

Enabling strategies for increased program participation, improved customer experience and efficient program delivery are detailed in the Financing and Marketing sections. Workforce development is addressed in the main text and in the Cross-Cutting Programs section. A list of measures and incentives can be found at the end of this Attachment. In 2025, the Company plans to continue to engage in pilots, demonstrations, and assessments (see Attachment 8 for a detailed scope and list for each pilot, demonstration, and assessment proposed for the 2025 Annual Plan). Financial mechanisms structures are described in Section 6 and in Table 3~~Table 3~~ below.

Table 3. Financial Mechanisms Structure

Mechanism	Description
Customer Type	This section highlights the customer consumption in kWh or customer type for which the mechanism is best suited
Loan Size	Shows maximum loan size
Maximum Tenor	Shows the maximum length of time (term) for which a customer can borrow funds
Loan Volume	Shows the dollar volume of loans outstanding or the range of funds previously borrowed (or both)
Benefits to Customer	Describes the benefits of a mechanism to a customer
Limitations	Describes the limitations of a mechanism to a customer
2025 Actions	This area is included for the Efficient Buildings Fund and C-PACE (Commercial Property Assessed Clean Energy) as the Company is currently working with the Rhode Island Infrastructure Bank and other stakeholders on integrating these mechanisms
More Information	This area describes where more information can be found regarding the mechanism, such as numerical tables. This area may include additional information such as justifications for On-Bill Refinancing fund injections (natural gas) or On-Bill refinancing rightsizing (electric)
Relevant Notes	This area contains notes and will vary by mechanism

2. Large Commercial and New Construction Program

2.1 Offerings

The New Construction Program offers incentives and technical assistance to promote and support high performance building design, building operation and equipment selection. The incentives and technical services offered are based on the projected energy savings performance of the building and are designed to encourage design teams, building owners and developers to build beyond the current Rhode Island program energy baseline. The technical assistance provided by the program varies from simple plan review and efficiency upgrade recommendations to complete technical blueprint reviews.

Additionally, the program offers incentives to building owners and design teams for Zero Net Energy certification and verification and post-occupancy verification of energy savings.

The program incentivizes both new equipment at existing sites and new construction and major renovation projects. Section 2.2 describes the baselines and eligibility guidelines for new equipment.

In 2025, the Company will conduct a New Construction process evaluations to determine if additional engagement strategies could be instituted to influence and impact the design phase. Additionally, the Company will look to see what efficiencies or process improvements could be incorporated into the program offering to improve participation, and to learn if the program pathways, specifically the Energy Use Intensity/Zero Net Energy Ready pathway could benefit from redesign or simplified approach.

Currently, the Company offers two pathways for ground-up new construction or major renovation projects:

- Pathway 1: Energy Use Intensity / Zero Net Energy Ready
- Pathway 2: Streamlined / Systems

Pathway 1: Energy Use Intensity / Zero Net Energy Ready

This pathway focuses on high efficiency design as well as post-occupancy energy use intensity (EUI). EUI measures the total energy consumption (measured in kBtu) per square foot throughout a whole building. (e.g., a high-efficiency building will have a low EUI, whereas an inefficient building will have a high EUI). This pathway is being made available to buildings 20,000 square feet or greater whose design teams and building owners engage with the Company early in the schematic design and development process. For this pathway, the Company has developed specific EUI targets for several market sectors including libraries, offices, public safety facilities and schools (elementary and high school). The specific EUI targets help to benchmark buildings with similar end-uses, systems, and equipment. For other building types, a site-specific EUI category will be available to ensure that any building type can participate in this pathway.

The Company has established EUI ranges for both Tier 1 and Tier 2 buildings. Tier 1 buildings are designed to achieve higher efficiency and are considered Net Zero Energy Ready, while Tier 2 includes high efficiency buildings that are designed to achieve savings relative to energy code and industry standard practice. By offering a range of EUIs rather than one specific target, the Company can encourage a wider range of building types to participate in Pathway 1. The pathway encourages additional savings by offering higher incentives for buildings that reach below the Tier 1 EUI targets. For example, a building with a Tier 1 EUI target of 30 will receive additional incentives if they realize an EUI of 25.

Commented [j27]: Hopefully the company will also investigate how to move participants to more advanced pathways and how to engage non-participants.

Commented [RIE27R2]: Yes! Both of these strategies are being considered in the New Construction Process Evaluation that's underway!

Commented [AC28]: How are completed projects tracked between each pathway? Historical data does not seem to differentiate with different measure codes or anything

Commented [RIE28R2]: The new RIE system of record should make tracking between Pathway 1 and Pathway 2 more evident.

Commented [j29]: Commissioning, including envelope Cx is very important in high performance buildings. Does the program support/require Cx and if so, how? Also, there is no discussion that I found of the post installation performance verification piece which was a critical part of Pathway 1 program design. Please address.

Commented [RIE29R2]: A key part of our customer commitment is meeting the requirements of ASHRAE 90.1-2016, para. 8.4.3 related to metering and data storage and provide necessary post occupancy data to Rhode Island Energy at the end of an agreed-upon one-year post occupancy period.

Once the building is functioning in a steady state, the customer and Rhode Island Energy agree to begin the Performance Period, which will last for one year. At the end of the Performance Period, the customer is responsible for supplying post occupancy energy usage data for Rhode Island Energy to review.

The Performance Period as it relates to the post occupancy incentive will begin once the customer affirms:
• The metering system is set up and operating properly per ASHRAE 90.1-2016, para. 8.4.3. The system shall be capable of maintaining all data collected for a minimum of 36 months.
• All significant corrective action the customer intends to take has been completed.
• The occupancy and use of the building have reached a "steady state."

Customer shall supply Rhode Island Energy with the following at the end of the Performance Period:
• Final commissioning report, if available.
• Electrical energy usage for the following loads shall be recorded and reported to Rhode Island Energy on at least an hourly, daily, monthly, and annual basis for the one-year period (Exception – up to 10% of the load for each of the following categories (b) through (e) shall be allowed t ... [24]

Business Use

Pathway 1 offers comprehensive technical assistance and financial incentives for Zero Net Energy, Zero Net Energy ready and very low EUI projects. A Zero Net Energy building is an extremely energy-efficient building designed and operated to consume only as much energy as it produces annually. A Zero Net Energy Ready is defined as a building that could offset most or all the buildings annual energy use through a renewable energy system. And, as mentioned above, Energy Use Intensity (EUI) is the total energy use measured in kBtu per a square foot. This pathway offers an optional verification incentive to measure building EUI post occupancy.

Pathway 2: Streamlined/Systems

This pathway is designed for smaller and simpler building designs and offers a variety of incentives and technical assistance services. The offering is available to buildings 20,000 square feet or greater regardless of when the design teams and building owners engage the Company. The program process requirements for this pathway are streamlined from the required documents to the technical assistance procedures. This streamlined offering encourages increased participation for simpler building designs.

Pathway 2 provides incentives based on individual energy-saving measures implemented and the Company utilizes a spreadsheet analysis tool to estimate energy savings and incentives early in the project. This pathway is especially appropriate for major renovation projects, such as tenant fit outs, and for customers who lack the resources or time to pursue an EUI-based approach.

Additionally, prescriptive and ~~upstream~~ midstream rebates for installing energy efficient equipment and measures will be made available to buildings less than 20,000 square feet.

2.2 Large C&I New Construction Initiatives

2.2.1 ~~Upstream~~ Midstream Initiative

When "~~upstream~~midstream" is referenced, the Company is referring to the practice of offering an incentive directly to a manufacturer or distributor of efficient equipment rather than offering an incentive directly to the customer through an application form and process after the sales transaction has been made. This allows manufacturers and distributors to sell the product for a lower price and makes the efficient option more appealing to a potential customer. For customers, the ~~Upstream~~ Midstream Initiative offers them the ability to purchase high efficiency equipment without the burden of paperwork or waiting for reimbursement. The following ~~Upstream~~ Midstream Initiatives are available to all C&I customers.

- **~~Upstream~~ Midstream HVAC Initiative.** This initiative offers discounted premium efficiency HVAC equipment and controls at the point of sale at qualified distributors including air-cooled air conditioning and heat pumps systems, water-cooled air conditioning and heat pumps.

Commented [MH30]: How does RIE define a simpler building design? Some examples here may help distinguish between the 2 pathways

Commented [RIE30R2]: For NC, there is an EUI-based pathway and a non-EUI based pathway. While the company can attempt to influence which pathway a customers selects, often times the customers design concepts is the determining factor. If the customer is not pursuing a Zero Net Energy, low-EUI, or ZNE-ready building, then by default it is a simpler building design and would go through path 2.

Commented [CJ31]: I provided a comment on this front last year asking if it was a Company operated tool, or if it is something that customers can use on their own? I was wondering if a customer facing tool that the Company makes publicly available might be useful.

The response from Daniel Tukey indicated that it was something that the Company could consider during 2024, but that they would like to consider unintended consequences (such as user error that lead to discrepancies in savings or incentive totals).

Raising this again here to see if the Company has given this any thought.

Commented [RIE31R2]: Thanks, Craig. We came to the same conclusion that it's best to not pursue a customer-facing tool, primarily for the same reasons listed above. Even with training, the customer-facing tool would likely result in user error that could result in confusion, unrealistic incentive or energy savings outputs, and general frustration. This could also result in significant back-and-forth between the customer and the vendor/RIE to validate input claims.

Commented [j32]: There are small high performance buildings. Could the plan please clarify how the Company works with projects 20k Sq ft or smaller that are looking to be ZNE ready or at least high performance? We realize the economics may be more challenging for these projec ... [25]

Commented [RIE32R2]: If the customer is interesting in pursuing path 1 projects the Company will work with the customer and design team to meet their building and efficiency objectives.

Commented [j33]: One overarching comment I have is that it would be very helpful for the Plan to explicitly state which program elements/initiatives are delivered by contracted vendors with a brief overview of the vendor scope of services. This applies to all vendor delivered initiatives and/or programs. thanks

Commented [RIE33R2]: The Company is willing to work with the Cteam to develop a vendor scope of services as a working document between the Company and the Cteam.

Business Use

- **~~Upstream~~ Midstream Gas Initiative.** This initiative offers discounted premium efficiency water heating equipment at the point of sale through qualified distributors. In 2025, as in past years, the initiative will include water heaters (indirect and on-demand), water heating boilers and condominium water heaters.
- **~~Upstream~~ Midstream Kitchen Equipment Initiative.** This initiative offers discounted premium efficiency electric and natural gas kitchen equipment at the point of sale at qualified distributors. The Company currently offers more than nine different types of energy-efficient cooking equipment across both fuels.

- **~~Upstream~~ Midstream Lighting Initiative.** This initiative is primarily focused on Retrofit projects and offers discounted luminaires, luminaires with controls, lamps, and controls at the point of sale from qualified distributors.

All ~~Upstream~~ Midstream initiatives follow a similar implementation and delivery process. Distributors sell products directly to consumers or relevant intermediaries and provide discounts at the point of sale. The distributor then submits data on the purchase and the Company pays the incentive to the distributor and conducts quality control visits for a percentage of installations. The Company collaborates with qualified distributors to target market efforts to relevant customers.

Commented [MH34]: Similar to another comment in this document: what is the difference between upstream and downstream? They seem to be used interchangeably throughout?

These all sound like offerings that would fall under what is typically referred to as 'midstream', i.e. incentive goes to a distributor. 'Upstream' could be misunderstood to mean that the incentive is going to a manufacturer.

Commented [AC34R2]: What are the estimated IECC 2024 impacts here? Does it warrant revisiting the upstream offerings?

Commented [RIE34R3]: The text has been changed to include the only "Midstream".

The IECC 2024 was just published last week, RIE is currently evaluating the report to determine the gross savings impacts to measures. The Company will look to share its findings and update gross savings quantities in the Planning Tool after we complete our analysis.

2.2.2 Customer Eligibility

The New Construction Program is divided into two main categories to address new construction target markets:

- **New Buildings, Additions, Major Renovations and Tenant Fit-Ups Pathway**. This category is designed for customers that are pursuing ground up new construction or major renovation projects. These types of projects traditionally involve some level of design and are governed by building and energy codes.
- **New Equipment and End-of-Life Replacements Pathway**. This category is designed for customers that are purchasing new energy consuming equipment or replacing equipment that has reached the end of its useful life. Customers are incentivized to purchase and install energy-efficient equipment. Typically, there is no design component to these projects. Baseline energy use is considered to be the energy code or industry standard practice where applicable and energy savings are calculated using the baseline. If equipment has reached the end of its useful life, this pathway calculates energy savings from new equipment against the current codes and standards baselines (instead of against the old equipment). This pathway works similarly to the "systems approach" described below, whether through prescriptive or custom pathways.

2.2.3 Implementation and Delivery

As referenced in Section 2.1, the New Construction Program offers two pathways for ground-up new construction or major renovation projects. The Company also offers additional enhancements, with the goal of improving the customer experience and in turn driving repeat participation from customers and design teams.

2.2.3.1 Pathway 1: Energy Use Intensity / Zero Net Energy Ready

For Pathway 1, the Company's Energy Efficiency team reaches out to customers, owners and developers regarding new construction project opportunities. Over the years, several customers and design teams have become repeat participants. If the customer decides to participate in energy efficiency programs, the Company's team engages with the customer project design team and facilitates a design charette to establish customer project goals. Based on the project goals, an EUI target range is established, and a Technical Assistance vendor is engaged to model the baseline project and proposed design project.

Zero Net Energy Projects

Commented [j35]: Is this for all Path 1 projects? Please clarify

Commented [RIE35R2]: This is the process for Zero Net Energy projects under Path 1.

The Company's Energy Efficiency team must follow these steps for reviewing all potential Zero Net Energy projects:

- Vet the proposed project to ensure it meets basic New Construction Program requirements.
- Bring in a Zero Net Energy expert to assist the customer in assessing the project and identify services that may be needed to achieve the Zero Net Energy goal.
- Require the customer to engage a Zero Net Energy consultant, with the fee cost shared between the Company and the customer. The Zero Net Energy consultant is engaged from early in the project through the end of design development.
- Ensure the Zero Net Energy consultant provides a number of services including benchmarking EUI targets, conducting an energy charrette, performing load reduction analysis, and running HVAC selection analysis and model feedback.
- Require the customer to sign a Memorandum of Understanding (MOU) that outlines the EUI target, the post-occupancy EUI verification plan and other incentive details.
- Require the customer to sign an application that includes the energy efficiency measures and systems agreed upon. By signing the MOU and application, the customer commits to implementing the efficiency recommendations and accepts the associated incentives.

- Ensure a Company engineer creates a Minimum Requirements Document as part of the application process.
- Remain engaged during the design development and construction process to ensure energy efficiency measures and solutions are incorporated in the building project to achieve the EUI targets.
- Perform a visual inspection and review all construction design submittals after project completion. If any HVAC controls or variable-load energy efficiency measures have been incorporated in the project, the Company requires field measurements to verify operation standards, as described in the Minimum Requirements Document.
- Monitor the EUI measurements over a prescribed period and under the prescribed conditions before final incentive payment is made based on the savings achieved.
- Offer an optional verification incentive to assist customers in identifying and correcting issues that may arise in the first year of occupancy to help achieve the EUI. Verification documents must be submitted to obtain the optional verification incentive.

2.2.3.2 Pathway 2: Streamlined/Systems Approach

The Company's Energy Efficiency team works with and approaches customers, building owners and owner representatives regarding new construction or major renovation projects. If a customer decides to move forward with a project, they can choose to: (1) select a vendor of their choice to install energy efficiency measures or (2) to develop the project with technical assistance from the Company's Energy Efficiency team. Once the measures are installed, the Company performs an inspection and reviews design submittals. Once there are documented savings from the project, the customer can receive the incentive.

2.2.4 2025 Program Enhancements and Changes

Regarding building codes, during the 2023 session, the Rhode Island General assembly passed legislation requiring the state to adopt the 2024 International Energy Conservation Cost (2024 IECC) within 3 months of its release. Based on conversations with staff at the International Code Council (ICC), the 2024 IECC is expected to be released in late 2024. The Company's standard practice is to not update a new construction baseline building code mid-program-year, and so the 2024 IECC will be used to update baseline assumptions for the 2025 program year. The IECC 2024 impacts are most likely to impact ~~upstream~~ New Construction Lighting Control Dimming and Occupancy sensor related savings. Additionally, the Appliance Standards and the ISP Kitchen Study will impact Midstream HVAC and Food Service measures. However, the Company has added~~add~~ a number of HVAC and Food Service measures to the ~~Upstream~~ Midstream portfolio ~~to~~ which will help to offset some of the potential impacts due to

Commented [AC36]: Can the Plan include a list of both impacted measures and new measures? Also seems like the goal should always be to add new measures if they are deemed viable for the program, not just to add new measures to adjust for baselines

Commented [RIE36R2]: Added new measures to this section, and provided the list of impacted measures below. And just to clarify, we are always looking for promising new measures, it just so happened that these new measure will help to offset some of the reductions in gross savings from IECC 2024.

IECC 2024, the Appliance Standards and the ISP Kitchen Study. ~~Code.~~ These measures include electric demand control kitchen ventilation, radiant conveyor toasters, <40- watt hot food holding bins, single burner induction cooktops, induction soup wells, steam tables, high volume low speed vans, high-efficiency evaporating units, and fan energy index rated fans.

The Company will also conduct a New Construction process evaluation beginning in the summer of 2024, with the findings from this evaluation likely impacting 2025 program developments. The evaluation will look to understand how the Company can improve on early engagement strategies with architects, developers, and design teams to influence energy efficiency. The evaluators will conduct a series of interviews with participants, non-participants, and partial participants to document program barriers and to develop potential strategies for improving program delivery. Additionally, the Company plans to understand how the simplified new construction process (e.g., moving from 4 pathways to 2 pathways) has been received by the design community and continue to find additional enhancements to increase participation and engagement.

2.2.5 Other Considerations

2.2.5.1 Customer and Vendor Feedback

The Company regularly solicits customer and vendor feedback through its Energy Efficiency team's interactions with customers, ~~and~~ design teams, and implementation vendors. These entities provide insights on what types of technical assistance and design support motivate builders, architects, and customers to adopt high efficiency measures and design practices, as well as possible opportunities to streamline the delivery of the program.

In discussing the New Construction Program with our implementation vendors, the Company found that improvements to our program delivery and engagement strategies could yield additional savings and participation. The Company is currently in the process of conducting a New Construction progress evaluation, the results of which will be used to formulate 2025 program improvements and modifications.

3. Large Commercial Retrofit Program

3.1 Offerings

The Company has several pathways by which customers can participate in the Retrofit Program for energy efficiency in existing buildings. ~~Customers can participate via the:~~

Commented [j37]: How does the delivery channel address increasing baselines? This doesn't make sense.

Commented [RIE37R2]: With IECC 2024/midsteam ISP updated, the Company has evaluated which measures are no longer eligible due to code, and the Company has recalculated the energy saving where the baseline has changed. And the Company has added new measures that exceed code.

Commented [j38]: This study sounds good. Suggest trying to identify non-participant firms to interview as well as partial participants (enrolled but didn't complete).

Commented [RIE38R2]: This is actually being covered by the evaluation but was just omitted from the original draft text. It's now added!

Commented [j39]: Feedback below didn't come from customers but rather program vendors. Suggest reframing to be more in line with multiple avenues the Company uses to obtain feedback.

Commented [RIE39R2]: Great point. Added to text.

Commented [AC40]: MA released its Custom Process evaluation. Section 6 includes very useful findings and recommendations that we should implement here. It is likely that the upcoming RI Custom Process Eval will have similar conclusions, save for those related to electrification. Has the Company reviewed? Would it be helpful to discuss the results and see what we can apply here?

MA23C04-B-CUSTPRPR-Custom-Pathway-Process-Study-Final-Report-2024-4-10.pdf (ma-eeac.org)

Commented [RIE40R2]: The Company looks forward to review the MA recommendation and await the RIE custom evaluation report to determine what improvements can be incorporated in future plans.

Commented [AC41]: MA released its Custom Process evaluation. Section 6 includes very useful findings and recommendations that we should implement here. It is likely that the upcoming RI Custom Process Eval will have similar conclusions, save for those related to electrification

MA23C04-B-CUSTPRPR-Custom-Pathway-Process-Study-Final-Report-2024-4-10.pdf (ma-eeac.org)

Commented [RIE41R2]: Thanks for passing this along, Adrian!

- **Downstream ~~Prescriptive~~ Application Process~~;~~: Customer can work** ~~By working~~ with a RI Energy Sales Representative, ~~or a~~ Project Expeditor ("PEX"), or other vendor to install energy efficiency equipment through ~~complete~~ a **Prescriptive application** for commonly installed measures (e.g. LED with controls) or a **Custom application** for any energy improvement ~~that is~~ not covered ~~by~~ through the Prescriptive pathway; or

- **~~Upstream~~ Midstream Lighting Initiative~~;~~:** This offering is described in Section 2.2 under the New Construction Program's ~~Upstream~~ Midstream Initiatives, however lighting savings for this initiative are included within the Retrofit Program.~~.~~

Commented [j42]: This seems to describe the custom app. Process. Please add prescriptive separately. Also please address how prescriptive is parsed between retrofit and end of life replacements

Commented [RIE42R2]: Good catch. Thank you. Addressed in text.

Commented [DM43]: Explain that lighting savings are captured within retrofit, while non-lighting up/midstream savings are claimed in NC.

Commented [RIE43R2]: Thank you. Noted.

The Retrofit Program also offers initiatives targeting specific market segments, such as the Grocery and Industrial Initiatives that focus on the specific needs of that customer type. The Company also serves some of its largest customers through Strategic Energy Management Partnerships that are described in more detail below. Although sector-specific initiatives are helpful in addressing customer needs that are shaped directly by the industry and geographies in which the customers operate, the Company recognizes that this approach does not cover the Company's entire C&I customer base. Therefore, the Company provides a number of energy efficiency solutions that are oriented towards specific technologies and trainings.

The following areas are included in the Large Commercial Retrofit program but are linked to specific technologies or trainings, as opposed to specific market sectors:

- Building Operator Certification training
- Equipment & System Performance Optimization Initiative
- Performance Lighting Initiative
- Customer-owned streetlights
- Company-owned streetlights
- Combined Heat and Power and fuel cells

3.2 Initiatives Primarily Targeting Large Commercial Retrofit

3.2.1 Industrial Initiative

The Industrial Initiative is available to all manufacturing and industrial customers and provides incentives and technical assistance services including free facility audits, project management, installer and customer education sessions, production systems and line efficiency coordination. In addition, the

Company provides support in identifying and implementing process-related improvements that increase the efficiency of business processes and energy consumption.

Historically, the Industrial Initiative has primarily targeted large C&I customers to ensure economies of scale. In 2025, the Industrial Initiative will continue to conduct outreach to customers in the 200-to-400-kilowatt (kW) range to encourage greater participation by medium-sized industrial facilities. The Company's intent is to improve parity among C&I customer sizes and capture projects with rapid paybacks such as variable frequency drive installations and enhanced controls.

The Industrial Initiative helps diversify the Electric Portfolio, with 66 percent of electric savings from January 2016 through July 2022 deriving from non-lighting measures including process equipment and controls (30 percent), compressed air (16 percent), HVAC (7 percent), and motors and drives (5 percent). For the Natural Gas Portfolio, the initiative contributes significant natural gas savings from process improvements.

3.2.2 Grocery Initiative

The EnergySmart Grocer Initiative serves commercial customers who sell food at the retail or wholesale level. The initiative offers technical assistance, project management, targeted incentives, financing, and education sessions for installers and customers. This initiative primarily delivers electric savings through lighting and refrigeration upgrades. In 2022, the vendor's compensation structure was altered to encourage greater emphasis on non-lighting measures.

The EnergySmart Grocer Initiative has been in place for roughly a decade. While low-hanging opportunities related to refrigeration and lighting have been largely saturated, some additional opportunities remain – especially among late adopters, although these customers are often more difficult to engage. The initiative now also focuses on O&M measures submitted through the ESPO initiative, as well as advanced controls measures and leak detection and repair. ~~Typically, refrigerant leak surveys are only performed when leaking refrigerant is visible to the naked eye or identified as a problem by the customer.~~ In 2025, the Company will further investigate natural refrigerants such as CO2, in response to hydro-fluo~~u~~rocarbon regulations.

3.2.3 National and Regional Restaurant Initiative

The Serve Up Savings Initiative serves regional and national restaurant chains. Local restaurants with multiple locations within Rhode Island are served by the Small Business Direct Install Program. For franchisees, the initiative offers incentives, project management, technical assistance, and collaboration to develop an integrated package of efficiency measures that work for franchisors.

Commented [j44]: Do they envision more hvac related savings coming out of this since they have already been addressing refrigeration?

Commented [RIE44R2]: Grocers are focused on refrigerants, given upcoming regulations and some are especially interested in using natural refrigerants (although large $$$ cost to convert).

We encouraged the EnergySmart Grocer vendor to work with these customers to identify possible projects that can be evaluated by RIE for energy savings and BCR (through the custom application process).

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Commented [DM45]: Most refrigerants are colorless (and odorless) so this doesn't make much sense. Furthermore, if a leak is visible, what's the point of a leak survey? You already know that a leak is present. Instead, the Company could direct leak surveys based on likelihood of leaks, such as systems that haven't been maintained and/or systems that are struggling to perform. Surveys could also target very large systems. Contractors can also be employed as a tool in identify leaks. All of these would be examples of a proactive approach to leak mitigation rather than reactive.

Commented [MH45R2]: Agreed. Some systems could have a dye added to make it somewhat visible, or possibly there could be oil mixed in that would give it a color, but often it will not be visible to the naked eye.

Commented [RIE45R3]: Thank you, this sentence has been removed.

Commented [j46]: It would be good if the Company could explore expanding leak surveys, perhaps starting with the largest refrigeration systems. Waiting for refrigerant leaks to be visible means operating the equipment with inadequate charge for a while. Perhaps explore energy savings associated with proactive leak id and abatement.

Commented [RIE46R2]: Good idea – something we can bring back to our EnergySmart Grocer vendor

Commented [DM47]: And low GWP. There are synthetic (non-natural) refrigerants that fall into this category.

Commented [AC47R2]: I'd ask the vendor if they have any knowledge of a program focused on this in Delaw ... [26]

Commented [RIE47R3]: Will do.

Commented [AC48]: And other low GWP refrigerants. Natural refrigerants such as CO2 and ammonia are th ... [27]

Commented [RIE48R2]: Good points – a complicated end use given the range between natural and non-natural refrigerants, the new regulations, and costs to chang ... [28]

3.2.4 Strategic Energy Management Partnerships Initiative

The Strategic Energy Management Partnerships (SEMP) Initiative is available to the Company's largest C&I customers. This initiative targets customers who commit to achieving deeper energy efficiency savings, are motivated by corporate and institutional sustainability goals and who have the in-house expertise to make organizational changes and make multi-year efficiency plans. Participating customers agree to specific savings targets that are memorialized in the form of a non-binding Memorandum of Understanding.

The initiative provides customers with customized support and offers them flexibility to address their corporate or institutional business needs while helping them meet sustainability, carbon reduction and efficiency goals. The SEMP Initiative helps customers think long term about their energy use, needs and equipment. This initiative allows a tailored approach to the site's or facility's specific needs and results in more comprehensive energy savings than traditional program offerings.

The Company has 13~~2~~ existing SEMP agreements in place with customers that operate in a number of different market sectors including chain restaurants, colleges and universities, health care, industries and municipal and state government. ~~Recent historic participation and savings achievement from the SEMP Initiative is as follows:~~

~~Year~~	~~Customers~~	~~Lifetime MWh~~	~~Lifetime Therms~~	~~Incentives Paid~~
~~2021~~	~~8~~	~~74,906~~	~~3,136,107~~	~~$3,544,162~~
~~2022~~	~~10~~	~~47,722~~	~~3,057,341~~	~~$3,423,492~~
~~2023~~	~~TBD~~	~~TBD~~	~~TBD~~	~~TBD~~

A dedicated SEMP Program Manager facilitates implementation across all the energy efficiency and customer programs, helping to reduce SEMP participants' transaction time. The Program Manager tracks progress towards goals and facilitates regular meetings and facilitates delivery of program resources to support emerging technologies and priorities.

Rhode Island Energy and the SEMP participants typically re-negotiate the SEMP MOU every three years, which can also include employee outreach for residential programs, neighborhood outreach for small business programs and electric transportation offerings and programs.

The Company will continue to leverage its SEMP partnership with the state and the Office of Energy Resources Lead by Example program to achieve energy savings goals with public entities, including state agencies, state colleges and universities, and municipal buildings.

Commented [DM49]: Is there a threshold?

Commented [RIE49R2]: There is no threshold for participation based on consumption.

Commented [j50]: It would be helpful to know the total loads of the SEMP customers in aggregate and the percent that is of the RI C&I electric and gas load (i.e., what share of RI C&I load do SEMP customers represent)

Commented [RIE50R2]: We can take this on and report out.

Commented [MH51]: From 2023? 2024? Are these reflected in the table below?

Commented [RIE51R2]: The data is not available for 2023 due to conversion of the EE tracking system.

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Commented [AC52]: Any updates on reporting total loads of the SEMP customers in aggregate and the percent that is of the RI C&I electric and gas load (i.e., what share of RI C&I load do SEMP customers represent)

Commented [RIE52R2]: SEMP is a growing portion of the total energy savings in the C&I portfolio and warrants a deep dive call in 2025 during either a Cteam call or Technical Working Group.

Commented [AC53]: Glad to see this table is still included

Commented [RIE53R2]: Unfortunately, the data is not available for 2023 due to conversion of the EE tracking system.

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Commented [DM54]: Why is everything for 2023 TBD? Isn't this known by now?

Commented [RIE54R2]: The data is not available for 2023 due to conversion of the EE tracking system.

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3.2.5 Building Operator Certification Training

The Company sponsors Building Operator Certification (BOC) training for facility engineers and maintenance staff. BOC training courses help operators make their buildings and facilities more comfortable and efficient. Many BOC participants also become aware of the C&I programs and actively seek out efficiency solutions for their facilities. As a result of these trainings, program participation and energy savings increase in the C&I programs. The Company will support two BOC training courses in 2025. Each course targets 22 participants.

Rhode Island Energy will pay up to 50% tuition reimbursement to one facilities management professional per commercial customer facility within a five-year period provided that the facilities management professional graduates from a Building Operator Certification ("BOC") Level 1 course and commercial customer facility meets the requirements. Tuition reimbursement is available for facilities management professionals who (i) graduate from the BOC Level 1 course; (ii) are Rhode Island Energy commercial customers or employed by one of those commercial customers; and (iii) have not taken the BOC Level 1 course within the last 5 years. Facility management professionals must work at a commercial customer facility in a facilities management position, e.g., as a facility manager, energy manager or in a role to reduce building-wide energy consumption. The commercial customer facility must have a minimum of 50,000 sq. ft. of conditioned building space. Rhode Island Energy may, in its sole discretion, modify or terminate this offer for tuition reimbursement at any time without notice. Reimbursements are provided to companies or organizations and cannot be dispersed to individuals only.

3.2.6 Equipment & System Performance Optimization Initiative

The Equipment & Systems Performance Optimization (ESPO) Initiative helps C&I customers optimize the efficiency of their HVAC, refrigeration, compressed air, and steam systems. Energy efficiency solutions include operations and maintenance (O&M), retro-commissioning and monitoring-based commissioning. The initiative is available to all C&I customers averaging greater than 2,000 building operating hours a year. This initiative helps customers capture energy savings and may be delivered through other initiatives (e.g., SEMP Initiative or Industrial Initiative).

The ESPO Initiative covers several technologies and end-uses identified in the Market Potential Study, including boilers (steam and hot water), energy management systems, refrigeration, rooftop units, scheduling and set point optimization, and waste energy recovery. The ESPO Initiative provides multiple pathways for participation depending on a customer's energy-saving opportunities, building characteristics and the sophistication of existing control systems. These pathways are detailed below.

Commented [j55]: FYI - MA will no longer be using the ESPO nomenclature in the next plan period. They are instead going to roll out a true retrocommissioning/EBCx offering. It would be good to see if such an initiative could be advanced in RI.

Commented [RIE55R2]: Yes, we recently came across this information. And while it may be too late to institute a change of that scale between now and the plan file date, we are certainly interested in learning more and potentially adopting some or all of the changes MA has rolled out in 2025!

Commented [AC56]: Separate but related note, there have been some controversial findings about condenser cleaning savings. A recent ASHRAE study suggests the measure is not really viable - warrants discussion of whether it should continue in the programs. Please discuss with RIE/GH EM&V staff

Commented [RIE56R2]: Noted. We look forward to having this discussion with the Cteam!

Commented [j57]: Does ESPO require third party commissioning, or does it allow controls vendors to participate? If it is the latter, suggest figuring out whether they have the skills. In VT we found that controls vendors don't have the skills to design optimized sequences of operations or to calculate savings consistent with what programs need.

Commented [RIE57R2]: Commissioning is not required for ESPO which typically involved low-cost tuning measures such as RTU coil cleaning and cleaning condenser coils.

Good point about controls vendors possibly not having the skills to design optimized sequences of operations which might be deployed with the ESPO measures involving WHOLE BUILDING & PROCESS TUNING and TARGETED SYSTEMS TUNING and not the low-cost tuning measures. More information about the ESPO offerings is available at https://www.rienergy.com/RI-Business/Energy-Saving-Programs/rebate-programs

3.2.6.1 Low-Cost Tuning Pathway

This pathway offers prescriptive incentives to customers for making common tuning improvements to building equipment and systems. These improvements are often identified through facility audits or retro-commissioning efforts. Prior to a customer or outside party receiving an incentive for installation, pre-approval must be obtained from the Company. In an effort to streamline this pathway, the Company has developed guidelines for documentation baseline conditions to enable program participants to implement some low-cost tune-up measures without pre-approval.

The Low-Cost Tuning pathway offers incentives to customers whose baseline conditions and proposed building upgrades are documented through a simple data input which is used to determine savings at the measure level. Only selected compressed air, HVAC, refrigeration, and steam measures are eligible for the pathway's prescriptive incentives. Customers who are participating in the other ESPO Initiative pathways (see below) may elect to apply for Low-Cost Tuning pathway incentives, eliminating the need to submit custom savings calculations.

3.2.6.2 Targeted Systems Pathway

The Targeted Systems pathway offers customers a custom retro-commissioning approach. The pathway provides an in-depth investigation of specific processes or end-uses. Investigation funds are available for System Tuning and incentives are offered per unit of savings for measures implemented through this pathway, with higher incentives available for meeting certain site-specific thresholds.

3.2.6.3 Whole Building & Process Tuning Pathway

The Whole Building & Process Tuning pathway delivers a comprehensive retro-commissioning approach for customers with a functional control system in place and whose electric usage is greater than 5 million kWh annually. The pathway offers investigation funds for system tuning and whole building and process tuning. Incentives are offered per unit of savings for measures implemented through this pathway, with higher incentives available for meeting certain site-specific thresholds.

3.2.6.4 Monitoring-Based Commissioning Pathway

The Monitoring-Based Commissioning pathway is similar to the Targeted Systems and Whole Building & Process Tuning pathways; however, this offering assumes that identified measures and savings will persist for at least three years. Monitoring-based commissioning is a process designed to maintain and continuously improve building performance over time. This is achieved through building monitoring and analysis of large amounts of data. Known as real-time energy management, a monitoring-based commissioning approach requires the installation of a software platform and monitoring equipment to capture and analyze operational data from a building's or facility's building automation system.

Larger systems can provide continuous monitoring of hundreds of control points within a building and provide building operators with fault detection and diagnostics capabilities. This allows building operators to identify equipment that is not operated as intended due to many factors including faulty programming, systems in need of maintenance, incorrect settings (e.g., scheduling or setpoints) and even damaged equipment.

3.2.6.5 Building Analytics Pathway

The Building Analytics Program was introduced in late 2022, the offering funds system set-up costs for monitoring-based commissioning systems from a closed Qualified Service Provider list. This offering was designed to address historical barriers to monitoring-based commissioning adoption. The Building Analytics pathway helps customers identify sites that would benefit from monitoring-based commissioning continuous monitoring, and fault detection and diagnostics. The Company provides upfront support for the installation of systems that produce unknown savings and vets best in-class providers and makes sector-specific referrals regarding which Qualified Service Provider can best serve the customer's business needs.

The Building Analytics pathway helps improve measure persistence through a focus on long-lasting measures (e.g., physical repairs and reprogramming of control systems), training for facilities staff and long-term service contracts. There is a limited pool of Qualified Service Providers for this niche field. The pathway helps customers minimize their program transaction costs and the providers give upfront guidance regarding required documentation and savings calculations. In addition, the providers deliver ongoing service analysis to help customer facilities staff interpret monitored-based commissioning system output and improve system functionality.

3.2.6.6 Additional ESPO Offerings

The Company has developed a guidebook that standardizes the process of completing and documenting retro-commissioning savings calculations and classifying different energy efficiency measures; efforts that have presented a significant challenge for prior ESPO Initiative participants and created an administrative burden for program implementation staff. This guidebook assists customers and trade allies who participate in the Monitoring-based Commissioning, Targeted Systems and Whole Building & Process Tuning pathways by answering common questions and eliminating points of confusion.

The Market Potential Study found that energy management systems realize the second-highest savings among electric non-lighting measures. While the ESPO Initiative is designed to improve the performance of existing equipment and systems, the monitoring-based commissioning and tuning investigations conducted very often lead to the installation of new energy management system equipment or the

Commented [j58]: Are there also continuous monitoring and FDD?

Commented [RIE58R2]: Yes, important to mention this in the text! This has been added above! Thank you!

Commented [AC59]: Prior RIE response: "We don't envision there being a bottleneck risk here. We currently have 6 service providers that are well staffed. It could be the case that certain QSP are busier than others due to customer selection, costs, and system compatibility; but we haven't encountered this yet. We will bring this up during the next BAP call, just to make sure we are on the same page with our vendor."

Any updates here? Just want to determine if the vendors think this may be a future risk

Commented [RIE59R2]: We recently had a meeting with the most engaged QSP and they did not seem to be concerned about bottlenecking or staffing.

Commented [AC60]: Agreed that QSPs in this pathway require unique skillsets. If this presents a risk to program scalability, how can we try to protect against such a bottleneck?

Commented [RIE60R2]: We don't envision there being a bottleneck risk here. We currently have 6 service providers that are well staffed. It could be the case that certain QSP are busier than others due to customer selection, costs, and system compatibility; but we haven't encountered this yet. We will bring this up during the next BAP call, just to make sure we are on the same page with our vendor.

reprogramming of controls.[3] The ESPO Initiative also helps municipal customers improve the efficiency of unit ventilators and other gas measures located in school classrooms and other occupied zones (i.e., not heating and cooling equipment located in mechanical rooms) as this equipment frequently needs significant tuning or repairs.

3.2.7 Performance Lighting Initiative

This initiative is open to all customers with a commercial account. All projects, for both existing and new construction projects, that qualify under the Performance Lighting Initiative must meet the following criteria:

- Average a minimum of 2,000 lighting operating hours per year,[4]
- Provide maintained light levels in accordance with the recommendations of the Illuminating Engineering Society of North America's 10th Edition Lighting Handbook or supporting Design Guides, and
- The customer must submit a copy of the manufacturer's technical specification sheets (cut sheets) for each type of eligible equipment to be purchased.

Performance Lighting Initiative incentives are offered in two tiers:

- Tier 1: Performance lighting—LED lighting with luminaire level lighting controls or wirelessly accessible controls, and
- Tier 2: Performance lighting—LED fixtures with networked lighting controls system.

3.2.7.1 Lighting Designer Incentives (LDI)

The initiative offers lighting design incentives to design teams for qualifying projects in both new and existing buildings. The Company maintains a list of qualified lighting designers, engineers and architects who have demonstrated at least five years of lighting design experience. Lighting designers are not allowed to sell products for projects where they receive lighting design incentives. The Company markets the program to the new construction and design community.

Lighting designers must have at least one of the following qualifications to earn the incentive:

[3] The reprogramming of controls is treated as an energy management system for C&I program purposes and is either assigned to the New Construction Program or Retrofit Program, depending on the situation.
[4] This criterion~~a~~ is before controls are implemented.

- **Lighting Certified.** This is granted to those designers who successfully complete the NCQLP (National Council on Qualifications for the Lighting Professions) Lighting Certification Examination.

- **Certified Lighting Energy Professional.** This is a certification awarded by the Association of Energy Engineers.

- **IALD Professional.** This is a professional membership status for the International Association of Lighting Designers.

- **Certified Lighting Designer.** This is a certification sponsored by the International Association of Lighting Designers. The guidelines for this certification are similar to those for the ESPO lighting design incentive.

The incentive must go directly to the lighting design team to fund their efforts to achieve lighting energy savings while maintaining quality lighting design. These incentives have been recalibrated to encourage projects to achieve higher tiers in Performance Lighting. The lighting design incentive must equal 20 percent of the customer's lighting incentive for Performance Lighting Tier 2 projects, 15 percent of the incentive for Performance Lighting Tier 1 projects and 10 percent of the incentive for all other projects. The Company has established a $15,000 maximum incentive per project.

~~Please note that the January 1, 2025, ban on mercury-containing linear fluorescent lamps will play a significant role in the 2025 Plan development~~. In 2024, the Company has worked with the EEC consultant team, evaluation team and others to determine how the mercury ban legislation will impact the 2025 Plan savings claimed through lighting. ~~The Company is currently awaiting an evaluation report which will detail the extent to which the Company will be able to provide lighting savings during program year 2025.~~

3.2.9 Combined Heat and Power Initiative

Combined heat and power (CHP) is the simultaneous production of electricity and thermal energy from a single fuel source. The CHP Initiative offers incentives and technical assistance to customers who install new construction and retrofit installations.

Eligibility:

To qualify for a Combined Heat and Power (CHP) energy efficiency incentive, a proposed project must meet the following conditions:

- Host customers must be in the franchise service area of the Company.
- Both new construction and retrofit installations are eligible; in either case, the baseline system must be documented.

Commented [DM61]: To provide context to this statement, can you show a chart with lighting savings in the 2024 Plan (perhaps by program) compared to the 2023 Plan and/or 2023 actuals? I'm able to see this information from the BC Model, but I think it would be helpful to have it in the Plan.

Commented [RIE61R2]: The Company can review the 2023 Plan lighting savings, the 2023 actual lighting savings, and the 2025 Plan lighting savings during a Quarterly Lighting Call.

Commented [AC62]: Is this currently underway? Ignore if this is included in the EM&V attachment

Commented [RIE62R2]: It is. Much of the work was done by non-Evaluators except for the calculation of the ADJUSTED MEASURE LIVES used in the TRM for retrofit projects. Savings for new construction projects or replace on failure are not being claimed in 2025. The exceptions include:
- claiming control savings for LEDs but not lamp savings
- claiming incremental savings from "standard" efficiency LEDs to "high" efficiency LEDs

- The CHP system must meet the applicable efficiency requirements listed in Table 4. System efficiency is calculated as Annual Useful Energy/Annual Natural Gas Input where:

  *Annual useful energy = Net Annual kWh*3,413/100,000 + utilized thermal output (therms)*

  Annual natural gas input = CHP gas input in therms (HHV)

- The equipment to generate electricity may be a combustion-based system (internal combustion engine, gas turbine engine, steam turbine), or a fuel cell system, and the facility will capture waste heat for use in the facility.
- CHP projects must reduce carbon emissions related to overall site energy use by a minimum of 40~~30~~%, which may be achieved through other simultaneous EE installations.
- The project must pass cost-effectiveness screening.

In order to support Rhode Island's climate objectives while still promoting CHP, for 2025 the Company proposes the following changes which are reflected in this plan.

- Total combustion-based system efficiency must be greater than or equal to 60%
- Back pressure and extraction turbines are no longer eligible
- Eligibility for incentives will be available to only those CHP projects that reduce carbon emissions related to overall site energy use (including source generation, even if out of state) by a minimum of 40~~30~~%; the amount of carbon reductions may be achieved through other simultaneous energy efficiency installations to achieve the site carbon reduction goal.

Offerings:

If a project has been shown to be cost-effective, presents no capacity or reliability concerns, and has met the required eligibility criteria, it will be eligible for a non-variable incentive. [5]

.

Table 4. Determination of Non-Variable Incentive Level for CHP Projects

System	Incentive
Fuel cell	$5~~7~~00 per net kW
Combustion-Based CHP with total system efficiency ≥60%	$6~~8~~00 per net kW
CHP (fuel cell or combustion-based) that utilizes more than 25% opportunity fuels, renewable natural gas, or biogas as the fuel source	$~~1,0~~750 per net kW

Commented [MH63]: Confirming these are based on capacity, not peak coincident demand?

Commented [RIE63R2]: Yes, the incentive levels are based on the net kW output of the CHP (e.g. the nameplate) after the removal of parasitic loads.

For the purpose of determining the non-variable incentive level, the Company has defined opportunity fuels, renewable natural gas and biogas as gaseous fuels derived from the biological breakdown of waste.

The CHP system costs must include: all system, auxiliary, and interconnection costs, and CHP maintenance. If the CHP system is receiving a tax credit or other financial arrangement that reduces the cost of the CHP project to the customer without distributing that cost reduction as an additional cost to other electric or gas ratepayers, it may be treated as a credit against the cost of the CHP project.

The CHP incentive package cap from the Company will be 70% of the total project cost inclusive of the installation incentive, incentives related to gas service, present value of any performance incentive, system reliability procurement incentive, and any other incentives related to the transaction. For new construction installations, the incentive cap will be 70% of the incremental cost difference between the cost of what would have been done absent the CHP project and the cost of the CHP project. In the event the incentive is greater than 70% of the total project cost, the incentive amount will be reduced to an amount equal to or less than 70%. A minimum of 20% of the energy efficiency incentive payment will be held until commissioning is completed.

An additional optimal operations and maintenance energy efficiency incentive capped at $20/kW-year ($1.66/kW-month) and $50/kW-year ($4.16/kW-month) for systems utilizing biogas will be offered as part of the incentive package for any project with a net output greater than one MW for a period of up to 10 years. No payments will be made until the unit is in operation and provides demonstrated load reduction. The optimal operations and maintenance energy efficiency incentive will be made semiannually based on actual metered load reduction. Load reduction performance will be based on the net daily metered kW output of the system during ISO-New England's on-peak periods averaged over each six-month period.

The optimal operations and maintenance energy efficiency incentive provides the customer with a post-commissioning incentive for maintaining or increasing the total system efficiency of the CHP system. This helps ensure the system is operating efficiently and that the system capacity savings are in-line with those bid into the ISO-NE Forward Capacity Market.

The customer will repay a portion of the incentive to the Company if the project is abandoned, removed from the premises, sold, or otherwise no longer utilized as the primary source of heat and electricity by the customer, within 10 years from the date of final incentive payment authorization. The repayment will be the energy efficiency installation incentive times the number of years remaining until the required ten years of service divided by ten.

Identification and Recruitment of Qualified CHP Projects:

The Company currently works with vendors and customers to identify CHP opportunities at customer locations. The Company promotes CHP systems and outlines the process for qualification and implementation of CHP facilities through the Company's energy efficiency programs. The Company has sales and technical staff that are the primary points of contact for customers and vendors with potential CHP projects. The Company will continue to communicate criteria for CHP assessment and will communicate to vendors so that their presentations to customers will be more consistent with Company technical assistance requirements.

Installation of Incremental or Additional Energy Efficiency Measures for Customers who have Previously Installed CHP:

The Company will individually review the installation of proposed incremental energy efficiency measures for customers who have previously installed CHP on site or who are adding additional energy efficiency equipment that might affect the performance of an existing CHP unit. The Company will carefully categorize and protect the benefits attributed to previously installed CHP projects, while at the same time foster any additional cost-effective energy efficiency measures that further reduce total energy use.

There are two types of project categories. The first category is "CHP Optimization" and involves measures which are installed with the purpose of increasing the output or operating efficiency of the existing CHP or other distributed generation (DG) unit; for example, the addition of combustion air precooling on a gas turbine CHP unit. In order to maintain compliance with ISO-NE's FCM rules, such projects will be tracked in the FCM, if applicable, as incremental output of the associated DG facilities. The second category is "Incremental EE", which includes "traditional" energy efficiency measures installed with the intent of reducing energy consumption in sites that have previously installed CHP. These measures may or may not affect CHP performance and output.

For locations where an existing CHP unit covers a large percentage of the total load at the facility, additional energy efficiency savings measures installed may result in lowering the output of the CHP system instead of a load reduction on the Company's electric grid. Therefore, to assess savings that can be claimed by the energy efficiency programs, hourly load mapping may be required to accurately assess the net savings on the Company's electric and gas distribution systems, which will be assessed at the Company's electric and/or gas revenue meters at the customer's site. In cases where a typically electric measure (like lighting) reduces the electric load enough to require reducing the CHP output, gas savings may result from a normally electrical energy efficiency measure and could be claimed in the Gas utility DSM programs.

Scoping Study/Qualification:

The Company will offer technical assistance on CHP projects beginning with a preliminary scoping of a potential site. This scoping will be based on an evaluation of:

- Monthly (or hourly, where available) electric, gas, and other fuel usage
- All site-specific forms of thermal energy end-uses
- Coincidence of electric and thermal loads
- Proposed project cost
- A high-level analysis of the fuel resources needed for the project and any actual or anticipated fuel capacity constraints and/or actual or anticipated fuel reliability issues

This scoping will determine if further study of the site appears favorable, i.e., provides CHP operating hours and load factors that would be an appropriate application of CHP.

Technical Assistance Study:

Assuming a favorable screening during preliminary scoping, Rhode Island Energy will offer to co-fund a TA study of CHP with the customer. The TA study will be performed by an independent, qualified engineering firm. This study will assess thermal and electric loads, propose an appropriate CHP size and technology, compile a budget cost estimate, and identify potential barriers to the technology, etc. Rhode Island Energy typically funds 50% of the cost of any TA study conducted by a preferred vendor selected by the Company, and up to 50% of the TA for other qualifying independent engineering firms. Any TA study by a CHP vendor or its representative which fulfills the CHP TA requirements may be accepted, though no co-funding will be provided. The TA study must be completed, submitted, and approved by the Company prior to implementation. The TA study must include an assessment of the likely on-peak kW reduction from the CHP given the proposed nameplate rating, the net CHP output after subtracting parasitic loads associated with the CHP, projected availability based on anticipated site-specific operating characteristics, performance data on other similar units, and a greenhouse gas analysis that estimates the change in greenhouse gas emissions expected from the project and a statement that informs the customer of the state goal to reduce greenhouse gas emissions by 45% below the 1990 levels by 2030; 80% below 1990 levels by 2040; and net-zero by 2050. (On-peak kW reduction = Net Output x Availability x % Loaded.) This kW load reduction should be used in the benefit-cost screening.

As indicated in the offering section, incentives are only available for CHP projects that reduce the carbon footprint of the host facility by more than 30%. To determine the customer's carbon footprint the Company will utilize the EPA Greenhouse Gas Equivalencies Calculator and the EPA CHP Energy and Emissions Savings Calculator. The TA study of the CHP proposal could include an assessment of energy efficiency measures that would help meet that objective. These opportunities themselves will be eligible for energy efficiency incentives and will help make sure that the CHP facility is correctly sized for the facility's needs and will avoid creating a disincentive for future load reduction at the site.

Cost-Effectiveness:

The screening for cost-effectiveness specific to CHP is included in the Rhode Island Test included as Attachment 4. The cost-effectiveness test for CHP includes economic benefits, as specified by the Least Cost Procurement statute. As requested by the Division, given concerns described in Attachment 4 over the inclusion of economic benefits, a sensitivity cost-effectiveness analysis will be performed excluding economic benefits for CHP systems with a net output of one MW or greater. These analyses will be provided as part of the notification process described elsewhere in this section for projects of one MW or greater.

Other Contract Terms and Guidelines:

In order to ensure proper operation of the CHP facility and persistence of energy savings, the following terms and guidelines will be required:

- As part of the TA study, a minimum requirements document (MRD) will be developed. This MRD will contain engineering hardware and operational specifications that directly affect the savings estimates developed in the TA study. Compliance with the MRD will be necessary to receive rebate payments.
- All systems greater than one MW will require electric, thermal and gas metering for commissioning and monitoring of system efficiencies.
- The project must be commissioned. Commissioning is a process following installation whereby a third party verifies that the project is installed and operating as detailed in the TA study and MRD.
- The customer must sign and produce a contract for O&M services through the first planned major overhaul of the CHP unit after post installation commissioning. On-going O&M contracts for a minimum of 10 years from project commissioning are recommended.

- Customers applying for interconnection of a CHP systems must not operate the unit until they receive the authorization to interconnect from the Company.
- kW-demand savings achieved via the electric energy efficiency programs, including CHP, will continue to be reported by the Company to ISO-NE as Other Demand Resources (ODR) and the revenue generated will be used to fund future energy efficiency projects through the Company's programs.

Qualification:

The cost of the project will be provided by a design/build or general contractor experienced with CHP projects and revised as necessary.

Attribution of CHP Energy Savings to the Company:

For CHP projects one MW or greater in size that meet the eligibility criteria, 100% of the project savings shall be attributed to the energy efficiency programs. For CHP projects smaller than one MW, the Company shall use the latest net to gross adjustments determined by impact evaluations conducted on the RI CHP programs. These evaluations shall be conducted at least once every five years.

Notification Process:

The Company shall inform the DPUC, OER, and EERMC of any CHP project with a net output of one MW or greater (where net is the nameplate MW output minus CHP auxiliary kW). The notification shall occur after the cost benefit screening and before the offer letter is presented to the customer. For CHP projects with a net output of one MW or greater, the Company shall submit the following documents for review by the Division:

Documentation demonstrating that the project would not move forward without energy efficiency technical assistance and/or incentives. The documentation shall justify its finding with the following evidence:

1. A letter signed by a senior executive or site operations manager stating that the project would not move forward without the energy-efficiency technical assistance and incentive;
    a. Documentation from the customer on all relevant leases, agreements or commitments related to the CHP system or incentive offer;
    b. Estimated project budget
2. A complete benefit cost analysis for the CHP project using the Rhode Island Test, as well as application of this test applying sensitivities related to the removal of economic benefits
3. A report including a natural gas capacity analysis that addresses the impact of the proposed project on gas reliability; the potential cost of any necessary incremental gas capacity and

distribution system reinforcements; and the possible acceleration of the date by which new pipeline capacity would be needed for the relevant area.

For any proposed CHP project greater than one MW:

1. The Company will submit a project description to the Division, providing all the pertinent details relating to the project.
2. The Division may submit information requests to the Company at any time after receipt of the project description. The Division may also submit follow-up data requests, as needed.
3. The Company shall respond to all information requests as soon as reasonably possible, but no later than fourteen days from receipt of information requests, unless the Division grants an extension.
4. The Division will make all reasonable efforts to communicate decisions around the provision of a notification of support within thirty days of the receipt of the last set of information request responses received from the Company.
5. To the extent that additional review time is required, the Division will provide notification to the Company.
6. If at the end of fifty days from the date the Company provided the project description to the Division, the Division has not provided to the Company its opinion of support or opposition to the project, the Company retains the right to make a filing with the Commission seeking approval of the CHP incentive. The Division retains its right to take any position on the project it deems appropriate and shall not be prejudiced by the fact that it did not provide an opinion to the Company within the fifty-day period.

Even if the Division provides its opinion to the Commission that the Division supports the CHP project, the Company must file a notification with the Commission, setting forth the pertinent facts relating to the project. If (i) the Commission takes no action within thirty days and (ii) the Division or any other party has not objected to the proposed project, the project will be deemed approved. If the Division or any other party objects, the Commission will set the matter for hearing.

Customer and Vendor Feedback:

Stakeholders including vendors and installers provided feedback at the 2024 Rhode Island Annual CHP Public Meeting.

Participation and Savings:

Due to the high capital cost and technical requirements of installing CHP, there is a very long lead time for a successful installation. With small numbers of projects and wide ranges of possible project sizes, the Company anticipates substantial variability in MW realized in any given year. Due to the high capital cost and technical requirements of installing CHP, there is a very long lead time for a successful installation.

The Company commits to providing an updated estimate of projects in the current-year pipeline in each annual Energy Efficiency Plan and reconciliation filing to the PUC going forward.[6] Direct notification shall be sent to the Division of Public Utilities & Carriers, the Office of Energy Resources, and the Energy Efficiency and Resource Management Council via email whenever a CHP project with a net output of one MW or greater is added, removed, or updated after the Technical Assistance Study and before the offer letter to the customer.

3.3 Eligibility

The program serves the needs of existing buildings in their pursuit of~~to~~ lower energy consumption. All C&I customers are eligible for the Retrofit Program.

3.4 Implementation and Delivery

The Retrofit Program offers customers a variety of pathways to participate. Typically, a Company sales representative is assigned to cover any large C&I account, defined as a customer with at least 1.5 million kWh or 100,000 therms of annual energy usage, schools, municipalities, and national accounts. The general customer journey through the Retrofit Program is:

- A facility audit or walk-through by the Company, customer or a third-party vendor identifies one or more energy efficiency opportunities.
- In most cases, especially custom measures, the Company provides an offer letter committing to a specific incentive and laying out the project's requirements. The customer signs and submits the offer letter.
- Once the energy efficiency measure is implemented, the customer notifies the Company. The Company's staff or vendors (often engineers) verify that the measure has been implemented in accordance with project requirements.
- Company staff (administrators, engineers, and sales staff) work with the customer to ensure complete documentation and to pay the incentive.

Commented [AC64]: Is it worth including a comprehensive customer journey in this attachment? Given our other comments about the RI/MA custom process evaluations, it seems worth building out some more detailed Plan content on custom pathways

Commented [RIE64R2]: The Company would be willing to consider this change for the 2026 Plan but cannot commit to this change for 2025.

Commented [j65]: Several steps appear to be missing. See MA Customer Process eval. graphic.

https://ma-eeac.org/wp-content/uploads/MA23C04-B-CUSTPRPR-Custom-Pathway-Process-Study-Final-Report-2024-4-10.pdf

Figure 2-1, page 9

Commented [RIE65R2]: This is not intended to be comprehensive but rather identify the "general" customer journey

[6] Other project information such as Name*, Approximate Size of CHP (kW and Net Lifetime MWh), Location, and Current Status (Scoping, Study, Notification Process, Under Construction, Post-Inspection or Commissioning), may be provided depending on the state of advancement of CHP projects.

Prescriptive Application

Customers can complete prescriptive applications by printing or submitting them online. Prescriptive incentives are available for a wide variety of standardized energy efficiency measures with "deemed" savings values, such as lighting equipment, air compressors, variable speed drives and steam traps.

Mid~~Up~~stream Process

The ~~Up~~Midstream Initiatives offer instant discounts (i.e., incentives) to customers for the purchase of qualified, high efficiency products including luminaires, kitchen equipment, water heating equipment and high efficiency heating and cooling technologies at participating distributors. By offering discounts through distributors, the Company obviates the need for individual customers to submit incentive applications, a significant barrier for non-managed and smaller customer accounts. Customers no longer need to submit applications for incentives, which drives far greater program participation and more equitable distribution of incentive funds. The ~~Up~~Midstream Initiatives impact the market by reducing the cost of energy-efficient products compared to less efficient alternatives and by encouraging distributors to stock and promote high efficiency products. Note: The ~~Up~~Midstream Lighting Initiative's savings and budget are captured within the Retrofit Program and the ~~Upstream~~ Midstream HVAC and Food Service Initiatives are captured within the New Construction Program.

Custom Application

A Company sales representative or project expeditor assists customers and their vendors with the completion of the Retrofit Program's custom applications. These are applications for the installation of any energy efficiency measure not incentivized through the Prescriptive or ~~Upstream~~ Midstream Initiatives. A custom measure typically requires a Minimum Requirements Document that provides details regarding project guidelines and engineering specifications. Custom measures also require detailed savings calculations completed by a combination of customer, vendor and Company staff. For some projects, additional post-installation monitoring must be completed prior to incentive payment to ensure projects perform in accordance with the Minimum Requirements Document.

Project Expeditors

The Company utilizes project expeditors to provide turnkey services for Retrofit and New Construction Program projects. A project expeditor is an authorized vendor who serves as a customer's main point of contact and personal guide to energy cost savings. Several project expeditors work closely with the Company's account management team to evaluate energy efficiency opportunities and determine incentives. A project expeditor can connect large C&I customers with the latest energy technology solutions and savings on equipment including:

- Lighting and lighting controls,

- HVAC efficiency improvements,
- Energy management systems,
- Variable speed drive upgrades for fans, motors, and pumps in HVAC, refrigeration, and other systems, and
- Gas heating and hot water system upgrades,
- Compressed air solutions, including air compressors, dryers, drains and engineered air nozzles.

3.5 2025 Program Enhancements and Changes

Building Analytics Initiative

In 2025, the Company will scale up the Building Analytics Initiative to help customers optimize the performance of HVAC equipment and other systems. The Building Analytics Initiative launched in 2022, with the selection and onboarding of Qualified Service Providers, finalization of program materials, and initial outreach to customers. In 2024, outreach and system installation are expected to ramp up. Although it often takes a full year after system installation to achieve significant customers savings, therefore we expect to see increased savings from this offering beginning in later 2024 and into program year 2025.

Commented [AC66]: Is the Company still offering enhanced cost-share incentives for customers who agree to a case study?

Commented [RIE66R2]: Yes, but only for the first university to participate. We have since found a customer that has agreed to share data for a case study. So best not to publish!

Technical Processes

In 2025, the Company will continue to deploy and leverage newly developed prescriptive and custom energy savings tools and calculators for specific measures, such as the Heat Pump Hot Water Heater calculator, the weatherization tools (both prescriptive and custom express), the Energy Management~~Managements~~ System prescriptive tool, and the redesigned of the prescriptive Steam Trap. The Company expects all ~~of~~ these tools and calculators will yield savings in 2025.

Additionally, the Company will continue to utilize a data-driven approach to increasing customer participation in the commercial and industrial sectors. This includes analyzing customer consumption data (kWh, peak load, and therms) and past energy efficiency participation to better target customers, especially non-participants and customers with scheduling inefficiencies. The Company will leverage Energy Profiler Online and customer energy reports to determine which customers have scheduling inefficiency and then to follow-up with specific outreach strategies (individual engagement, webinars, site visits, or virtual meetings) to discuss technologies and energy solutions.

Commented [AC67]: Does the Leidos data analytics platform for 15-minute interval data have the ability to disaggregate consumption by end use? Low-hanging fruit from improving equipment/system schedules can help get customers hooked, but optimizing full systems requires detailed data

Commented [RIE67R2]: It does not disaggregate consumption by end use. Intended to "get our foot in the door" requiring relatively low level of involvement by the (sometimes reluctant and always busy) customer. But realizing savings with this "quick" analysis can then help convince the customer to proceed with measures that allow us to collect detailed data.

3.6 Other Considerations

Workforce Development

In 2025, the Company will look to hire a Trade Ally Engagement Specialist. The Engagement Specialist will seek to better engage trade allies (e.g. contractors) with expertise in HVAC, controls, refrigeration and other non-lighting technologies to participate in RIE EE programs. The position will help to build relationships with contractors, educate on energy efficiency incentives, and breakdown barriers to participation. This participation is critical to diversifying the Company's portfolio and to ensure trade allies are skilled in non-lighting measures. The installation of high-efficiency equipment and sophisticated control systems is critical given the decline in lighting savings.

Code Changes for 2025

Regarding appliance standards, the Company will make changes to the ~~Upstream~~ Midstream Initiative's new construction baseline assumptions for food services, lighting, and HVAC equipment as applicable. These strengthening standards help lower overall energy consumption at a macro level;~~,~~ however they lessen the claimable savings potential for affected measures as they close the gap between high-efficiency options and the least-efficient options available on the market. As baseline standards continue to rise, the Company will continue to identify and support appliances which still have significant claimable savings potential.

Commented [AC68]: From Dan: It may be reasonable to maintain support for custom retrofit measures, with savings that either incorporate a mid-life baseline shift or an adjusted measure life to account for the mercury law.

Commented [RIE68R2]: Agreed. We can always use CUSTOM for projects with attributes such as described by Dan.

A good example might be using CUSTOM for new construction/major renovation projects involving high efficiency LED fixtures that claim savings compared to "standard efficiency" LEDs.

4. Small Business Direct Install Program

Commented [j69]: MA is adopting new strategies to address the split incentive barrier. It would be good for RIE to become familiar with those strategies and include as appropriate. I really like support for the energy aligned lease clauses.

Commented [RIE69R2]: Would be great if we could discuss the "energy aligned lease clauses". This sounds complicated given that RIE provides Small Business customers the option to finance their share of the project cost. Lets circle back on this at the next upcoming Sector call.

4.1 Offerings

The Small Business Program offers a no-cost site assessment conducted by a Small Business Energy Specialist to understand the customer's energy-related needs and goals. This site assessment identifies energy efficiency measures including lighting systems and controls, cooler/refrigeration controls, water saving measures, HVAC controls, motor controls, weatherization/insulation and custom measures. The Small Business vendor offers turn-key installation and on-bill refinancing to support the adoption of the recommended energy efficiency measures to the customer.

The program also offers a Customer Directed Option pathway. In this pathway, customers may use their own electrician and installers to install measures while the Small Business vendor processes and submits all necessary paperwork to the Company.

Commented [j70]: Is the CDO only for electric measures? If not, please clarify. In MA the program vendors are also doing a comprehensive assessment when they do quality control/post install site inspection. Is RIE offering this?

Commented [RIE70R2]: CDO can be gas and electric -- good catch. Corrected in the text.

4.2 Eligibility

Commercial customers who have less than 1.5 million kWh in annual usage may participate in the Small Business Program. K-12 schools, national and regional chain restaurants, and small grocery stores who consume less than 1.5 million kWh per year are excluded from this program as they are served through other pathways or initiatives.

4.3 Implementation and Delivery

Customers have a number of ways to participate in the Small Business Program, whether through outreach (e.g. placed advertisements, emails, direct mail campaigns, social media, events and conferences) by the Company and/or the implementation vendor or a customer~~If a customer is interested in participating in the Small Business Program, they can~~ signing up for an energy assessment by either calling, emailing or using an online form to express interest in the program. After this initial contact, the customer is connected to a dedicated Small Business Program representative to learn details about the program's processes and next steps. The program vendor schedules an assessment with the customer and an Energy Specialist will meet the customer at the scheduled time. The Energy Specialist performs an energy assessment, identifies strategies to pursue opportunities, reviews design considerations with the customer, and incorporates the energy efficiency measures identified into a proposal. The proposal reflects the installed costs, the expected energy savings and the applicable program incentives.

Commented [j71]: This speaks to customer seeking the program. However, it is job of the program to drive customers in the door, to conduct outreach and remove barriers. Please add language to address these aspects.

Commented [RIE71R2]: Good point. Addressed in the text

4.4 2025 Program Enhancements and Changes

Commented [DM72]: Has SBDI diversified to focus on more non-lighting measures?

Commented [RIE72R2]: Yes, energy efficient transformers and other non-lighting measures (e.g. weatherization, smart strips) were added in 2024. In 2025, HVAC controllers (Swarm Logic) and heat pumps are being added.

4.4.1 Equity

4.4.1.1 Multilingual Outreach

In 2025, the Company will continue to incorporate two equity-related initiatives. The Company and its Small Business implementation vendor will continue to seek to deploy bilingual auditors who speak either Spanish or Portuguese – the two most widely spoken languages besides English in Rhode Island. The Program currently has a Program canvasser that is bilingual and a Brand Manager on staff located in Cranston, RI who speaks five languages. They are available to assist with translation and outreach services when needed. Customers calling the implementation vendor has access to a translation service used for the Residential Programs, if needed. ~~-~~The program will continue to target its marketing directly to Woman and Minority Owned Enterprises (WME) and will seek to collaborate with the Rhode Island Center for Women and Enterprise (https://cweonline.org/our-centers/cwe-rhode-island). In addition, the implementation vendor will continue to engage with and develop ~~This effort extends beyond the WME businesses registered with the state and seeks to develop long-term~~ relationships and partnerships with groups such as the Rhode Island Black Business Association and the Rhode Island Hispanic Chamber of Commerce . ~~to determine how to better serve these businesses. The Company's vendor also canvasses in conjunction with local community organizations, such as Progresso Latino.~~

Commented [j73]: Suggest adding the center for women and enterprise

Commented [RIE73R2]: We will have our vendor reach out to Center for Women and Enterprise. Added text.

Commented [AC74]: Great inclusion in the plan

4.4.1.2 Main Streets Initiative and Microbusinesses

Finally, the Communities Initiative includes equity elements, including a focus on microbusinesses, as described in the Main Text of the 2025 Plan. The Company continues to integrate its program outreach efforts with the Main Streets Initiative to increase adoption of direct install energy efficiency measures among underserved microbusinesses in Rhode Island. In 2025, through its turnkey vendor, the Company will continue to target microbusinesses concentrated around the main streets of three communities. For each targeted community, the vendor will conduct targeted direct mail and/or social media followed by door-to-door outreach for 3-7 working days. For door-to-door canvassing, the vendor may seek to secure cooperation and support of local government leaders, community organizations, and neighborhood groups (e.g., chamber of commerce). The ~~XX~~5 communities targeted in 2025 will be identified in early 2025 and the Company will look to focus on economic development communities as well as towns with historic low participation rates. ~~are [List of Communities for Main Street to be provided]. The Company has committed to completing Main Streets initiative for a minimum of X out of these X communities in 2025 with a minimum of two campaigns for the larger communities, including promoting these campaigns on the Company's website. These communities contain Environmental Justice areas and are also targeted for enhanced outreach through the Company's Income Eligible programs.~~ The Company will also continue to report on participation in the Small Business Program by customer size (e.g. annual kWh usage).

4.4.2 Decarbonization

~~In 2025, the Company will~~In 2025, the Company will continue to monitor the progress of electrification efforts being funded through state and federal programs. To date this has included efforts such as collaborating with the Office of Energy Resources to promote the Clean Heat RI Program to small business customers. ~~look to leverage the newly developed prescriptive and custom offerings to promote commercial weatherization and greenhouse gas emissions reductions. This will include the deployment of prescriptive weatherization and air sealing offerings for the Small Business Program and Retrofit Program. The Company also plans to work with the Officer of Energy Resources to better understand electrification efforts being funded through state and federal programs.~~ In addition, in 2025 the Company will promote heat pumps to customers heating with electric resistance heat.

~~4.4.3 Increase Program Participation~~

~~In 2025, the Company will integrate Small Business Program outreach efforts with its Main Streets Initiative to reach more small businesses located in Environmental Justice Areas.. In addition, the Company plans to deploy multilingual marketing materials and program materials in an effort to increase participation in the Small Business Program. In 2025, thethe Company will report on participation in the Small Business Program by customer size (e.g. annual kWh usage).~~

Commented [AC75]: Will they be able to report this data in quarterly reports or included it in Plans? Thinking more about tracking these trends over time to assess whether targeting efforts are effective at reaching underserved zip codes

Commented [RIE75R2]: Yes, we can report on Main Street leads, audits completed, and participation (i.e. proposals that proceed to projects) after the Main Street campaign concludes, similar to reporting in 2024 on Main Street progress (e.g. TWG meeting in late June, ongoing C&I Sector calls with the consulting team).

Commented [j76]: This doesn't speak to any equity component. Is micro business the only aspect that is equity?

Commented [RIE76R2]: The Small Business Program is focusing on expanding its auditors and canvassers that are multi-lingual while also expanding its promotion through organizations that support minority-owned businesses.

Commented [AC77]: There was a Map of RI included in the Small Business Process Evaluation that showed participation rates in different zip codes. Is it possible to track trends in participation rate over time? The map was very helpful for illustrating participation gaps

Commented [RIE77R2]: RISE has done analysis to determine participation rates over the last few years which will be used to identify towns with historic low participation rates.

Commented [AC78]: There isn't any mention of the efforts to identify and displace electric-resistance heating in the C&I sector in this section. Is that not an anticipated strategy for 2025? If not, then it definitely should be. Our understanding was that the Company has done some initial billing analysis to identify ER-heating customers

Commented [RIE78R2]: Added heat pump promotion to customers heating with electric resistance heat.

Commented [j79]: This is great. It would be good to understand more about it. How many customers are ... [29]

Commented [AC79R2]: Adding a data-related question to this, but how will this be reflected in the Plan num ... [30]

Commented [RIE79R3]: Yes, the heat pump measure is currently included in the CUSTOM HVAC measure wit ... [31]

Commented [AC80]: Unsure what exactly this means. I thought the Main Streets were part of the Small Business program

Commented [RIE80R2]: It is. Deleted this section and moved the Small Business microbusiness reporting commitment to the Microbusiness section above.

5. C&I Multifamily Program

5.1 Offerings

See Attachment 1: Multifamily Program.

5.2 Eligibility

See Attachment 1, Section 3, for eligibility information. In addition to the criteria listed in Attachment 1, Section 3, the C&I Multifamily Program provides joint residential and commercial energy services to condominiums and apartment complexes for energy efficiency upgrades with no cost audits. The program also serves customers like non-profits, group homes and houses of worship that traditionally do not fit within the predefined program structure.

5.3 2025 Program Enhancements and Changes

See Attachment 1, Section 3, for 2025 program enhancements and changes.

6. Finance as an Enabling Strategy

Many customers face challenges in bringing energy efficiency projects to fruition. These may include structural limitations within a business, information overload, cultural resistance within companies, and access to capital. The Company's plan deals with the first three barriers in various ways, but this section of the plan focuses on mechanisms that can help customers afford to carry out energy efficiency upgrades and/or perceive costs differently.

6.1 Mechanisms Offered

The Company and its partners have developed four primary finance mechanisms to help customers afford energy efficiency upgrades, each with unique attributes. Some may only be available or apply to certain customers, building, or ownership types.

6.1.1 On Bill Repayment – Electric

On-Bill Repayment – Electric, for commercial customers who consume less than 1.5 million kWh per year	
Loan Size	$1,000 to ~$100,000 (may be larger for SEMP Initiative)
Maximum Tenor	5 years for commercial accounts, 7-10 years for State facilities

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On-Bill Repayment – Electric, for commercial customers who consume less than 1.5 million kWh per year	
Loan Volume	Variable, between $5.0M to $10M per year
Benefits to Customer	No formal credit check/ rapid approval, on bill repayment, zero interest
Limitations	Maximum tenor too short for many comprehensive upgrade
More Information	The Company's most recent Small Business revolving loan fund projections are illustrated in Attachment 5, Table E-10
Relevant Notes	

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Commented [AC81]: The Company cannot currently report on OBR volume by customer size category, but asked for that information because we haven't revisited financing offers in some time. I wonder if there are gaps in offerings, or opportunities to offer better financing to smaller customers (with less resources) while adjusting offers for larger customers that are more likely to be able to participate with slightly less attractive financing offers.

Commented [RIE81R2]: RIE agrees to provide data on Small Business projects that are not eligible for financing (i.e. not eligible because the account has past due arrearages) that (a) proceed with the lump payment option or (b) do not proceed with the project. Based on the analysis the Company can better assess next steps to provide more attractive offers for customers with less resources. [Note: The Company had offered financing to 100% of participants prior to the 2010's.]

Commented [AC82]: Is there data on OBR volume by customer category? Category being annual electric consumption (e.g. 0-100,000 kWh, 100,000-150,000 kWh, etc.)

Commented [RIE82R2]: Currently we don't have OBR data by customer size but could work to report on this after IEnergy reporting is up, stable, and available. In general, all eligible customers are offered financing. Customers choose whether they want to finance at zero interest or pay a lump sum (and get a 15% discount on their copay).

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6.1.2 On Bill Repayment – Electric Small Business

On-Bill Repayment – Electric Small Business, for commercial customers who consume less than 1.5 million kWh per year	
Loan Size	$500 to $50,000
Maximum Tenor	5 years
Loan Volume	Variable, between $1.8M and $3.0M per year
Benefits to Customer	No formal credit check / rapid approval, on-bill repayment, zero percent interest
Limitations	Maximum tenor too short for many comprehensive upgrades, cannot be used to support upgrades customers may want, such as windows and roofs as they have a benefit-cost ratio less than 1.0
More Information	The Company's most recent Small Business revolving loan fund projections are illustrated in Attachment 5, Table E-10
Relevant Notes	

6.1.3 On Bill Repayment – Natural Gas

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On-Bill Repayment – Natural Gas, all commercial gas customers	
Loan Size	$1.000 to ~$100,000 (may be larger for SEMP Initiative or special projects)
Maximum Tenor	3 years for commercial accounts, 5 years for State facilities

On-Bill Repayment – Natural Gas, all commercial gas customers	
Loan Volume	Variable, between $1.0M and $1.5M per year
Benefits to Customer	No formal credit check / rapid approval, on-bill repayment, zero percent interest
Limitations	Maximum tenor too short for many comprehensive upgrades, cannot be used to support upgrades customers may want, such as windows and roofs as they have a benefit-cost ratio less than 1.0
More Information	The Company's most recent Natural Gas revolving loan fund projections are illustrated in Attachment 6, Table E-10
Relevant Notes	

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6.1.4 Efficient Buildings Fund

Efficient Buildings Fund, state agencies, quasi-state agencies and municipalities	
Loan Size	More than $5M
Maximum Tenor	Up to 20 years
Loan Volume	Variable, over $60M in loans closed to date
Benefits to Customer	Below market rate interest, long tenor and loan amounts can be large enough to make comprehensive building wide improvements
Limitations	Appropriate customers must file applications and be ranked against other potential loan applicants
More Information	More details on this program can be found online at the Rhode Island Infrastructure Bank webpage and the OER Resources webpage
Description	The Efficient Buildings Fund is a long-term, below-market financing option for municipalities and quasi-public agencies to complete energy efficiency and renewable energy projects. The fund is administered in partnership with OER and the Rhode Island Infrastructure Bank (RIIB). OER is responsible for determining project eligibility, reviewing project applications, and producing a Project Priority List. RIIB only finances projects that are listed on the Project Priority List

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Efficient Buildings Fund, state agencies, quasi-state agencies and municipalities	
2024 Actions	RIIB and OER will administer the program and the Company will continue to provide technical, logistical and incentive support to municipal customers

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6.1.5 Public Sector Revolving Loan Fund

The Public Sector Revolving Loan fund was a predecessor of the Efficient Buildings Fund. It was funded by Regional Greenhouse Gas Initiative (RGGI) funds controlled by OER. This fund no longer makes loans. As funds are repaid from previous disbursements, they are periodically transferred back to RI OER to be used at their discretion. More details on this fund can be found in Attachment 5, Table E-9.

6.1.6 Commercial Property Assessed Energy (C-PACE)

C-PACE, owners of non-residential properties	
Maximum Loan Size	Limited by the financial health of the building
Maximum Tenor	Average measure life of all upgrades, can exceed 15 years
Loan Volume	Variable
Benefits to Customer	Can be structured to be cash flow positive, no personal guarantees, financing can be used to finance a wide variety of improvements related to energy, may be considered an operating expense
Limitations	**Minimum transaction value of ~$50,000, preferred $100,000+**

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6.1.7 Ascentium Rental Agreement

Ascentium Rental Agreement, owners of non-residential properties	
Maximum Loan Size	No stated limit
Maximum Tenor	Variable
Loan Volume	Variable
Benefits to Customer	Rapid preliminary approval, rental product is considered an operating cost

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Ascentium Rental Agreement, owners of non-residential properties	
Limitations	Specific terms of the agreement may not be attractive to some customer types, including any that are reluctant to take on debt

7. Marketing to C&I Customers

~~The Company aims to represent the voice of the customer in all campaign planning. Rhode Island Energy will pay close attention to how economic conditions impact customers and maintain a nimble approach. These conditions include inflation, labor market shortages, and long-term market changes.~~

The Company will continue to leverage digital marketing, paid Google search and social media marketing with LinkedIn, print advertising, direct mail, and email campaigns. Partnerships with Providence Business News, www.pbn.com, and www.bizjournals.com/rhodeisland/ proved especially effective in making a local connection with businesses in Rhode Island.

RI Energy's paid media primarily targets direct decision-makers for capital budgets and facilities projects, C-suite executives, facility managers, and small business owners. A portion of advertising and communications are also dedicated to targeting other key influencers who influence energy project go-forward decisions, such as distributors, PEX's, engineers, and architects who may have existing relationships with customers.

The Company will continue to adjust tone and messaging as appropriate to remain sensitive to our customers' needs. Rhode Island Energy updates its website and campaign landing pages to reflect key messages, strategies, and general core values and has also increased focus on providing industry-specific messaging and information wherever possible. A new and improved website is targeted to expected to launch in ~~May~~ August 2024.

Finally, the Company will tie its marketing activities to the energy efficiency program priorities described elsewhere in this plan. This includes:

- Promoting planned Workforce Development activities, potentially via social media.
- Developing fact sheets to explain program focus areas such as Building Analytics, ESPO, or lighting controls.
- Developing case studies to highlight efficiency opportunities in specific market sectors.

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Commented [j83]: What does this mean? This sounds good, but the details are crucial. Is someone going to think about the customers when planning campaigns or will there be a more concerted effort to actually test messaging, use customer focus groups etc. as truly customer oriented marketing campaigns typically do?

Commented [RIE83R2]: Limited budgets prevent using tactics such as customer focus groups to test messaging.

The first paragraph has deleted.

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Commented [j84]: How does the Company track the effectiveness of these efforts? Does it capture customers from contact into engagement and through project completion? This will really let you know how effective this spending is.

Commented [RIE84R2]: Difficult to track results of email, social media and other marketing campaigns because, for example, email open rates may not result in new EE projects.

However, raising awareness and monitoring whenever possible the source of how the participant learned about the program is an indicator of success. Also, process evaluation studies will sometimes attempt to gain insights.

Commented [AC85]: Mentioned using the EE Consumer Advocate to help facilitate more local partnerships and engagement with small businesses at the community-level. Seems that the Consumer Advocate is only focused on residential programs, so it might be beneficial to apply a small business lens to the Advocate's work

Commented [RIE85R2]: For C&I:
- RIE onboarded a marketing contractor focused on the C&I programs
- RISE and the RIE contractor are engaging with organizations that support minority-owned businesses
- RIE is looking to reduce costs when possible to better align program costs with the benefit streams emphasized by the PUC.

Therefore, at least for now, RIE is not looking to engage the Consumer Advocate, especially until we have greater confidence that their work overlaps with business customers. Much of the Consumer Advocate work is ... [32]

Commented [AC86]: I thought this was a forthcoming change. Can the plan summarize the changes to the site if they've already occurred?

Commented [RIE86R2]: New target date is August 2024.

8. Commercial and Industrial Measures and Incentives

Table 5 below lists the planned measures for the electric Commercial and Industrial programs, by program, along with the planned quantities (in kWh or MMBtu savings), incentives per quantity, total incentives, and annual and lifetime savings. Table 6~~Table 6~~ ~~shows planned costs in non-incentive cost categories for each program that are not allocated at the measure level.~~ 6~~Table 6~~6 ~~and~~ **Error! Reference source not found.**~~Table 8~~ shows 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 5. Planned Measures for Electric Commercial and Industrial 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)	L[illegible] C[illegible] R[illegible] (S[illegible] T[illegible]
Large C&I New Construction	Advanced Building	417,454	$0.45	$187,854.19	175.5	2,808.6	49.0	6.6	80.2	[illegible]
Large C&I New Construction	Air Cooled AC - 5.4-11.25 T	185,832	$0.25	$46,458.00	139.0	2,085.0	12.0	0.0	75.4	1,131.7
Large C&I New Construction	Air Cooled AC - 11.25-20 T	52,062	$0.25	$13,015.50	38.9	584.1	3.4	0.0	21.1	317.1
Large C&I New Construction	Air Cooled AC - 20-63 T	34,388	$0.25	$8,597.00	25.7	385.8	2.2	0.0	14.0	209.4
Large C&I New Construction	Air Cooled AC - over 63 T	16,713	$0.25	$4,178.25	12.5	187.5	1.1	0.0	6.8	101.8
Large C&I New Construction	AirCChiller - IPLV	37,874	$0.26	$9,847.37	36.6	842.2	10.0	1.9	16.6	381.6
Large C&I New Construction	AirCChiller - Peak	37,874	$0.26	$9,847.37	36.6	842.2	10.0	1.9	16.6	381.6
Large C&I New Construction	AirCChiller - 150to300T	37,874	$0.26	$9,847.37	36.6	842.2	10.0	1.9	16.6	381.6
Large C&I New Construction	AirCChiller - to150T	37,874	$0.26	$9,847.37	36.6	842.2	10.0	1.9	16.6	381.6
Large C&I New Construction	AirHP - Pkg to5.4T	125,098	$0.40	$50,039.20	93.6	1,122.9	13.6	0.0	50.8	609.5

Commented [AC87]: Are the new upstream measures (e.g., kitchen DCV) included here and in the BC models? Couldn't seem to find them. Also the text mentions targeting electric resistance heat in the C&I sector. Are those installations and estimated cost/savings impacts lumped into a Custom HVAC measure or can the Company create a separate line item?

Commented [RIE87R2]: The new upstream measures are not included here and in the BC models.

The heat pump measures are lumped into Custom HVAC for 2025. We are planning to add an HEAT PUMP measure into I-Energy going forward but was unable to prior to the development of the 2025 Plan.

Additionally, CADEO/RISE analysis of the small business population shows somewhere between only 500-2500 customers using electric resistance heat.

Commented [MH88]: The tables in this section are huge and hard to digest. A couple ideas:
Have the column headings repeat on each page
Consider removing rows with all zeros - those measures could just be listed at the end as offerings with no participation expected.

Commented [RIE88R2]: This is something the Company will seek to accommodate either for the final draft or during next years Planning Process.

Large C&I New Construction	AirHP - 5.4-11.25T	4,020	$0.15	$598.47	3.0	36.1	0.4	0.0	1.6	19.6
Large C&I New Construction	AirHP - 11.25-20T	2,603	$0.13	$325.59	1.9	23.4	0.3	0.0	1.1	12.7
Large C&I New Construction	Boiler, Draft Fan	3,542	$0.31	$1,106.88	3.0	44.7	0.2	0.2	1.4	20.3
Large C&I New Construction	Boiler, Feedwater Pump	3,542	$0.31	$1,106.88	3.0	44.7	0.2	0.2	1.4	20.3
Large C&I New Construction	Building Exhaust Fan	3,864	$0.31	$1,197.84	3.3	48.8	0.3	0.3	1.5	22.1
Large C&I New Construction	Building Shell	43,018	$0.50	$21,509.00	31.1	778.2	0.0	0.0	14.2	355.4
Large C&I New Construction	Chiller	345,117	$0.53	$182,566.89	249.7	5,744.1	36.8	38.6	114.1	2,623.3
Large C&I New Construction	Chiller, Water Pump	3,542	$0.31	$1,106.88	3.0	44.7	0.2	0.2	1.4	20.3
Large C&I New Construction	CODES AND STANDARDS	317,900	$0.00	$0.00	317.9	6,358.0	0.0	0.0	129.1	2,581.3
Large C&I New Construction	Commercial Electric Combination Oven	22,316	$0.18	$4,016.88	16.7	200.3	2.8	2.9	9.1	108.7
Large C&I New Construction	Commercial Electric Convection Oven	35,206	$0.23	$8,210.94	26.3	316.0	4.4	4.5	14.3	171.5
Large C&I New Construction	Commercial Electric Fryer - Large	1,509	$0.10	$146.11	1.1	13.5	0.2	0.2	0.6	7.4
Large C&I New Construction	Commercial Electric Fryer - Standard	1,937	$0.09	$179.03	1.4	17.4	0.2	0.2	0.8	9.4
Large C&I New Construction	Commercial Electric Griddle	3,549	$0.31	$1,102.50	2.7	31.9	0.4	0.5	1.4	17.3
Large C&I New Construction	Commercial electric steamer	30,488	$0.08	$2,325.32	22.8	273.7	3.8	3.9	12.4	148.5
Large C&I New Construction	Commercial Refrigeration	302,648	$0.46	$139,218.08	219.0	3,285.2	18.7	26.4	100.0	1,500.3
Large C&I New Construction	Comprehensive Design	435,282	$0.47	$204,582.54	183.0	2,928.6	51.1	6.9	83.6	1,337.5
Large C&I New Construction	Compressed Air	2,068,932	$0.39	$808,952.41	1,497.2	22,457.6	201.8	225.0	683.7	10,256.2
Large C&I New Construction	Compressed Air Nozzle	8,250	$0.28	$2,310.00	10.6	159.7	1.0	0.8	4.8	72.3
Large C&I New Construction	Conveyor Broiler - >28" wide	3,319	$0.98	$3,255.00	2.5	29.8	0.4	0.4	1.3	16.2

Large C&I New Construction	Cooling Tower Fan	3,542	$0.31	$1,106.88	3.0	44.7	0.2	0.2	1.4	20.3
Large C&I New Construction	Custom HVAC	1,160,565	$0.54	$626,705.10	839.8	13,437.4	123.6	129.9	383.5	6,136.8
Large C&I New Construction	Deck Oven	59,212	$0.30	$17,718.75	44.3	531.5	7.4	7.6	24.0	288.5
Large C&I New Construction	DHW ECM Pump - <= 1/8 HP	977	$0.39	$382.01	0.7	11.0	0.2	0.2	0.4	5.9
Large C&I New Construction	DHW ECM Pump - <=1/20 HP	1,298	$0.39	$507.52	1.0	14.6	0.0	0.0	0.5	7.9
Large C&I New Construction	DHW ECM Pump - 1/20 to 1/8 HP	1,298	$0.39	$507.52	1.0	14.6	0.0	0.0	0.5	7.9
Large C&I New Construction	DHW ECM Pump - 1/8 to 1/6 HP	1,298	$0.39	$507.52	1.0	14.6	0.0	0.0	0.5	7.9
Large C&I New Construction	DHW ECM Pump - 1/6 to 3/4 HP	1,298	$0.39	$507.52	1.0	14.6	0.0	0.0	0.5	7.9
Large C&I New Construction	DHW ECM Pump - 3/4 to 3 HP	1,298	$0.39	$507.52	1.0	14.6	0.0	0.0	0.5	7.9
Large C&I New Construction	Dishwasher - High Temperature Door Type	2,514	$0.22	$560.21	1.9	28.2	0.3	0.3	1.0	15.3
Large C&I New Construction	Dishwasher - High Temperature Multi Tank Conveyor	1,458	$0.10	$140.05	1.1	21.8	0.2	0.2	0.6	11.8
Large C&I New Construction	Dishwasher - High Temperature Pots and Pans	1,625	$0.90	$1,456.88	1.2	12.2	0.2	0.2	0.7	6.6
Large C&I New Construction	Dishwasher - High Temperature Single Tank Conveyor	6,014	$0.36	$2,161.69	4.5	90.0	0.8	0.8	2.4	48.8
Large C&I New Construction	Dishwasher - High Temperature Under Counter	12,473	$0.29	$3,656.24	9.3	93.3	1.6	1.6	5.1	50.6
Large C&I New Construction	Dishwasher - Low Temperature Door Type	6,600	$0.15	$990.00	4.9	74.1	0.8	0.8	2.7	40.2
Large C&I New Construction	Dishwasher - Low Temperature Single Tank Conveyor	4,012	$0.15	$601.81	3.0	60.0	0.5	0.5	1.6	32.6
Large C&I New Construction	Dishwasher - Low Temperature Under Counter	989	$0.15	$147.58	0.7	7.4	0.1	0.1	0.4	4.0
Large C&I New Construction	Dual enthalpy economizer controls	2,994	$0.09	$275.00	2.7	26.8	1.1	0.0	1.2	12.2
Large C&I New Construction	ECM Pump - <= 1/8 HP	28,718	$0.30	$8,615.40	21.5	322.2	2.8	2.8	11.7	174.9

Large C&I New Construction	ECM Pump - <=1/20 HP	9,572	$0.30	$2,871.60	7.2	107.4	1.3	1.3	3.9	58.3
Large C&I New Construction	Electric HW Spray Valve	20,334	$0.58	$11,692.05	18.2	91.1	0.0	0.0	8.3	41.3
Large C&I New Construction	EMS	103,086	$0.53	$54,532.49	74.6	1,119.0	11.0	11.5	34.1	511.0
Large C&I New Construction	Food Service	4,560	$0.39	$1,782.96	3.3	36.3	0.0	0.0	1.5	16.6
Large C&I New Construction	Freezer Glass Door - <15 ft3	254	$0.53	$133.84	0.2	2.3	0.0	0.0	0.1	1.2
Large C&I New Construction	Freezer Glass Door - 15 to 29.9 ft3	405	$0.48	$193.28	0.3	3.6	0.1	0.1	0.2	2.0
Large C&I New Construction	Freezer Glass Door - 30 to 49.9 ft3	631	$0.19	$118.83	0.5	5.7	0.1	0.1	0.3	3.1
Large C&I New Construction	Freezer Glass Door - >50 ft3	883	$0.20	$178.26	0.7	7.9	0.1	0.1	0.4	4.3
Large C&I New Construction	Freezer Solid Door - <15 ft3	1,260	$1.06	$1,337.26	0.9	11.3	0.2	0.2	0.5	6.1
Large C&I New Construction	Freezer Solid Door - 15 to 29.9 ft3	4,333	$0.67	$2,897.58	3.2	38.9	0.5	0.6	1.8	21.1
Large C&I New Construction	Freezer Solid Door - 30 to 49.9 ft3	10,291	$0.37	$3,804.44	7.7	92.4	1.3	1.3	4.2	50.1
Large C&I New Construction	Freezer Solid Door - >50 ft3	350	$0.51	$178.27	0.3	3.1	0.0	0.0	0.1	1.7
Large C&I New Construction	Freezer, Ultra Low Temperature	44,196	$0.40	$17,681.27	33.1	330.6	5.5	5.7	17.9	179.4
Large C&I New Construction	Hand Wrapper	3,130	$0.07	$220.00	2.3	23.4	0.4	0.4	1.3	12.7
Large C&I New Construction	Heating Hot Water Pump	17,342	$0.31	$5,419.43	14.6	219.1	1.1	1.1	6.6	99.3
Large C&I New Construction	High Efficiency Condensing Units - Floating Head Pressure Control	70,056	$0.29	$20,426.78	52.4	681.2	7.7	6.9	28.4	369.8
Large C&I New Construction	High Efficiency Condensing Units - Scroll Compressor	70,056	$0.29	$20,426.78	52.4	681.2	7.7	6.9	28.4	369.8
Large C&I New Construction	High Performance Contact Conveyor Toaster	1,000	$0.70	$700.00	0.7	9.0	0.1	0.1	0.4	4.9
Large C&I New Construction	Hot Food Holding Cabinet - 3/4	4,599	$0.73	$3,360.00	3.4	41.3	0.6	0.6	1.9	22.4
Large C&I New Construction	Hot Food Holding Cabinet - Full	4,311	$0.35	$1,496.25	3.2	38.7	0.5	0.6	1.8	21.0

Large C&I New Construction	Hot Food Holding Cabinet - 1/2	20,696	$0.59	$12,285.00	15.5	185.8	2.6	2.7	8.4	100.8
Large C&I New Construction	HVAC Fan - Return	17,342	$0.31	$5,419.43	14.6	219.1	1.1	1.1	6.6	99.3
Large C&I New Construction	HVAC Fan - Supply	17,342	$0.31	$5,419.43	14.6	219.1	1.1	1.1	6.6	99.3
Large C&I New Construction	Ice Machine - Ice Making Head	46,914	$0.25	$11,550.00	35.1	315.8	5.9	6.0	19.0	171.4
Large C&I New Construction	Ice Machine - Cont. Remote	5,202	$0.09	$450.00	3.9	35.0	0.7	0.7	2.1	19.0
Large C&I New Construction	Ice Machine - Ice Self Contained	3,220	$0.28	$900.00	2.4	21.7	0.4	0.4	1.3	11.8
Large C&I New Construction	Ice Machine - Remote/Split	7,282	$0.06	$450.00	5.4	49.0	0.9	0.9	3.0	26.6
Large C&I New Construction	LEDS	8,540	$0.33	$2,818.20	7.2	79.7	1.5	0.9	3.3	36.4
Large C&I New Construction	Lighting Controls - Integrated	122,850	$0.23	$28,255.50	104.3	1,147.8	14.2	11.5	41.0	451.2
Large C&I New Construction	Lighting Controls - Exterior	122,850	$0.23	$28,255.50	104.3	939.1	14.2	11.5	41.0	369.1
Large C&I New Construction	Lighting Controls - Street Light Exterior	30,700	$0.22	$6,754.00	26.1	234.7	3.6	2.9	10.2	92.2
Large C&I New Construction	Lighting Systems, Custom	20,613	$0.33	$6,802.29	14.9	163.7	3.1	1.8	8.0	87.8
Large C&I New Construction	Lighting Controls, Custom	43,655	$0.36	$15,715.80	31.5	283.7	6.6	3.7	16.9	152.2
Large C&I New Construction	LOADCOMP-25HP	225,000	$0.28	$63,000.00	290.3	4,354.6	27.1	22.2	131.5	1,973.2
Large C&I New Construction	LOADCOMP-75HP	225,000	$0.28	$63,000.00	290.3	4,354.6	26.2	21.5	131.5	1,973.2
Large C&I New Construction	Low pressure drop filter	8,250	$0.28	$2,310.00	10.6	53.2	1.0	0.8	4.8	24.1
Large C&I New Construction	Make Up Air Fan	2,236	$0.31	$698.78	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	MFHR - Cooling	7,534	$0.39	$2,938.29	5.7	142.6	0.0	0.0	3.1	76.5
Large C&I New Construction	MFHR - DHW	7,534	$0.39	$2,938.29	5.7	85.5	0.0	0.0	3.1	45.9
Large C&I New Construction	MFHR - Heating	7,534	$0.39	$2,938.29	5.7	142.6	0.0	0.0	3.1	76.5

Large C&I New Construction	MFHR - Lighting	7,534	$0.39	$2,938.29	5.7	62.7	0.0	0.0	3.1	33.6
Large C&I New Construction	Motor	69,768	$0.22	$15,348.96	50.5	1,009.7	11.1	9.8	23.1	461.1
Large C&I New Construction	ODP-1200F	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-1200N	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-1200S	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-1800F	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-1800N	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-1800S	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-3600F	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-3600N	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	ODP-3600S	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	Other	60,922	$0.39	$23,820.50	44.1	440.9	5.0	7.1	20.1	201.3
Large C&I New Construction	Packaged Terminal Air Conditioner	52,897	$0.25	$13,224.25	39.6	593.5	3.4	0.0	21.5	322.1
Large C&I New Construction	PEI H2O PUMP - COMM, C	51,081	$0.12	$6,129.72	38.6	578.9	7.5	0.7	20.9	314.2
Large C&I New Construction	Performance Lighting - Tier 1 Exterior	2,396	$0.21	$503.16	2.0	30.5	0.3	0.2	0.8	12.0
Large C&I New Construction	Performance Lighting Tier 2 & 3 Exterior	2,396	$0.21	$503.16	2.0	30.5	0.3	0.2	0.8	12.0
Large C&I New Construction	Prescriptive Lighting - EXT-24/7	54,734	$0.25	$13,683.50	46.5	697.4	6.3	5.1	18.3	274.1
Large C&I New Construction	Prescriptive Lighting - EXT-DUSKDAWN	174,499	$0.21	$36,644.79	148.2	2,223.3	20.2	16.3	58.3	873.9
Large C&I New Construction	Process	1,227,371	$0.34	$417,306.14	888.2	13,322.7	147.6	180.0	405.6	6,084.4
Large C&I New Construction	Process Cooling	318,192	$0.32	$102,457.93	230.3	3,453.9	38.3	46.7	105.2	1,577.4

Large C&I New Construction	Process Exhaust Fan	3,542	$0.31	$1,106.88	3.0	44.7	0.2	0.2	1.4	20.3
Large C&I New Construction	Process, Cool Pump	3,542	$0.31	$1,106.88	3.0	44.7	0.2	0.2	1.4	20.3
Large C&I New Construction	Refrigerated Air Dryer - CAT<100	22,860	$0.28	$6,400.80	32.0	415.4	2.7	2.3	14.5	188.2
Large C&I New Construction	Refrigerated Air Dryer - CAT>400	22,860	$0.28	$6,400.80	32.0	415.4	2.7	2.3	14.5	188.2
Large C&I New Construction	Refrigerated Air Dryer - CAT-200	22,860	$0.28	$6,400.80	32.0	415.4	2.7	2.3	14.5	188.2
Large C&I New Construction	Refrigerated Air Dryer - CAT-300	22,860	$0.28	$6,400.80	32.0	415.4	2.7	2.3	14.5	188.2
Large C&I New Construction	Refrigerated Air Dryer - CAT-400	22,860	$0.28	$6,400.80	32.0	415.4	2.7	2.3	14.5	188.2
Large C&I New Construction	Refrigerated Chef Base - 35" to 54"	1,051	$0.52	$550.00	0.8	9.4	0.1	0.1	0.4	5.1
Large C&I New Construction	Refrigerated Chef Base - 74" to 89"	1,966	$0.28	$544.46	1.5	17.6	0.2	0.3	0.8	9.6
Large C&I New Construction	Refrigerator Glass Door - <15 ft3	2,089	$0.92	$1,918.47	1.6	18.8	0.3	0.3	0.8	10.2
Large C&I New Construction	Refrigerator Glass Door - 15 to 29.9 ft3	6,633	$0.57	$3,781.03	5.0	59.5	0.8	0.9	2.7	32.3
Large C&I New Construction	Refrigerator Glass Door - 30 to 49.9 ft3	12,895	$0.42	$5,372.92	9.6	115.7	1.6	1.7	5.2	62.8
Large C&I New Construction	Refrigerator Glass Door - >50 ft3	2,081	$0.61	$1,279.30	1.6	18.7	0.3	0.3	0.8	10.1
Large C&I New Construction	Refrigerator Solid Door - <15 ft3	1,450	$1.32	$1,919.12	1.1	13.0	0.2	0.2	0.6	7.1
Large C&I New Construction	Refrigerator Solid Door - 15 to 29.9 ft3	4,640	$0.69	$3,184.31	3.5	41.6	0.6	0.6	1.9	22.6
Large C&I New Construction	Refrigerator Solid Door - 30 to 49.9 ft3	2,507	$1.33	$3,325.61	1.9	22.5	0.3	0.3	1.0	12.2
Large C&I New Construction	Refrigerator Solid Door - >50 ft3	1,069	$1.00	$1,066.16	0.8	9.6	0.1	0.1	0.4	5.2
Large C&I New Construction	Room Air Cleaner - K-12	10,950	$0.26	$2,896.28	9.5	85.7	0.3	0.6	4.3	38.8
Large C&I New Construction	Room Air Cleaner - Office	10,950	$0.26	$2,896.28	9.5	85.7	0.3	0.6	4.3	38.8
Large C&I New Construction	Room Air Cleaner - Retail	10,950	$0.26	$2,896.28	9.5	85.7	0.3	0.6	4.3	38.8

Large C&I New Construction	Sensors	10,950	$0.26	$2,847.00	10.6	105.9	4.7	3.7	4.8	48.0
Large C&I New Construction	Split system AC to 5.4 tons	60,836	$0.25	$15,209.07	45.5	682.6	3.9	0.0	24.7	370.5
Large C&I New Construction	TEFC-1200F	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-1200N	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-1200S	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-1800F	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-1800N	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-1800S	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-3600F	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-3600N	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	TEFC-3600S	2,236	$0.29	$648.46	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	Transformers	3,788	$0.40	$1,515.36	2.7	63.1	0.3	0.4	1.3	28.8
Large C&I New Construction	VARICOMP, 75HP	92,176	$0.31	$28,574.60	118.9	1,783.9	10.8	8.9	53.9	808.3
Large C&I New Construction	Vending Miser - Glass Front Refridgerated Coolers	1,320	$0.70	$924.00	1.0	4.9	0.1	0.1	0.5	2.7
Large C&I New Construction	Vending Miser - Non-Refridgerated Snack Vending Machines UPSTR	1,320	$0.70	$924.00	1.0	4.9	0.1	0.1	0.5	2.7
Large C&I New Construction	Vending Miser - Refridgerated Beverage Vending Machines UPSTR	1,320	$0.70	$924.00	1.0	4.9	0.1	0.1	0.5	2.7
Large C&I New Construction	VFD Secondary	2,236	$0.31	$698.78	1.9	28.2	0.1	0.1	0.9	12.8
Large C&I New Construction	VRF HP - 11.25T-20T	457,420	$0.31	$143,217.37	359.3	6,107.4	30.2	0.0	195.0	3,315.0
Large C&I New Construction	VRF HP - 5.4T-11.25T	1,032,719	$0.27	$273,797.55	811.1	13,788.7	68.1	0.0	440.2	7,484.2

Large C&I New Construction	VRF HP - over 20T	21,651	$0.23	$4,914.30	17.0	289.1	1.4	0.0	9.2	156.9
Large C&I New Construction	VSD-Non HVAC	147,747	$0.22	$32,504.25	106.9	1,603.7	23.4	20.8	48.8	732.4
Large C&I New Construction	VSD Compressor (15<=HP<=75)	92,176	$0.22	$20,278.75	118.9	1,546.1	10.7	8.8	53.9	700.6
Large C&I New Construction	Water Source Heat Pump	3,276	$0.50	$1,638.00	2.6	38.6	0.0	0.0	1.4	20.9
Large C&I New Construction	WCChill - over300T_IPLV_CEN	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - over300T_IPLV_SCR	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - over300T_PkkW_CEN	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - over300T_PkkW_SCR	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - to150T_IPLV_CEN	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - to150T_IPLV_SCR	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - to150T_PkkW_CEN	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - to150T_PkkW_SCR	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 150-300T_IPLV	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 150-300T_IPLV_CEN	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 150-300T_IPLV_SCR	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 150-300T_PkKW	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 150-300T_PkKW_CEN	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 150-300T_PkKW_SCR	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 300-1000T_IPLV	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 300-1000T_PkKW	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3

Large C&I New Construction	WCChill - 30-70T	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	WCChill - 70-150T	2,016	$0.30	$604.80	1.9	44.8	0.5	0.1	0.9	20.3
Large C&I New Construction	Zero loss condensate drain	25,982	$0.28	$7,274.84	33.5	502.8	3.0	2.5	15.2	227.8
Large C&I Retrofit	HVAC Fan - Return	127,392	$0.43	$54,778.73	107.3	1,609.4	8.2	8.2	48.6	729.3
Large C&I Retrofit	HVAC Fan - Supply	178,601	$0.43	$76,798.43	150.4	2,256.4	11.5	11.5	68.2	1,022.4
Large C&I Retrofit	Boiler, Draft Fan	133,951	$0.43	$57,598.93	112.8	1,692.3	8.6	8.7	51.1	766.8
Large C&I Retrofit	Boiler, Feedwater Pump	133,951	$0.43	$57,598.93	112.8	1,692.3	8.6	8.7	51.1	766.8
Large C&I Retrofit	Building Exhaust Fan	133,951	$0.43	$57,598.93	112.8	1,692.3	8.6	8.7	51.1	766.8
Large C&I Retrofit	Building operator certification	53,455	$0.00	$0.00	47.9	239.5	0.0	0.0	21.7	108.5
Large C&I Retrofit	Building Shell	30,143	$0.85	$25,621.55	21.8	392.6	0.0	0.0	10.0	179.3
Large C&I Retrofit	Chiller, Water Pump	133,951	$0.43	$57,598.93	112.8	1,692.3	8.6	8.7	51.1	766.8
Large C&I Retrofit	Commercial Refrigeration	361,298	$0.44	$158,971.12	261.5	3,398.9	19.1	38.7	119.4	1,552.2
Large C&I Retrofit	Cooling Town Fan	133,951	$0.43	$57,598.93	112.8	1,692.3	8.6	8.7	51.1	766.8
Large C&I Retrofit	Custom Compressed Air	326,309	$0.10	$32,630.90	236.1	472.3	31.4	44.0	107.8	215.7
Large C&I Retrofit	Custom HVAC	254,382	$0.62	$157,716.84	184.1	1,840.8	37.5	20.1	141.6	1,416.3
Large C&I Retrofit	Custom Motor	55,195	$0.44	$24,285.77	39.9	599.1	6.6	4.7	18.2	273.6
Large C&I Retrofit	Custom Other	145,072	$0.22	$31,915.84	105.0	524.9	9.9	10.3	47.9	239.7
Large C&I Retrofit	Custom process	1,381,367	$0.24	$331,528.08	999.6	12,995.1	165.9	231.0	456.5	5,934.8
Large C&I Retrofit	EMS 5k-40ksqft	586,135	$0.62	$363,403.70	312.0	3,120.3	19.9	27.5	289.7	2,897.0
Large C&I Retrofit	EMS 40k-80ksqft	732,668	$0.57	$417,620.76	390.0	3,900.4	24.8	34.4	362.1	3,621.3
Large C&I Retrofit	EMS 80k-200ksqft	879,202	$0.52	$457,185.04	468.0	4,680.5	29.8	41.3	434.6	4,345.5
Large C&I Retrofit	Energy management system, custom	677,376	$0.43	$291,271.68	490.2	3,431.3	100.0	53.5	223.9	1,567.0
Large C&I Retrofit	Food Service	1,403	$0.37	$519.11	1.0	11.2	0.0	0.0	0.5	5.1
Large C&I Retrofit	Heating Hot Water Pump	178,601	$0.43	$76,798.43	95.1	1,236.0	6.3	8.4	59.0	767.3
Large C&I Retrofit	LEDS	2,431,128	$0.34	$826,583.42	2,061.9	6,185.6	363.5	245.4	941.6	2,824.9
Large C&I Retrofit	Lighting Controls, Custom	5,669	$0.59	$3,344.71	4.8	43.3	1.0	0.6	2.2	19.8

Large C&I Retrofit	Lighting Systems, Custom	1,791,357	$0.37	$662,802.18	1,117.7	3,353.0	223.3	150.7	473.4	1,420.3
Large C&I Retrofit	Make Up Air Fan	92,865	$0.43	$39,931.95	78.2	1,173.2	6.0	6.0	35.4	531.6
Large C&I Retrofit	MTVFD-BLDG EXHST FAN	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-BOIL DRAFT FAN	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-BOIL FWTR PUMP	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-CHIL WATER PMP	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-CT FAN	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-HEAT HW PUMP	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-HVAC RET FAN	71,606	$0.43	$30,790.58	60.3	904.6	10.4	10.4	27.3	409.9
Large C&I Retrofit	MTVFD-HVAC SUP FAN	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-MK UP AIR FAN	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-PROC COOL PUMP	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-WATER/WST PUMP	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	MTVFD-WSHP PUMP	71,806	$0.43	$30,876.58	60.5	907.2	10.4	10.4	27.4	411.1
Large C&I Retrofit	Motor VFD Secondary	160,133	$0.43	$68,857.19	134.9	2,023.1	23.2	23.2	61.1	916.7
Large C&I Retrofit	Non-refrigerated snack vending machine	66,879	$0.50	$33,439.50	62.1	310.4	4.3	4.5	42.1	210.4
Large C&I Retrofit	O & M	770,246	$0.21	$161,751.66	557.4	1,114.8	0.0	0.0	254.6	509.1
Large C&I Retrofit	Prescriptive Lighting - Linear LED - Downstream	2,316,381	$0.34	$787,569.54	1,928.1	5,784.4	671.4	541.7	744.0	2,232.0
Large C&I Retrofit	Prescriptive Lighting - LED - Downstream	5,246,094	$0.34	$1,783,671.96	4,366.8	13,100.3	1,520.5	1,226.8	1,685.0	5,055.1
Large C&I Retrofit	Prescriptive Lighting - LED Replacement	3,055,014	$0.34	$1,038,704.76	2,542.9	7,628.8	885.4	714.4	981.3	2,943.8
Large C&I Retrofit	Process Cooling	151,317	$0.27	$40,855.50	109.5	1,423.5	12.1	16.8	50.0	650.1
Large C&I Retrofit	Process, Cool Pump	133,951	$0.43	$57,598.93	71.3	927.0	4.7	6.3	44.3	575.5
Large C&I Retrofit	Process, Exhaust Fan	133,951	$0.43	$57,598.93	112.8	1,692.3	8.6	8.7	51.1	766.8
Large C&I Retrofit	Refrigerated beverage vending machine	76,911	$0.50	$38,455.43	71.4	357.0	7.6	7.9	48.4	241.9
Large C&I Retrofit	Street lighting - Lighting w/ Controls	56,008	$0.34	$19,042.72	47.5	285.0	0.0	7.1	21.7	130.2

Large C&I Retrofit	Transformers	207,355	$0.35	$72,574.25	150.1	4,051.4	15.5	20.6	68.5	1,850.2
Large C&I Retrofit	UPSTR Lighting - LED Controls	1,685,195	$0.45	$758,337.75	883.7	6,185.8	324.9	225.6	600.9	4,206.0
Large C&I Retrofit	UPSTR Lighting - High/Low Bay Controls	4,002,338	$0.45	$1,801,052.10	2,266.1	18,129.1	833.1	578.7	1,390.9	11,127.4
Large C&I Retrofit	UPSTR Lighting - LED Exterior	3,433,585	$0.10	$343,358.50	554.5	2,772.6	65.8	176.7	1,324.3	6,621.7
Large C&I Retrofit	UPSTR Lighting - LED High/Low Bay	10,290,222	$0.15	$1,543,533.30	5,826.3	17,479.0	2,142.0	1,487.8	3,576.1	10,728.4
Large C&I Retrofit	UPSTR Lighting - LED Stairwell	42,130	$0.33	$13,902.90	26.1	52.1	3.4	2.7	14.7	29.4
Large C&I Retrofit	UPSTR Lighting - Linear LED	452,896	$0.08	$36,231.68	177.4	354.8	26.0	18.0	159.8	319.6
Large C&I Retrofit	UPSTR Lighting - LED Outdoor Control	1,158,572	$0.17	$196,957.24	187.1	1,122.7	22.2	59.6	446.9	2,681.2
Large C&I Retrofit	VARICOMP - 25 HP	163,088	$0.09	$14,677.92	206.0	2,678.5	19.1	15.7	93.4	1,213.7
Large C&I Retrofit	VARICOMP - 75 HP	160,040	$0.09	$14,403.60	202.2	2,628.4	18.8	15.4	91.6	1,191.0
Large C&I Retrofit	VFD Secondary	32,356	$0.43	$13,913.08	17.2	258.4	2.6	3.4	10.7	160.4
Large C&I Retrofit	VSD-HVAC	49,241	$0.36	$17,726.76	35.6	463.2	5.9	4.2	16.3	211.6
Large C&I Retrofit	VSD-Non HVAC	91,344	$0.36	$32,883.84	66.1	859.3	11.0	7.8	30.2	392.4
Large C&I Retrofit	Water Source Heat Pump	79,620	$0.43	$34,236.60	42.4	635.8	2.8	3.7	26.3	394.7
Large C&I Retrofit	Water/Waste Pump	133,951	$0.43	$57,598.93	112.8	1,692.3	19.4	19.4	51.1	766.8
Small Business Direct Install	CUSTOM LIGHTING	832,756	$0.63	$524,636.28	711.1	2,133.2	83.6	67.5	349.9	1,049.8
Small Business Direct Install	Custom Motors/Drives, HVAC	1,584,000	$0.72	$1,140,480.00	1,062.4	13,811.6	114.6	94.5	522.8	6,797.0
Small Business Direct Install	Custom Motors/Drives, Non-HVAC	352,000	$0.72	$253,440.00	236.1	3,069.2	25.5	21.0	116.2	1,510.4
Small Business Direct Install	Freezer Recycling	51,493	$0.30	$15,447.90	21.4	171.0	2.3	1.9	17.4	138.8
Small Business Direct Install	Hot Water, Custom	422,400	$0.72	$304,128.00	283.3	3,683.1	30.6	25.2	139.4	1,812.5
Small Business Direct Install	HVAC, Custom	1,683,000	$0.76	$1,279,080.00	1,128.8	14,674.8	121.8	100.4	555.5	7,221.8
Small Business Direct Install	LED - Exterior HW	372,996	$0.63	$234,987.48	315.4	1,892.5	33.9	24.4	155.2	931.3
Small Business Direct Install	LED - Interior HW	3,897,630	$0.63	$2,455,506.90	3,295.9	9,887.8	354.6	255.1	1,354.0	4,062.0

Small Business Direct Install	LED - Interior SI	359,186	$0.59	$211,919.74	303.7	911.2	32.7	23.5	124.8	374.3
Small Business Direct Install	Refrigerated case LED	5,717	$0.45	$2,572.65	4.8	14.5	0.6	0.5	2.4	7.1
Small Business Direct Install	OCCUPANCY SENSORS	251,826	$0.59	$148,577.34	207.8	1,869.8	23.7	19.1	86.8	781.5
Small Business Direct Install	PROGRAMMABLE THERMOSTATS	73,630	$0.54	$39,760.20	60.7	911.2	5.3	4.4	29.9	448.4
Small Business Direct Install	TIMECLOCKS	174	$0.47	$81.78	0.1	1.3	0.0	0.0	0.1	0.5
Small Business Direct Install	VENDING MACHINES	5,947	$0.26	$1,546.22	4.9	24.5	0.4	0.4	2.4	12.1
Small Business Direct Install	Water Heating	6,842	$0.36	$2,463.12	5.6	39.5	0.5	0.4	2.8	19.4

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Table ~~7~~6. Planned Measures for Gas Commercial and Industrial 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)
Large C&I New Construction	Boiler - 96% AFUE	25	$30.00	$750.00	22.4	448.0	1.5	29.3
Large C&I New Construction	Boiler - 95% AFUE < 300 MBU	19	$30.00	$570.00	17.0	340.5	1.1	22.2
Large C&I New Construction	BOILER RESET 1 STAGE	75	$30.00	$2,250.00	67.2	1,344.0	4.4	87.8
Large C&I New Construction	CODES AND STANDARDS	358	$0.00	$0.00	358.0	7,160.0	20.9	418.9
Large C&I New Construction	Combo Condensing Boiler/ Water Heater - 95% AFUE	1,562	$20.00	$31,240.00	1,399.6	27,991.0	91.4	1,827.5
Large C&I New Construction	Comprehensive Design	327	$40.00	$13,080.00	282.0	4,511.7	18.6	296.9

Large C&I New Construction	Condensing Boiler - <= 300 mbh	415	$30.00	$12,450.00	371.8	7,436.8	24.3	485.6
Large C&I New Construction	Condensing Boiler - 1701+ mbh	331	$30.00	$9,930.00	296.6	5,931.5	19.4	387.3
Large C&I New Construction	Condensing Boiler - 300-499 mbh	56	$30.00	$1,680.00	50.2	1,003.5	3.3	65.5
Large C&I New Construction	Condensing Boiler - 500-999 mbh	720	$30.00	$21,600.00	645.1	12,902.4	42.1	842.4
Large C&I New Construction	Condensing Boiler - 1000-1700 mbh	415	$30.00	$12,450.00	371.8	7,436.8	24.3	485.6
Large C&I New Construction	Condensing Water Heater, 90%MIN 75-800	843	$29.01	$24,455.43	630.6	9,458.5	49.3	739.7
Large C&I New Construction	ERV - Rotary Wheel UPSTR	2,000	$16.55	$33,100.00	1,496.0	22,440.0	117.0	1,755.0
Large C&I New Construction	ERV - Fixed Plate UPSTR	1,400	$19.31	$27,034.00	1,047.2	15,708.0	81.9	1,228.5
Large C&I New Construction	Fryer, Upstream	5,168	$16.60	$85,788.80	3,865.7	46,388.0	302.3	3,627.9
Large C&I New Construction	Gas Oven Upstream- Combination Oven	342	$11.79	$4,032.18	255.8	3,069.8	20.0	240.1
Large C&I New Construction	Gas Oven Upstream - Convection Oven	1,678	$30.81	$51,699.18	1,255.1	15,061.7	98.2	1,178.0
Large C&I New Construction	Gas Oven Upstream - Conveyor Oven	265	$12.44	$3,296.60	198.2	2,378.6	15.5	186.0
Large C&I New Construction	Gas Oven Upstream - Rack Oven	151	$4.97	$750.47	112.9	1,355.4	8.8	106.0
Large C&I New Construction	Griddle, Upstream	76	$14.51	$1,102.76	56.8	682.2	4.4	53.4
Large C&I New Construction	Heat Recovery - Seasonal	2,782	$16.00	$44,512.00	2,196.4	32,946.7	144.5	2,168.0
Large C&I New Construction	Heat Recovery - Year Round	2,782	$16.00	$44,512.00	2,196.4	32,946.7	144.5	2,168.0
Large C&I New Construction	Heat Recovery - All	2,782	$16.00	$44,512.00	2,196.4	32,946.7	144.5	2,168.0
Large C&I New Construction	INFRARED HEATER - LOW INT	2,128	$19.20	$40,857.60	1,906.7	32,413.7	124.5	2,116.3
Large C&I New Construction	Low Flow Cooking Spray Nozzle, Upstream	627	$6.58	$4,125.66	469.0	3,752.0	36.7	293.4
Large C&I New Construction	Other Gas - Seasonal	1,597	$16.00	$25,552.00	1,260.9	15,130.4	83.0	995.6

Large C&I New Construction	Other Gas - Year Round	1,597	$16.00	$25,552.00	1,260.9	16,391.2	83.0	1,078.6
Large C&I New Construction	Other Gas - All	117	$16.00	$1,872.00	92.4	1,385.6	6.1	91.2
Large C&I New Construction	Pasta Cooker, Upstream	981	$16.05	$15,745.05	733.8	8,805.5	57.4	688.7
Large C&I New Construction	Steam boiler	793	$25.00	$19,825.00	626.1	12,521.8	41.2	824.0
Large C&I New Construction	Steamer, Upstream	163	$4.86	$792.18	121.9	1,463.1	9.5	114.4
Large C&I New Construction	WATER HEATER - INDIRECT	291	$21.03	$6,119.73	217.7	3,265.0	17.0	255.4
Large C&I New Construction	Water Heater - On-Demand 90	1,478	$7.79	$11,513.62	1,105.5	18,794.2	86.5	1,469.9
Large C&I New Construction	Water Heating Boiler - 94% TE	10,667	$10.81	$115,310.27	7,978.9	159,578.3	624.0	12,480.4
Large C&I Retrofit	Building operator certification	1,336	$0.00	$0.00	1,197.1	5,985.3	78.2	390.8
Large C&I Retrofit	Custom Other	6,644	$25.00	$166,100.00	5,245.6	78,683.7	345.2	5,177.7
Large C&I Retrofit	Heat Recovery - Seasonal	1,763	$29.00	$51,127.00	1,391.9	20,878.9	91.6	1,373.9
Large C&I Retrofit	Heat Recovery - Year Round	1,763	$29.00	$51,127.00	1,391.9	20,878.9	91.6	1,373.9
Large C&I Retrofit	Heat Recovery - All	1,763	$29.00	$51,127.00	1,391.9	20,878.9	91.6	1,373.9
Large C&I Retrofit	HVAC - Controls and EMS	5,807	$30.00	$174,210.00	4,584.7	45,847.5	301.7	3,017.0
Large C&I Retrofit	HVAC - Equipment	10,870	$30.00	$326,100.00	8,582.1	128,731.4	564.7	8,471.1
Large C&I Retrofit	Operation & Maintenance	15,401	$11.50	$177,111.50	12,159.4	60,797.1	800.1	4,000.7
Large C&I Retrofit	Other Gas - All	281	$32.00	$8,992.00	221.9	3,327.8	14.6	219.0
Large C&I Retrofit	Programmable thermostat	83	$20.00	$1,660.00	74.4	1,115.5	4.9	72.8
Large C&I Retrofit	Steam Trap, Custom - Low Pressure	18,618	$12.00	$223,416.00	18,618.0	55,854.0	1,089.2	3,267.5
Large C&I Retrofit	Steam Trap HVAC - High Pressure	1,452	$22.00	$31,944.00	1,452.0	4,356.0	84.9	254.8
Large C&I Retrofit	Steam Trap HVAC - Low Pressure	1,452	$22.00	$31,944.00	1,452.0	4,356.0	84.9	254.8
Large C&I Retrofit	Ventilation Reduction	3,564	$22.00	$78,408.00	2,813.9	33,766.2	185.2	2,222.0
Large C&I Retrofit	Verified savings	4,026	$22.00	$88,572.00	3,178.6	41,321.9	209.2	2,719.2
Large C&I Retrofit	VSDs - Non-HVAC	7,187	$30.00	$215,622.00	5,674.6	85,119.0	373.4	5,601.2
Large C&I Retrofit	WiFi Thermostat - Heat Only, Custom	396	$23.00	$9,108.00	430.8	6,462.7	23.2	347.5

Large C&I Retrofit	WiFi Thermostat Gas - Cooling and Heating	396	$23.00	$9,108.00	354.8	5,322.2	23.2	347.5
Large C&I Retrofit	WiFi Thermostat Gas - Heating	396	$23.00	$9,108.00	354.8	5,322.2	23.2	347.5
Small Business Direct Install	Building Shell	1,200	$63.75	$76,500.00	879.2	15,825.9	62.3	1,122.2
Small Business Direct Install	DHW	400	$22.50	$9,000.00	293.1	3,516.9	20.8	249.4
Small Business Direct Install	Duct Insulation	1,000	$67.50	$67,500.00	825.0	16,500.0	58.5	1,170.0
Small Business Direct Install	Faucet aerator	1,000	$22.50	$22,500.00	825.0	2,475.0	58.5	175.5
Small Business Direct Install	HVAC - Controls and EMS	25	$18.75	$468.75	18.3	183.2	1.3	13.0
Small Business Direct Install	HVAC - Equipment	964	$18.75	$18,075.00	706.3	10,594.6	50.1	751.3
Small Business Direct Install	Insulation Pipe H2O - Diameter 1.5in	200	$22.50	$4,500.00	165.0	2,475.0	11.7	175.5
Small Business Direct Install	Insulation Pipe H2O - Diameter 2in	200	$22.50	$4,500.00	165.0	2,475.0	11.7	175.5
Small Business Direct Install	Insulation Pipe Steam - Diameter 1.5in	100	$22.50	$2,250.00	82.5	1,237.5	5.9	87.8
Small Business Direct Install	Insulation Pipe Steam - Diameter 2in	100	$22.50	$2,250.00	82.5	1,237.5	5.9	87.8
Small Business Direct Install	Low-flow showerhead	788	$18.75	$14,775.00	650.1	6,501.0	46.1	461.0
Small Business Direct Install	Other, Custom	3,000	$60.00	$180,000.00	2,198.0	32,970.7	155.9	2,337.9
Small Business Direct Install	Pipe/Tank/Duct/HVAC Insulation	100	$22.50	$2,250.00	73.3	1,099.0	5.2	77.9
Small Business Direct Install	Pre-rinse spray valve	788	$18.75	$14,775.00	650.1	3,250.5	46.1	230.5
Small Business Direct Install	Programmable thermostat	1,100	$30.00	$33,000.00	907.5	13,612.5	64.4	965.3
Small Business Direct Install	Salon Nozzle	788	$15.00	$11,820.00	650.1	1,950.3	46.1	138.3
Small Business Direct Install	WiFi Thermostat - cooling and htg	25	$21.00	$525.00	20.6	309.4	1.5	21.9
Small Business Direct Install	WiFi Tstat-heat only	25	$21.00	$525.00	20.6	309.4	1.5	21.9
C&I Multifamily	Air Sealing	122	$100.00	$12,200.00	83.0	1,659.2	7.1	142.7

C&I Multifamily	Faucet aerator	6	$5.00	$30.00	1.0	3.0	0.1	0.2
C&I Multifamily	Heating, Custom	2,902	$163.00	$473,026.00	2,902.0	43,530.0	169.8	2,546.5
C&I Multifamily	Hot Water, Custom	514	$176.00	$90,464.00	514.0	9,252.0	30.1	541.2
C&I Multifamily	Low Flow Showerhead	102	$25.00	$2,550.00	111.0	1,664.8	7.0	104.7
C&I Multifamily	MF Shell Insulation	350	$140.00	$49,000.00	238.0	5,950.0	20.5	511.9
C&I Multifamily	Pipe Wrap (Water Heating)	120	$3.00	$360.00	15.1	195.9	0.9	12.3
C&I Multifamily	Programmable thermostat	16	$125.00	$2,000.00	12.1	229.6	1.5	28.7

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Page 9: [11] Commented [RIE4R2] **RI Energy** **7/30/2024 3:27:00 PM**

Some small business customers are already segmented by industry (restaurants, schools) when the measures found in these businesses differ from business customers with a more "boilerplate" list of measures (day care centers, barbershop).

I believe we have focused on grouping businesses based on end uses so that the vendor delivering services can provide cost-effective installation services (e.g. buying equipment in quantity) at scale.

Will be good to track the progress in MA to see if this delivers greater savings at lower quantities.

Finally, 2023 data showed that 7 out of 10 participants use less than 100,000 kWh per year ("micro-businesses) so the program has been effective at delivering services to small business customers at scale and cost-effectively.

Page 9: [12] Commented [DM5] **Dan Mellinger** **8/20/2024 1:07:00 PM**

The Plan refers to both upstream and midstream, interchangeably. The Company should standardize on the channel name. Midstream is most commonly used terminology elsewhere, and is more accurate in terms of the point of delivery.

Page 9: [13] Commented [RIE8R2] **RI Energy** **9/6/2024 10:49:00 AM**

At this point, most of the known refinement around BAP center on marketing to customers (e.g. updating marketing materials, producing a compelling case study with a RI customer, and holding BAP webinars). As we continue to see increased participation, we will certainly account for lessons learned and any programmatic enhancements that should be implemented.

Page 9: [14] Commented [DM10] **Dan Mellinger** **8/20/2024 1:16:00 PM**

This is confusing, since the sentence describes using past energy efficiency participation data. Maybe break this bullet into two parts: using consumption data to target all customers (especially non participants); and using past EE participation data to target and drive repeat engagement with past participants.

Page 10: [15] Commented [RIE14R2] **RI Energy** **7/30/2024 3:29:00 PM**

Yes, something we can address in the C&I Sector calls. For example, we have made some modifications to the webinar series after the first webinar so that each webinar attendee will be contacted for follow up after the webinar. Similarly, the webinar introduction will be sent from the account manager serving the school segment. And finally we have added an incentive "kicker" for attendees who then install EMS measures.

Page 10: [16] Commented [AC15]	**Adrian Caesar**	**6/7/2024 1:51:00 PM**

Seems like these should be separate bullets

Page 10: [17] Commented [AC16]	**Adrian Caesar**	**6/7/2024 1:53:00 PM**

Good. I know the WFD section mentions clean energy internships and other efforts, but wondering if trade ally diversification is a consideration here. The Specialist should also look to engage trade allies from different backgrounds

Page 10: [18] Commented [RIE16R2]	**RI Energy**	**7/30/2024 3:30:00 PM**

There is definitely overlap between WFD and a resource that focuses on engaging with trade allies but the role is focused on, for example, increasing awareness of our New Construction Program with architects and engineers as well as hearing from these stakeholders how we can improve the program and process. But, this person will also engage with trade allies from different backgrounds. So, for example, A&E groups comprised of minorities or women-owned.

Page 10: [19] Commented [RIE17R3]	**RI Energy**	**9/6/2024 10:51:00 AM**

We have not yet decided how this position can be best staffed, whether as an internal or external position. And stating, possibly the obvious, this new position is contingent on the conclusion of the state-wide RFP.

Page 10: [20] Commented [DM17R2]	**Dan Mellinger**	**8/20/2024 1:25:00 PM**

I agree! Will this be an internal staff position?

Page 10: [21] Commented [RIE18R2]	**RI Energy**	**7/30/2024 3:32:00 PM**

Good catch. Added commissioning firms to this bullet. There's likely some overlap between what's being proposed with the Trade Ally position and the changes/outcomes from the NC process evaluation and subsequent reforms

Page 10: [22] Commented [j18] jen 6/20/2024 2:09:00 PM

Suggest including commissioning firms either under the auspices of this position or of whomever coordinates with the design community. However you want to push the EBCx side in addition to NC.

Page 10: [23] Commented [DM19] Dan Mellinger 8/20/2024 1:58:00 PM

"Mercury Reduction And Education Act" with a footnote to https://webserver.rilegislature.gov/BillText/BillText23/SenateText23/S1119.pdf

Page 17: [24] Commented [RIE29R2] RI Energy 9/6/2024 10:53:00 AM

A key part of our customer commitment is meeting the requirements of ASHRAE 90.1-2016, para. 8.4.3 related to metering and data storage and provide necessary post occupancy data to Rhode Island Energy at the end of an agreed-upon one-year post occupancy period.

Once the building is functioning in a steady state, the customer and Rhode Island Energy agree to begin the Performance Period, which will last for one year. At the end of the Performance Period, the customer is responsible for supplying post occupancy energy usage data for Rhode Island Energy to review.

The Performance Period as it relates to the post occupancy incentive will begin once the customer affirms:

• The metering system is set up and operating properly per ASHRAE 90.1-2016, para. 8.4.3. The system shall be capable of maintaining all data collected for a minimum of 36 months.

• All significant corrective action the customer intends to take has been completed.

• The occupancy and use of the building have reached a "steady state."

Customer shall supply Rhode Island Energy with the following at the end of the Performance Period:

• Final commissioning report, if available.

• Electrical energy usage for the following loads shall be recorded and reported to Rhode Island Energy on at least an hourly, daily, monthly, and annual basis for the one-year period (Exception – up to 10% of the load for each of the following categories (b) through (e) shall be allowed to be from other electrical loads: Total building electric energy; interior lighting; receptacle circuits; HVAC systems; Exterior lighting; On-site generation

• Energy use from non-electrical sources (e.g., gas or propane for space heating, cooking, hot water, etc.) must be recorded and reported at least monthly (or if using delivered fuels, as often as deliveries are made) and annually for the same one-year period as for the electrical usage.

• All data shall be provided in either an Excel or CSV format.

Page 18: [25] Commented [j32] jen 8/13/2024 1:56:00 PM

There are small high performance buildings. Could the plan please clarify how the Company works with projects 20k Sq ft or smaller that are looking to be ZNE ready or at least high performance? We realize the economics may be more challenging for these projects, but the first net zero commercial projects that I was involved with were under 20k sq ft.

Page 24: [26] Commented [AC47R2] Adrian Caesar 8/23/2024 11:43:00 AM

I'd ask the vendor if they have any knowledge of a program focused on this in Delaware.
https://dnrec.delaware.gov/climate-coastal-energy/efficiency/cool-switch/guidelines/

Page 24: [27] Commented [AC48] Adrian Caesar 6/7/2024 2:41:00 PM

And other low GWP refrigerants. Natural refrigerants such as CO2 and ammonia are the lowest, but there are some non-natural refrigerants that can meet/exceed the EPA requirements.

Page 24: [28] Commented [RIE48R2] RI Energy 7/30/2024 3:37:00 PM

Good points – a complicated end use given the range between natural and non-natural refrigerants, the new regulations, and costs to change out systems to accommodate natural refrigerants. Causing some chains – according to our vendor -- to take a "wait and see" approach in the short-term.

Page 43: [29] Commented [j79] jen 8/15/2024 3:13:00 PM

This is great. It would be good to understand more about it. How many customers are there and what will be the approach? This is highly cost effective for customers to change out and will deliver good savings.

Page 43: [30] Commented [AC79R2] Adrian Caesar 8/23/2024 11:49:00 AM

Adding a data-related question to this, but how will this be reflected in the Plan numbers? Are there already planned quantities included in the BCR models? Is this blended into the Custom HVAC measures?

Page 43: [31] Commented [RIE79R3] RI Energy 9/6/2024 12:03:00 PM

Yes, the heat pump measure is currently included in the CUSTOM HVAC measure with the intent of moving it in i-ENERGY to its own MEASURE and adding to TRM.

Page 48: [32] Commented [RIE85R2] RI Energy 7/30/2024 3:52:00 PM

For C&I:

- RIE onboarded a marketing contractor focused on the C&I programs

- RISE and the RIE contractor are engaging with organizations that support minority-owned businesses

- RIE is looking to reduce costs when possible to better align program costs with the benefit streams emphasized by the PUC.

Therefore, at least for now, RIE is not looking to engage the Consumer Advocate, especially until we have greater confidence that their work overlaps with business customers. Much of the Consumer Advocate work is focused on assisting residential customers with paying their energy bills (establishing a payment plan).