# Rhode Island Energy

# 2024 -2026 Energy Efficiency Three-Year Plan



~~Dear EERMC Councilmembers and Energy Efficiency Technical Working Group Members,~~

~~Rhode Island Energy (the Company) is happy to present this updated draft of the 2024-2026 Energy Efficiency Three-Year Plan (this Draft), including preliminary savings goals, budgets, and tables. The Company requests that reviewers provide any written input on the contents of this Draft by July 21, 2023, with an expectation that those comments will inform the subsequent drafts of the 2024-2026 Energy Efficiency Three-Year Plan.~~

~~When reviewing this Draft, please note the following: This Draft should not be considered as a complete list of topics that will be addressed in the final version of the 2024-2026 Energy Efficiency Three-Year Plan, nor is this Draft binding. Subject to further discussions with stakeholders, analysis during the planning process, and the outcome of proposed changes to the Least Cost Procurement (LCP) Standards, content included here may be modified. The Company may refine and consolidate the text and structure to make a more readable and accessible final document.~~

~~In addition to providing Plan goals and budgets, Rhode Island Energy has also added or augmented the following Plan sections:~~

- ~~1.2 The Planning Process~~
- ~~2. Least Cost Procurement Laws and Standards~~
- ~~3.3 Multiyear Strategies~~
- ~~3.2.5 Ensure Workforce Capacity to Serve Customers~~
- ~~3.2.6 2024-2026 Efficiency Plan Program Updates~~
- ~~3.4 Coordination with Other Programs and Policies~~
- ~~3.5 Evaluation Plans~~
- ~~5.1 Proposed Performance Incentive~~



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~~We look forward to working together to build and deliver on a three-year energy efficiency plan that will continue to keep Rhode Island at the forefront of energy efficiency and deliver Rhode Island consumers innovative, cost-effective energy services.~~

| ~~Date~~ | ~~Milestone~~ |
|---|---|
| ~~April 6~~ | ~~3YP outline memo shared with EERMC and EE TWG~~ |
| ~~April 20~~ | ~~Present 3 Year Plan to EERMC~~ |
| ~~April 27~~ | ~~3YP outline memo stakeholder comment period ends; Present 3YP outline memo to EE TWG~~ |
| ~~June 1~~ | ~~Draft 3YP narrative shared with stakeholders~~ |
| ~~June 29~~ | ~~Draft 3YP narrative stakeholder comment period ends.~~ |
| ~~June 30~~ | ~~Draft 3YP numbers and updated 3YP narrative shared with stakeholders~~ |
| ~~July 21~~ | ~~Draft 3YP numbers (stakeholder comment period ends)~~ |
| ~~September 7~~ | ~~Second/Final Draft of 3YP due to stakeholders~~ |

*~~Table 1. Three-Year Plan (3YP) Timeline for Stakeholder Involvement~~*




~~Business Use~~

## Table of Contents



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# Pre-Filed Testimony

~~The Company will pre-file testimony with the Plan that addresses the cost-effectiveness of the Plan, prudency, reliability, environmental responsibility, and the cost of additional supply compared to the Plan.~~

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# Executive Summary

~~The~~ In fulfillment of the Comprehensive Energy Conservation, Efficiency and Affordability Act of 2006, the Narragansett Electric Company d/b/a Rhode Island Energy (RI Energy or the Company) is proud to submit this *2024-2026 Three-Year Energy Efficiency and Procurement Plan* (2024-2026 Plan or Plan). The Plan presents an overview of the Company's approaches, program enhancements and strategic innovations planned for the 2024-2026 term. Within this Plan, the Company provides details regarding the cost effectiveness of energy efficiency programs and strategies, how these efforts achieve prudency and reliability, and offers a funding plan with illustrative budgets, funding sources and savings goals.

The 2024-2026 Plan guides annual program planning to secure energy and cost savings for Rhode Island energy consumers. Energy efficiency supports safe and reliable utility service while at the same time helping to reduce ~~our customer's~~customers' carbon footprints. The efficiency programs outlined in this ~~plan~~Plan will contribute positively to overall customer satisfaction, a key priority for both ~~Rhode Island~~RI Energy and its parent corporation, PPL. ~~As this Three-Year~~Since the 2024-2026 Plan is submitted concurrently with the *2024 Annual* ~~Plan,~~*Energy Efficiency and Procurement Plan* (2024 Annual Plan), the Company will use ~~the Three-Year Plan~~this three-year plan document as a roadmap.

The Company will consider relevant developments between the approval of this ~~Three-Year~~ Plan and the submission of the 2025 and 2026 Annual Plans~~, when developing the detailed Annual Energy Efficiency Program Plans and~~ to determine the associated binding savings goals and budgets for ~~those~~ the 2025 and 2026 program years.

~~This Three-Year Plan presents an overview of ongoing efficiency programs and strategies, as well as planned program enhancements and innovations. The Plan details the cost-effectiveness of programs and strategies, explains how it achieves prudency and reliability, and offers a funding plan with illustrative budgets, funding sources, and savings goals. The Three-Year Plan~~ In this Plan, the Company proposes a strategic set of programs and strategies that are ~~both~~ flexible~~ and~~, targeted~~,~~ and geared toward ~~five key approaches across the Company's~~ the Commercial and Industrial (C&I), Residential, and Income Eligible ~~Service (IES)~~ sectors~~:~~

- ~~**Reach more customers: Deliver optimized, tailored programs.**~~
- ~~**Help customers find the right measures: Implement a comprehensive approach to the next generation of efficiency measures.**~~

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- ~~**Enable customers to invest in efficiency: Enhance financing options and**~~. The Company's 2024-2026 key customer ~~**awareness of complementary funding sources.**~~-centric priorities are illustrated below:

  - ~~**Serve customers equitably: Design programs with a conscious effort to serve low- and moderate-income; gender, racially and ethnically diverse; and non-native English-speaking customers.**~~
  - ~~**Ensure workforce capacity to serve customers.**~~

~~The Company continues to seek~~

## Five Key Priorities

| | | | | |
|---|---|---|---|---|
| Deliver optimized, tailored programs that serve all customers and **increase program reach** | Understand customer needs, planning cycles, and goals to optimize incorporation of the **next generation of efficiency measures** | Enhance financing options, simplify offerings, and raise customer awareness of complementary funding sources that can be leveraged to **enable customers to invest in efficiency** | **Serve customers equitably** by designing programs with a conscious effort to serve small business and low- and moderate-income; gender, racially and ethnically diverse; and non-native English-speaking customers | **Increase workforce capacity** to serve customers and implement energy efficiency |

RI Energy continuously seeks new opportunities to drive deeper savings and transform additional markets~~.~~, particularly those that are underserved. Many of the Plan's strategies ~~in this Plan~~ build upon existing customer relationships to incentivize comprehensive measures that accrue greater savings over their lifetime~~.~~; however, the Company is always looking for new ways to reach new markets. The Company must also go deeper and broader to secure the next unit of efficiency. This increase in energy savings will only be realized by encouraging continuous, multi-year customer engagement that increases opportunities for comprehensive savings through the installation of multiple efficiency measures, including new and emerging technologies.

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# ~~1.~~Section One: Introduction

## 1.1 Plan Summary

~~Rhode Island Energy (Rhode Island Energy or the Company) submits this 2024-26 Three-Year Energy Efficiency and Conservation Procurement Plan (Three-Year Plan or Plan), alongside the 2024 Annual Energy Efficiency and Conservation Procurement Plan (Annual Plan), in fulfillment of the Comprehensive Energy Conservation, Efficiency and Affordability Act of 2006.~~

~~This 2024-2026 Three-Year Plan is filed in combination with the Annual Plan. This Three-Year~~This Plan outlines the Company's overall programmatic focus and strategies, including illustrative and provisional budgets and savings goals for the next three years of efficiency program implementation~~[1]. It~~. The document lays out a vision for ~~Rhode Island Energy's~~the Company's continued transformation of the energy efficiency sector in Rhode Island, including key ~~themes and areas of focus~~approaches for the 2024-2026~~. It~~ term, consistent and effective service designs, creative and effective engagement strategies, and accessible and widespread program delivery.

This Plan will serve as a guide for the Company's annual ~~energy efficiency and conservation~~ plans and ~~provide~~provides the focus, approaches, and long-term strategies ~~over the three years of program implementation~~ to deliver energy and cost savings for Rhode Island consumers ~~and~~ , as well as provide operational benefits for ~~Rhode Island's~~the state's electric and natural gas systems. The 2024 Annual Plan ~~utilizes that~~uses this high-level vision to detail the ~~plan~~specific strategies planned for the 2024~~,~~ program year, including formalizing budgets and savings goals associated with time tested programming, while outlining program enhancements and innovations. The Company will use this 2024-2026 Plan as a roadmap to guide the planning process for the 2025 and 2026 Annual Plans. Additionally, the Company will also consider developments (e.g., new technologies, updated building and/or appliance standards) that may arise between the Plan's approval and the submission of the 2025 and 2026 Annual Plans in determining if modifications are needed for program designs, savings goals and budgets for those years.

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~~The Company intends for the three-year plan to satisfy the statutory requirements for Least Cost Procurement (LCP) and will be consistent with the concurrently filed 2024 Annual Energy Efficiency Procurement Plan~~

~~[1] As a reminder, this initial draft narrative does not include any numbers. Those will be provided by July 30, 2023.~~

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~~(Annual Plan). The~~The overarching goal of ~~both~~energy efficiency plans is to enable Rhode Island energy consumers to ~~meet~~save money, reduce their energy ~~needs~~consumption and protect the environment through cost-effective, reliable, prudent, and environmentally responsible ~~energy~~ efficiency~~.~~

programs. Efficiency ~~programming enables~~programs enable the Company to maintain system reliability and ~~contributes~~contribute to ~~statewide~~the state's goals for reducing greenhouse gases and decarbonizing the economy. Energy efficiency generates a host of non-energy environmental ~~and~~, health and societal benefits ~~for customers and society. The Three-Year~~. The Plan proposes illustrative and provisional energy efficiency procurement budgets and savings goals that will help ~~guide annual energy efficiency and conservation plans and provides the strategies for the three years of program implementation that will help~~ Rhode Island ~~Energy~~ consumers meet ~~a portion of~~ their energy needs ~~through energy efficiency~~.

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~~As this Three-Year Plan is submitted concurrently the 2024 Annual Plan, the Company will use the Three-Year Plan as a roadmap, while also considering developments between the approval of this Three-Year Plan and the submission of the 2025 and 2026 Annual Plans, in developing the more detailed Annual Energy Efficiency Program Plans and associated binding savings goals and budgets for those years.~~

RI Energy's 2024-2026 Plan satisfies the statutory requirements of Least Cost Procurement (LCP), is consistent with the concurrently filed 2024 Annual Plan, and is fully aligned with priority actions and reducing greenhouse gas emissions per the 2021 *Act on Climate* and *2022 Update to the 2016 Greenhouse Gas Emissions Reduction Plan* (2022 Climate Update).

## 1.2 The Planning Process

~~This Three-Year Plan was~~ The Company developed this Plan in collaboration with a number of stakeholders and entities ~~that~~who have historically ~~joined the Company in providing~~provided valuable guidance and feedback. ~~These entities make up the Energy Efficiency Technical Working Group (EE TWG) and include the Rhode Island Division~~The figure below describes the membership of ~~Public Utilities and Carriers (Division or DPUC), Acadia Center, the Rhode Island Office of Energy Resources (OER), Green Energy Consumer's Alliance, the Energy Efficiency~~ each of three key stakeholder groups. The Energy Efficiency and Resource Management Council (EERMC~~), the City~~) provides critical oversight of ~~Providence, the George Wiley Center, the Center for Justice, and the Rhode Island Infrastructure Bank. The Company~~ program design, implementation and evaluation. Once a month, the Company hosts the Energy Efficiency Technical Working Group (EE TWG ~~monthly as a forum~~) for an in-depth discussion of energy efficiency topics and also engages the EE TWG throughout the planning process to leverage their expertise and seek their feedback. ~~The influx~~In

Formatted: Normal, Right: 0", Space Before: 0 pt addition, the Energy Efficiency Equity Working Group (EE EWG) convenes to provide the Company with recommendations on incorporating equity in the planning, design and delivery of ~~federal funding allocated to RI by the federal Inflation Reduction Act (IRA) necessitates that the Company continue to work closely with other stakeholders, especially OER, to right size incentive levels and design~~its energy efficiency programs ~~that complement other available incentives throughout the upcoming three-year period~~.

## Robust Stakeholder Input

### Energy Efficiency and Resource Management Council (EERMC)

Members represent:

- Small commercial and industrial users
- Expertise in energy design and code
- Expertise in environmental issues
- Small non-profit institutions
- Large commercial and industrial users
- Large non-profit institutions
- Energy regulation and law
- Low-income users
- Municipalities
- Residential users

### Energy Efficiency Technical Working Group (EE TWG)

- Rhode Island Division of Public Utilities and Carriers
- Rhode Island Office of Energy Resources
- Rhode Island Infrastructure Bank
- Rhode Island Energy Efficiency and Resource Management Council
- Acadia Center
- Center for Justice
- City of Providence
- George Wiley Center
- Green Energy Consumers Alliance

### Energy Efficiency Equity Working Group (EE EWG)

- Green and Healthy Homes Initiative
- Rhode Island Office of Energy Resources
- HousingWorks Rhode Island
- Prospect Health Systems
- Community Action Partnership of Providence County
- RI EERMC
- Rhode Island Builders Association
- Optimal Energy / NV5
- CLEAResult

Throughout the ~~Three-Year~~2024-2026 Plan development process, ~~Company~~the Company's staff have collaborated with the EERMC ~~consultant team~~ and the Rhode Island Office of Energy Resources (OER) to identify measures and strategies ~~that inform this Three-Year Plan.~~. The Company appreciates the ~~effort~~efforts made by both the EERMC and their consulting team to include Company feedback in the development of their priorities. ~~-~~The ~~company~~Company considered EERMC, OER, and other stakeholder priorities in developing this ~~plan~~Plan, alongside market assessment and evaluation activities; quality assurance insights; feedback from subcontractors and participants; input from businesses, professional and trade associations, trade allies, and others; and insights from national and regional energy efficiency experiences of peer administrators.



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~~In addition to EE TWG technical experts, the Company solicits feedback from vendors and customers to inform energy efficiency planning and implementation. This includes listening forums, surveys, results of Evaluation, Measurement, and Verification studies, and EERMC public meetings and comment periods. The Company coordinates with internal policy and system planning resources to ensure energy efficiency programs support operational effectiveness and further statewide goals.~~

In the 2024-2026 period, the expected influx of federal funding allocated to Rhode Island by the federal *Inflation Reduction Act of 2022* (IRA) will necessitate that the Company continue to work closely with other stakeholders, especially OER, to set incentive levels and make program modifications to support and leverage these additional funding sources throughout the 2024-2026 term. The Company will assess program incentives due to the presence of federal funding or other sources and will continue to work with OER to accelerate the adoption of energy efficiency.

### 1.2.1 Collaboration and Stakeholder Feedback

#### Customer Listening Sessions

The Company hosted three listening sessions with customers in June 2023~~. A session for Commercial and Industrial~~ including one for C&I customers (June 20), one for income-eligible customers ~~was held on June 20th, one for Income Eligible Customers on~~ (June ~~22nd,~~22), and one for ~~Residential Customers on~~ residential customers (June ~~27th.~~ 27). The Company solicited participants through outreach to EERMC and ~~EETWG~~EE TWG members~~, including, for example,~~ (e.g., OER and the ~~RI~~Rhode Island Center for Justice), as well through communication with ~~Community Action Agencies, Chambers of Commerce~~community action agencies, chambers of commerce, program contractors, and other local organizations and networks.

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Each listening session began with an overview of the Company's energy efficiency programs ~~in Rhode Island. Following that, participants joined~~followed by smaller break-out groups where ~~they~~customers could provide candid feedback on their experience, if any, with the Company's efficiency programs and offer suggestions on how to best increase awareness of the programs. Following the break-out ~~sessions~~groups, a Company representative ~~from Rhode Island Energy~~ presented an overview of the Plan, including proposed changes and enhancements. Participants offered their

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thoughts on the draft Plan and ideas for the ~~company~~Company to consider ~~during~~. Some of the ~~planning cycle~~[2] ~~.~~key takeaways that have informed this Plan include:

- Continued effort at refining and diversifying outreach efforts is necessary. Customers who participated in programs had almost universally positive experiences, but each session offered suggestions for increasing awareness of program offerings.
- Feedback regarding future incentives for gas was split. While some customers asked about incentives for switching from natural gas to electricity, others expressed concern about losing, or the lack of current, access to natural gas.
- Several participants suggested that RI Energy work more closely with community-based organizations to increase awareness of programs.

For further information regarding these listening sessions, please see Attachment 5.

## Vendor Input

The Company also engages its program vendors to solicit their input ~~on program design. Monthly~~by holding monthly calls ~~are held~~ with ~~Project Expediters~~project expediters, the most-active ~~Commercial and Industrial~~C&I program vendors. When ~~soliciting~~the Company solicited feedback on ~~this Three-Year~~the Plan development process, the following statements were made by various program vendors:

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- Vendors support the efforts to decarbonize buildings, in an affordable manner for customers.
- Some vendors prefer to continue to allow customers to have choices in the fuel types of equipment they procure, while promoting the most-efficient option possible.
- Some customers, particularly schools, have trouble electrifying their facilities due to cost and resource barriers.

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~~2 Feedback from these sessions will be compiled and included as an attachment in subsequent plan drafts.~~

## Market Potential Study Refresh

This ~~Three-Year~~ Plan is informed by the Rhode Island Energy Efficiency Market Potential Study Refresh (MPS Refresh) commissioned by the EERMC and completed by Dunsky Energy Consulting in early 2023. The EERMC managed the study, with input from ~~Rhode Island~~RI Energy and other stakeholders. The results of this study were used by the EERMC to recommend energy savings ~~Targets~~targets for the ~~three-year period~~2024-2026 term.

## Engagement with State Climate Planning

To further inform ~~subsequent~~future annual plans, specifically the 2025 and 2026 Annual Plans, the Company will participate in ~~the~~future Executive Climate Change Coordinating Council (EC4) stakeholder sessions ~~to~~. These sessions will help the Company understand policy priorities and actions ~~so the Company can~~that should be taken into account ~~for those actions~~ in program planning and design~~.~~ for the 2025 and 2026 program years. The EC4's *2022 Update* to the *2016 Greenhouse Gas Emissions Reduction Plan* identified energy efficiency as a priority action and directed the state to continue work in this space. Per this guidance, the Company continues to pursue energy savings under the least cost procurement framework and reporting on progress.

For Rhode Island's 2025 Climate Strategy, RI Energy stands ready to support work to evaluate economy wide decarbonization scenarios and advocate for an appropriate level of energy efficiency in that context. The Company has submitted comments in response to the EC4's Request for Information for the Strategy's scope of work and anticipates more engagement as the EC4 begins developing the *2025 Climate Strategy* in earnest. By accounting for ~~these~~EC4 policy priorities and actions, ~~we~~the Company will avoid duplication of efforts, ~~right size program spending,~~ maximize program impacts, and ensure ~~plan agreement~~Plan alignment with the development of the anticipated 2025 Climate Action Strategy.~~.~~

## ~~The Company participates in several dockets and processes that~~Cross-Functional Coordination

RI Energy coordinates across all its business activities, including its infrastructure investment planning, customer programs, and regulatory policy, all of which have the potential to impact energy efficiency planning and strategy. ~~I~~In 2022, ~~Rhode Island Energy~~the Company filed its Advanced Metering Functionality (AMF) Business Case and its Grid Modernization Plan~~, and the Public Utilities Commission opened its~~. Since 2022, the Company has been engaged in the Commission's Future of Gas docket~~.~~ (Docket No. 22-01-NG) and its investigation into energy storage (Docket No. 5000). Throughout the planning process, the Company coordinated with internal policy and system planning resources

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**Commented [RIE1]: Susan AnderBois:** Can you be more specific. Is RIE attending the regular EC4 meetings that are held by DEM/EC4Chair Terry Gray? Or the EC4 Advisory Board meetings? Or just any meetings they rae holding to solicit input from stakeholders specific to the 2025 plan? There are a lot of EC4 engagements, so I think it would be helpful to know if it's general engagement/learning or in forums where RIE might be advocating for specific positions from EC4 in their planning process. (basically: are you there to learn or advocate – or some combination of the two).

**Commented [RIE1R2]:** Thanks Sue. Added additional detail to the text.

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**Commented [RIE2]: Adrian Caesar:** This is a good step, though would like to see more about *how* the Company will work with the EC4 (beyond participating meetings) to determine what constitutes compliance.

... [1]

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to ensure the Plan's energy efficiency programs support operational effectiveness and further statewide decarbonization goals.

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The Company also revitalized ~~the~~its System Reliability Procurement (SRP) Technical Working Group, an external stakeholder group that advises ~~Rhode Island~~RI Energy on matters related to system reliability procurement. ~~Additional detail about Rhode Island Energy's activities in 2022 related to~~[3] Going forward, per the updated LCP Standards, demand response programs will be presented as part of the system reliability procurement~~, including assessment of non-wires solutions~~ and ~~advancements in non-pipes solution program development, can be found in Rhode Island Energy's *2022 System Reliability Procurement Year-End Report* (filed with the Public Utilities Commission on June 1, 2023). The Company staff responsible for~~not addressed in the energy efficiency planning process (i.e., not in the Three-Year Energy Efficiency and Procurement Plans or Annual Plans). The Company's efficiency team regularly communicates with colleagues engaged in ~~these~~SRP efforts to understand potential interactions and plan accordingly.

## 1.3 How to Read This Plan

For ease of review, this Plan has been organized to align with the ~~Least Cost Procurement (~~LCP~~)~~ Standards. There are ~~three~~four overarching sections: ~~LCP Standards, Priorities and Programs, Goals, Budget, and Funding Plan; and Analysis of Total Rhode Island Energy Efficiency.~~

(1) The *LCP Standards* section explains how the Plan complies with the requirements ~~for~~set forth in the LCP Standards: cost-effectiveness, reliability, prudency, environmentally responsible, and comparison to alternative cost of supply requirements~~, as set forth in the LCP Standards.~~.

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(2) The *Priorities and Programs* section provides insight into strategic considerations, high-level program descriptions and the Company's approach to implementing the principles of program design outlined in the LCP Standards. This section also includes a discussion of program coordination with other energy programs. Goals, Budget, and Funding Plan

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(3) The *Goals, Budget, and Funding Plan* section details these elements and discusses the performance incentive plan and performance metrics. ~~**Analysis of Total Rhode Island Energy Efficiency,** a new component of the Three-year plan per the revised Standards adopted in Docket 23-07-EE, contains an analysis of total energy~~

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[3] Additional details regarding the Company's activities in 2022 related to system reliability procurement, including assessment of non-wires solutions and advancements in non-pipes solution program development, can be found in Rhode Island Energy's *2022 System Reliability Procurement Year-End Report* (filed with the PUC on Jun. 1, 2023).

~~likely to be saved in Rhode Island through energy efficiency over the three years, and the portion of those total energy savings that will be delivered by the Company's EE programs.~~

(4) The *Analysis of Total Rhode Island Energy Efficiency* section, a new component of the Plan per the revised LCP Standards adopted in Docket 23-07-EE, contains an analysis of the total energy expected to be saved in Rhode Island through energy efficiency during the 2024-2026 term, and the portion of those total energy savings that will be delivered by the Company's energy efficiency programs.

There are ~~four~~five attachments ~~to this Three-Year Plan~~ which provide additional detail ~~on~~regarding specific Plan elements:



- Attachment 1: Energy Efficiency Funding
- Attachment 2: Program Level Benefit Cost Summary
- Attachment 3: Program List by Sector
- Attachment 4: Definitions
- Attachment 5: Customer Listening Sessions for 2024-2026 Plan



## 1.4 Timeline

As provided for under the LCP Standards, the Company ~~is opting~~has opted to combine the filing of the 2024-2026 ~~Three-Year~~ Plan with the first year (2024) of the Annual Plans. The Company submitted the combined filing to the EERMC seeking their endorsement by formal vote on September ~~XX~~30, 2023.

As specified in the Standards, the Company will file Annual Plans for 2025 and 2026 with the PUC on October 1, 2024, and October 1, 2025, respectively. It will seek support from the EERMC for each of those plans prior to filing. ~~Rhode Island~~RI Energy will continue to work with the EERMC and the EE TWG to meet these timelines.

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# ~~2.~~Section Two: Least-Cost Procurement Law and Standards

This section describes the Company's assessment of the 2024-2026 Plan's compliance with Least Cost Procurement Law and the LCP Standards as revised in Docket 23-07-EE.[4] In general, the Company's interpretation of the LCP Standards is as it was presented in the 2023 Annual Plan in Docket 22-33-EE, Section 7, modified for the recent revisions. The Company's interpretations are presented in Section 5 of the 2024 Annual Plan, filed simultaneously with this Plan.

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~~In general, the Company's interpretation of the Standards is as it was presented in the 2023 Energy Efficiency Plan in Docket 22-33-EE, Section 7, modified for the recent revisions.~~ The ~~interpretations are presented~~ Company demonstrates its consistency with the LCP Standards in Section 5 of the 2024 ~~Energy Efficiency~~Annual Plan~~ which is being~~. Subsequent annual plans filed ~~simultaneously with this Three-year Plan.~~

~~Demonstration of consistency with the Standards is also included in Section 5 of the 2024 Energy Efficiency Plan. Compliance~~ during the ~~first year of the Three-year Plan is indicative of~~2024-2026 term, the 2025 and 2026 Annual Plans, will have the requisite level of detail to assure compliance ~~over the full term of the Three-year Plan.~~

with LCP Standards. In the following subsections, ~~we discuss~~the Company discusses any key changes in the LCP Standards, and how said changes ~~impact~~impacted the Company's approach ~~to~~in its development of the Plan. ~~We~~The Company also ~~discuss~~discusses if, for any Standard, the consistency with the Standard is expected to change over the ~~Three-year~~2024-2026 term.

Commented [RIE3]: Steven Chybowski: I'm not sure I'm following this sentence. It seems like first year compliance could be indicative of the Company's "commitment" to compliance over the full term, but we can't say that it IS compliant for the future years yet.

Commented [RIE3R2]: Details to determine full compliance are in the annual plan as opposed to the 3YP. Subsequent annual plans will have the requisite level of detail to assure compliance.

## 2.1 Cost-Effectiveness

The Rhode Island Test (RI Test) compares the present value of the total lifetime benefits derived from efficiency savings to the total costs of acquiring those savings (i.e., program and customers' costs). According to the LCP Standards~~,~~:

> "any program with a quantified benefit-cost ratio greater than 1.0 (i.e., where quantified benefits are greater than quantified costs), should be considered cost-effective. Consistent with the PUC's

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[4] ~~NOTE TO EXTERNAL REVIEWERS: Written in anticipation of approval of new LCP standards as proposed by the PUC in April 2023.~~

guidance issued in Docket No. 4600, qualitative benefits and costs may be considered in determining cost- effectiveness. -The portfolio must be cost-effective and programs must be cost- effective.”[5]

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

- ~~An~~an additional view of cost- effectiveness that, “for categories with value or cost that is shared between Rhode Island Energy and other jurisdictions (both within the state and region), presents only those benefits and costs that will be allocated to Rhode Island Energy.” ~~In considering the nature of “other jurisdictions,” the Company interpreted~~For this ~~to refer to states other than Rhode Island, and that “Rhode Island Energy” therefore refers, in this case, to Rhode Island. Using this interpretation~~analysis, the Company identified certain categories of benefits that flow outside of Rhode Island.- These include a portion of demand reduction induced price effects (DRIPE) and pool transmission facility (PTF) capacity values. Attachment ~~2b~~[6]2 presents the requested additional view that shows that programs are still cost effective absent these benefits. To the best of the knowledge of the Company, no costs accrue outside of Rhode Island.

- ~~The~~Additionally, the changes to the LCP Standards in Docket 23-07-EE require that the “RI Test shall include the costs of ~~CO2~~carbon dioxide mitigation as they are imposed and are projected to be imposed by the Regional Greenhouse Gas Initiative, Rhode Island Renewable Energy Standard and Rhode Island *Act on Climate*.” In consultation with the OER, EERMC, and Division, the Companies developed a value and approach for ~~CO2~~carbon dioxide mitigation ~~was developed~~ which is used in all cost-effectiveness analyses in this Plan. -This approach uses Marginal Abatement Cost (MAC) from the 2021 Avoided Energy Supply Costs (AESC) study in the analysis, while the parties await resolution of the PUC’s Future of Gas docket.

The ~~Company’s Three-year~~ Plan is consistent with these cost-effectiveness requirements and interpretations as demonstrated in Attachment 2 and ~~will be subsequently~~ demonstrated in the 2024 Annual Plan ~~for 2024.~~ . The Company does not expect significant variance in compliance between 2024 and subsequent years of the ~~Three-year~~2024-2026 term. The Company has analyzed the cost effectiveness for the proposed 2024 portfolio and programs using the RI Test as required by Docket 4600 and the LCP Standards. The portfolio and programs proposed for 2024 satisfy these criteria for cost effectiveness. The RI Test includes benefits in the form of primary fuel energy savings (electricity and natural gas), the value of other resources (fuel and water) benefits, price effects, non-embedded

[5] RI PUC Docket 5015, LCP Standards, Section 3.2N.

~~[6] To be provided in subsequent versions of this Plan, subject to decision among parties about what benefits flow out of Rhode Island.~~

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**Formatted:** Space Before: 6 pt, Line spacing: Multiple 1.15 li greenhouse gas reduction benefits, non-embedded nitrous oxide reduction benefits, the value of improved reliability, and non-energy impacts (NEIs). Costs include all projects costs, program planning and administration, sales, technical assistance and training, evaluation, and the performance incentive. Notably, cost-effectiveness results do not include economic impacts such as employment and gross state product impacts from energy efficiency investments.

While not required, the Company also reviewed benefit-cost ratios at the measure-level to ensure ratepayers and participants will receive net positive benefits from energy efficiency investments.

## 2.2 Reliability

The Standards for reliability create an expectation that the Company will be able to deliver the programs described herein and that the savings realized from program delivery are accurately estimated and measured. ~~-~~In addition, as applicable, programs should be scalable and ~~be~~ tailored to meet specific system needs. No changes were made to the LCP Standards for reliability in the revisions in Docket 23-07-EE. The Plan is consistent with this interpretation as is demonstrated in the 2024 Annual Plan. The Company does not expect significant variance in compliance between 2024 and subsequent years of the 2024-2026 term.

~~No changes were made to the Standards for reliability in the revisions in Docket 23-07-EE.~~

~~The Company's Three-year Plan is consistent with this interpretation as will be subsequently demonstrated in the Annual Plan for 2024. The Company does not expect significant variance in compliance between 2024 and subsequent years of the Three-year term.~~

The Company ensures reliability through the delivery of reliable energy savings. These savings are verified through third-party consulting firms that conduct robust annual EM&V studies to ensure claimed savings are as accurate as possible and to account for spillover, free ridership, and other industry standard factors. This EM&V process also supports the Company's participation in the ISO-New England's Forward Capacity Market (FCM). Passive demand savings achieved via electric energy efficiency and Combined Heat and Power projects, and verified by the EM&V process, continue to participate in the FCM as Passive On-Peak Demand Resources. Together, these approaches comply with the Standard of Reliability.

## 2.3 Prudency

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



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- Support for the purposes of ~~Least Cost Procurement~~LCP.
- Synergy savings through alternatives that meet multiple needs.
- Management of risks to ratepayers and the distribution Company.
- Effective use of funding sources.
- Equitable in the allocation of costs, benefits, ~~and~~access to services, and participation.
- Rate and bill impacts.
- Continuity of implementation efforts.

No changes were made to the Standards for prudency in the revisions in Docket 23-07-EE.

The Company's ~~Three-year~~ Plan is consistent with this interpretation as ~~will be subsequently~~is demonstrated in the 2024 Annual ~~Pan for 2024.~~ Plan. The Company does not expect significant variance in compliance between 2024 and subsequent years of the ~~Three-year~~2024-2026 term. Details regarding how the Company has considered each of the above components is available in the 2024 Annual Plan.

## 2.4 Environmentally Responsible

Environmental responsibility includes compliance of the energy efficiency plan with state policies, particularly ~~pollution~~ climate change and the reduction~~. It~~ of harmful air pollutants including carbon dioxide, nitrous oxides, sulfur oxides, and chlorofluorocarbons (from refrigerants). Environmental stewardship further requires proper valuation of environmental costs and benefits in the ~~plan.~~

Plan. Modifications to the Standards in Docket 23-07-EE specify ~~that~~ demonstration of environmental responsibility ~~include~~includes an assessment of compliance with state climate policies, and proper valuation of climate costs and benefits, in addition to environmental costs and benefits. The Company's interpretation of this addition is that~~,~~ by distinguishing between environmental policies and values and climate policy and values, the ~~Commission~~PUC intends for the Company to assess the climate impacts of its energy efficiency programs, specifically as they relate to the *Act on* ~~Climate~~*Climate*'s targets.

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The proposed revised LCP Standards require "the distribution company shall assess how investment complies with State environmental and climate policies and shall properly value environmental and climate costs and benefits~~".~~." For the purposes of compliance with this section of the Standards, the Company ~~will assess~~has assessed how its 2024-2026 ~~Energy Efficiency Three-Year~~ Plan complies~~—~~, or otherwise advances~~—~~, the ~~2021~~ *Act on Climate*~~, which sets~~. This legislation codified statewide, economy-wide greenhouse gas emissions reduction mandates.[7] The ~~2021 Act on Climate only contemplates the role of the State, not Rhode Island Energy; therefore, there is no standard against which to assess the extent to which the~~ proposed ~~investments comply with the 2021 Act on Climate. However, the proposed~~Plan investments reduce both electric and gas consumption~~.~~, and both portfolios will make a meaningful contribution to reduction in emissions by driving reductions in customer energy usage in both the short and long term.

On the electric side, prior to meeting the 100~~%~~ percent Renewable Energy Standard in 2033, any electric savings will directly support the State in meeting its 2030 greenhouse gas emissions reduction mandate~~.~~ under the *Act on Climate*. On the gas side, all gas savings will directly support the State in meeting its 2030 greenhouse gas emissions reduction mandate. Indeed, the State's *2022 Climate Update* to the *2016 Greenhouse Gas Emissions Reduction Plan* calls out both electric and gas energy efficiency as a priority short-term action to get Rhode Island on the path to meet the ~~2021~~ *Act on Climate*'s 2030 mandate. To properly value the environmental and climate costs and benefits associated with the proposed investment in energy efficiency, the Company ~~will use both~~uses the marginal abatement ~~cost and social~~ cost of carbon, as appropriate, to monetize both embedded and non-embedded value of greenhouse gas emissions ~~reduction~~reductions.

The ~~Company's Three-year~~ Plan is consistent with this interpretation as demonstrated in Attachment 2 and ~~as will be subsequently~~is demonstrated in the ~~Annual Plan for~~ 2024~~.~~ Annual Plan. The Company's 2024-2026 Plan and 2024 Annual Plan demonstrate prioritization of meeting the *Act on Climate* mandates through the reduction of gas and electric consumption, investment in the green workforce, and the prioritization of other decarbonization strategies, such as heat pump deployment and other forms of electrification. The Company does not expect significant variance in compliance between 2024 and subsequent years of the ~~Three-year~~2024-2026 term.

[7] See 2021 Act on Climate (Apr. 4, 2021).



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## 2.5 Cost of Annual Plan Compared to the Cost of Energy Supply

~~In accordance with the LCP Standards, the Company assesses the cost of incremental energy supply and the cost of energy efficiency using all applicable costs enumerated in the Rhode Island Benefit Cost Framework (Framework) approved by the PUC in Docket 4600-A and the Rhode Island Test as described in Attachment 4 RI Benefit Cost Test. This method is substantially the same as that used in the 2023 Plan.~~Please see Section 5.5.1 of the 2024 Annual Plan for the Company's interpretation of the Standard of being lower than the cost of additional supply. RI Energy's Plan is consistent with this interpretation as demonstrated in Section 5.5.2 and the Company does not expect consistency to vary between 2024 and subsequent years of the 2024-2026 term.

Like the Standard for cost-effectiveness, in Docket 23-07-EE, changes to the Standards required an additional analysis of the cost of supply comparison that, "for categories with value or cost that is shared between Rhode Island Energy and other jurisdictions (both within the state and region), presents only those benefits and costs that will be allocated to Rhode Island Energy." ~~In considering the nature of "other jurisdictions," the Company interpreted~~For this ~~to refer to states other than Rhode Island, and that "Rhode Island Energy" therefore refers, in this case, to Rhode Island. Using this interpretation~~analysis, the Company identified certain categories of benefits that flow outside of Rhode Island. These include a portion of ~~demand reduction induced price effects (~~DRIPE~~)~~ and ~~pool transmission facility (~~PTF~~)~~ capacity values. To the best of the knowledge of the Company, no costs accrue outside of Rhode Island.

The Company's ~~Three-year~~ Plan is consistent with this interpretation as will be subsequently demonstrated in the 2024 Annual Plan. The Company does not expect significant variance in compliance between 2024 and subsequent years of the ~~Three-year~~2024-2026 term.

# ~~3.~~ Section Three: Themes and Priorities ~~and Programs~~

## 3.1 Strategic Overview of Programs and Priorities

**Two overarching themes run throughout the design of the Company's energy efficiency programs for this ~~next Three-Year~~2024-2026 Plan:**

~~1. Customers' needs to be at the center of all our efforts.~~

1. **Company's efforts should be customer-centric and focus on customers' and markets' needs.**
2. **Programs need to serve customers equitably.**

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In developing this~~ Three-Year~~ Plan, the Company explored where the pockets of potential efficiency savings reside and how to access them. ~~Utilizing the~~Through market research~~ at the Company's disposal,~~, such as the Residential Nonparticipant Market Barriers study, ~~as an example, ~~the Company will work to close the awareness gap around programs and dedicate appropriate resources to ~~get more customers in the door~~first make non-participating customer classes aware of efficiency programs and then engage them effectively to move them to participation. Once engaged, customers need to be presented with measures and program approaches that create value for them.

Over the next three years, the Company will ~~cast a wide net for~~actively seek out new products and program approaches that ~~are relevant to~~could benefit Rhode Island~~. On the~~ energy consumers. For Residential ~~side~~Programs, this will include an emphasis on electric resistance space and water heating conversions as well as pushing zero net energy projects in the residential new construction market. ~~On the Commercial & Industrial (C&I) side, program~~For C&I Programs, the Company's offerings will continue to diversify, not only with new measures, but with approaches to strategic energy management through retro-commissioning, remote monitoring, and building energy data analysis.[8]

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The Company recognizes ~~that providing ~~the need to provide streamlined, effective financing solutions to customers ~~includes facilitating~~to facilitate project financing and ~~leveraging~~to leverage other programs that fund efficiency work. On-bill repayment has been a successful tool; however, it is only one of many financing mechanisms to support project implementation. The Company has, and will continue to, work closely with the OER to coordinate their ~~High-Efficiency~~Clean Heat ~~Pump~~Rhode Island Program (Clean Heat RI Program) and the influx of new federal funding ~~they will administer via~~through IRA. During the ~~Inflation Reduction Act (IRA). ~~listening sessions, several participants referenced the need for the Company to integrate the delivery of federal and state energy efficiency programs, such as the Clean Heat RI Program, and to make sure more customers are made aware of the programs and incentives.[9]

Key to program success will be an adequate supply of skilled people to identify and implement projects. The Company will coordinate with the state on these efforts, as we recognize that workforce development requires a holistic, collaborative approach. In terms of the ~~Three-Year ~~Plan, the ~~company~~Company will target increased capacity to support zero net energy projects, building operator certification, codes and standards compliance training, and developing the weatherization workforce.

[8] See Attachment 5: 2023 Customer Listening Sessions. The diversification of measures aligns with feedback from the Company's Listening Sessions where participants suggested more measures and program support for existing buildings.

[9] See Attachment 5: 2023 Customer Listening Sessions.

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~~As mentioned, all~~For the 2024-2026 term, the Company's programs will be considered through a lens of equity. In this ~~Three-Year~~ Plan, the Company strives to create a portfolio of programs ~~that are~~ designed to provide benefits equitably across all demographics. ~~Income Eligible Services~~The IES Program will accelerate electric resistance to heat pump conversions for qualifying customers and continue to tackle pre-weatherization barriers. During the 2024-2026 term, the commercial Main Streets Initiative will continue to prioritize ~~Environmental~~ Justice 40 focus areas.[10] The Company will also continue ~~actively participating in~~to co-lead the EE EWG ~~and other state and local~~. Over the next three years, the Company will work to align equity ~~initiatives.~~metrics so they encompass federal Justice 40 regions within Rhode Island and to ensure they are consistent with OER equity metrics reporting.

The Company will continue to engage equity focused organizations and educate them about energy efficiency so they can assist with expanding recognition and awareness of the Income Eligible Services (IES) Program and other efficiency programs. This focus aligns once again with feedback from the Listening Sessions where several customers suggested the Company resource community-based organizations to conduct outreach and partner with trusted community leaders who have the same ethnic background and are part of the local community.[11]

Exhibit 1 below presents a visual representation of how the Company has structured priorities for the 2024-2026 ~~Energy Efficiency Three-Year~~ Plan. ~~All programs center on the customer and are viewed through a lens of equity.~~

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~~Exhibit~~***Figure 1: Visualization of Three-Year Plan Strategy***

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

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[11] See Attachment 5: 2023 Customer Listening Sessions.

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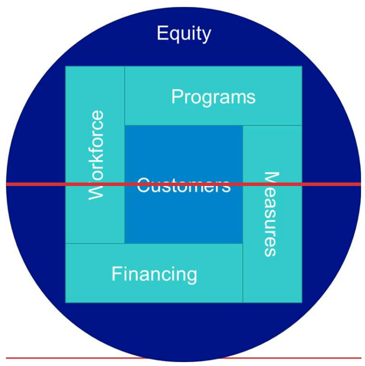


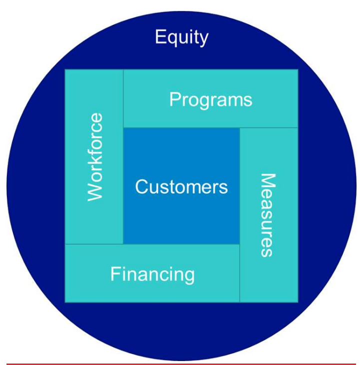


## 3.2 Priorities for ~~Three Year~~the 2024-2026 Plan

*(The sections below indicate the priorities as identified by Rhode Island Energy strategy teams at this stage of planning. These priorities may be adjusted during the planning process.)*

To achieve its objectives, the Company must confront and overcome several challenges to its energy efficiency programs, both known and emerging. Economic uncertainty, inflation, and higher interest rates impact utility customers' financial calculus, and perhaps their willingness, to implement energy conservation initiatives. The decline in claimable savings associated with high efficiency lighting demonstrates how programs can transform a market and drive the Company in search of new customers and novel opportunities for cost-effective energy savings. ~~The welcome influx of federal support for efficiency may increase the demands that must be met by the current workforce and supply chain. The Company also acknowledges that the future of gas efficiency programs is a subject of serious~~

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~~consideration for this upcoming planning cycle considering the state's decarbonization targets. Though unlikely to heavily impact the 2024 annual plan, the Public Utility Commission (Docket 22-01-NG Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island in Light of the Act on Climate) and its subsequent rulings could impact the latter years of this Plan. Following this docket, the Company expects to have better visibility into the PUC's preferred decarbonization pathways and how those will impact natural gas incentives. The Company is open to discussions with stakeholders during this planning process to discuss how gas incentives could start to be adjusted during this three-year period.~~ The welcome influx of federal support for efficiency may increase demand and meeting this demand will require significant expansion of the current workforce and supply chain.

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The Company recognizes that in each challenge exists inherent opportunity and seeks to innovate to enhance and expand energy efficiency support provided to its customers. To do this, the Company plans to focus on the following five ~~strategies~~priorities aimed at increasing customer participation and enhancing the Company's ability to deliver valuable long-term energy savings~~:~~.

1. ~~Reach more customers: Deliver optimized, tailored programs.~~
2. ~~Help customers find the right measures: Implement a comprehensive approach to the next generation of efficiency measures.~~
3. ~~Enable customers to invest in efficiency: Enhance financing options and customer awareness of complementary funding sources.~~
4. ~~Serve customers equitably: Design programs with a conscious effort to serve low- and moderate-income; gender, racially and ethnically diverse; and non-native English-speaking customers.~~
5. ~~Ensure workforce capacity to serve customers.~~

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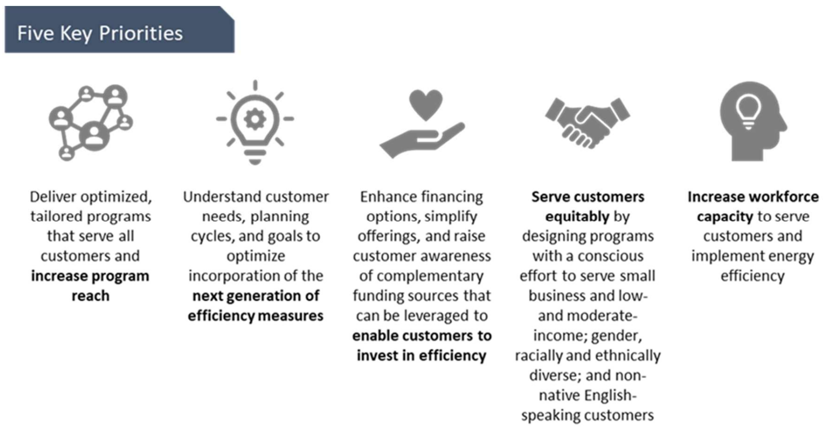


### 3.2.1 ~~Reach More Customers~~ Priority 1: Deliver Optimized, Tailored Programs

#### Strategic Philosophy

Program constraints, supply chain issues, contractor availability, and other market forces often throw a kink in the progression from customer acquisition to project completion. While these forces impact all customers and programs, the extent of the force exerted by each factor can vary widely between customer segments. A "one-size-fits-all" approach results in "one-size-fits-some" programs. ~~On the other hand, it~~An individual customer approach is cost-prohibitive ~~to tailor programs to each individual customer. Therefore~~; therefore, the Company's strategy will be to identify customer segments ~~that represent~~representing significant, ~~yet relatively untapped savings potential and design~~opportunities for expanded program support ~~targeted to~~and will inform the Company's tactics for targeting these ~~segments.~~ customers.

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#### Cross-Cutting Tactics

The Company will continue to invest resources in collecting more detailed market information to improve outreach to customers. ~~This market research will identify customer segments that represent significant opportunities for expanded program support and participation and will inform the Company's tactics for targeting these customers. To serve these~~To better serve customers, the Company will add more training for internal and external sales and technical staff to secure a better understanding of customer requirements, allowing staff and vendors to effectively provide solutions that drive value in the areas important to specific customer groups. By expanding the vendor pool and streamlining

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technical review, the Company can continue to improve on delivering timely service to customers while contributing to improved customer satisfaction.

The Company ~~knows that~~understands barriers such as lack of understanding/education, difficulty of participating in complicated programs, and lack of access to capital must be addressed at some level~~, and~~. Therefore, the Company will seek to design programs which address specific market failures and barriers faced by different customer segments. For example, the Residential Non-Participant Study indicated lower awareness of the energy efficiency programs among non-participants. During the 2024-2026 term, a comprehensive marketing campaign will be deployed in English and Spanish to educate customers on the availability of energy efficiency programs. The Company has also engaged with CommerceRI to discuss the coordination of the two entities' commercial and residential incentives and loan programs. While these discussions are in the early stages, the Company will continue coordinating with CommerceRI to provide another avenue to increase the awareness of efficiency program offerings.

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The Company's Listening Sessions also revealed how non-participants had lower awareness of energy efficiency programs. Session participants made several recommendations to overcome barriers and increase program participation including outreach to K-12 students, bilingual outreach and education programs, proactive outreach to utility customers in arrears, and hosting educational forums/events in public places such as parks, libraries, and grocery stores.[12] As appropriate, RI Energy will look to integrate these suggested strategies during the 2024-2026 term.

## Residential & Income Eligible Tactics

~~Rhode Island Energy~~For the 2024-2026 term, the Company will ~~be focusing~~focus its efforts ~~that began in 2023 with~~on expanded outreach to five ~~target~~ communities targeted during the 2023 program year with the goal of increasing customer participation in the towns of Central Falls, East Providence, Pawtucket, Providence, and Woonsocket. As the tools are developed to better tailor marketing to targeted subsets within these communities, the Company will look to align with Justice40 Initiative communities so customers living within these communities receive incremental benefits from ~~Federal, State~~federal, state, and private initiatives that coordinate and coalesce to make a significant impact.[13]

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[12] See Attachment 5: 2023 Customer Listening Sessions.

[13] See Attachment 5: 2023 Customer Listening Sessions. This aligns with Listening Session participants who suggested the Company coordinate more with state and federal programs.

The Company will ~~looks~~ looks to partner with ~~Community Based Organizations in reaching~~community-based organizations to engage customers ~~that~~who historically have not participated in the ~~residential programs~~Residential and IES Programs.

### Commercial & Industrial Tactics

The Company recognizes that new ways of reaching C&I customers, from those facing economic pressures to those with aggressive carbon reduction strategies, may be necessary. To that end, the Company has expanded its eligibility requirements for the Small Business program from customers who consume less than 1.0 million kWh annually, to customers who consume less than 1.5 million kWh annually~~.~~. This change was made to increase program participation. Over the 2024-2026 term, RI Energy will monitor participation and vendor outreach initiatives to ensure all small business customers have the opportunity to use program resources.

The Company will ~~also~~ look to deploy a data-driven approach to increasing customer participation in the ~~commercial and industrial~~C&I sectors. This approach will include analyzing customer consumption data (i.e., kilowatt-hours, peak load, and therms) and past energy efficiency participation to better target customers who have historically not participated at the same rate and pace as their C&I peers. This analysis is likely to provide valuable insights into energy efficiency opportunities, while potentially providing insight into barriers and rationales for non-participances. ~~Lastly, the Company~~

RI Energy will also look to expand the reach of its Strategic Energy Management Planning (SEMP) Initiative to support the increasing number of customers ~~with climate and sustainability goals~~who have climate and sustainability goals. As part of the SEMP Initiative's eligibility criteria, the Company often looks for customers with sustainability or corporate environmental goals. Through the SEMP Initiative, RI Energy can help outline strategies to help customers achieve sustainability and environmental goals and memorialize them in a non-binding memorandum of understanding (MOU). Often, a customer's sustainability or environmental goals serve as a jumping off point to initiate an MOU and SEMP agreement.

~~**3.2.2 Help customers find the right measures: Implement a comprehensive approach to the next generation of efficiency measures.**~~

## 3.2.2 Priority 2: Understand Customer Needs

### Strategic Philosophy

Energy efficiency has evolved far beyond the low-hanging fruit of high efficiency lighting. To continue to reap the benefits of energy efficiency, customers must increasingly turn towards more complex~~, more~~ and customized~~, higher~~

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**Commented [RIE4]: Adrian Caesar:** So it can offer more generous support and incentives to more C&I customers? Would like to see some commentary on why this change was made and the anticipated benefits/impacts. An unforeseen consequence: vendors target only the SBS customers with the highest consumption, thereby diverting resources and support from the smallest customers

**Commented [RIE4R2]:** This change was made to increase participation. RIE will track what customers vendors are targeting to ensure that they are not only focusing on larger SBS customers.

**Commented [RIE5]: Steven Chybowski:** I'm just curious approx. how many additional businesses will qualify for the small biz program with this update

**Commented [RIE5R2]:** We are looking into the number of accounts affected, however the decision to increase the threshold from 1.0 to 1.5 mil kWh was made after a saturation analysis was completed and identified that particular participation range as the lowest among all C&I customers.

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**Commented [RIE6]: Steven Chybowski:** I heard that the SEMP program may look at expanding to include large multifamily complexes – could that be one avenue to help overcome the landlord/tenant split incentive?

**Commented [RIE6R2]:** SEMP work well with our largest customers because they have the internal staffing expertise, corporate or institutional sustainability goals, and a level of in-house sophistication to make organization changes. Theses are critical factors when outlining a 3-year SEMP MOU. Unfortunately, SEMP is probably the wrong pathway to reducing this barrier and achieving those savings. However, there could be opportunity in the Main Streets initiative, which targets small business (that are often connected to MF units) by location to provide energy assessments.

**Commented [RIE7]: Steven Chybowski:** Curious what this means as well. Does this mean you will be looking to target companies identified as having sustainability goals for SEMP enrollment?

**Commented [RIE7R2]:** That's correct. As part of our SEMP eligibility criteria, the Company often looks for customers with sustainability or corporate environmental goals (in addition to other attributes that make for a successful partnership).

... [3]

~~commitment~~ measures such as heating, ventilation, and air conditioning (HVAC~~ systems~~) equipment and control systems. ~~The higher complexity of these~~Complexity may arise when weighing options, for example, between different HVAC makes, models and configurations. While this is not the case for all measures, it necessitates additional effort from the Company to ensure~~ that~~ programs are helping customers identify the measures that make sense for their specific situation, in addition to ensuring their successful installation and operation~~.~~. The Company is ramping up the recently launched Building Analytics Program, with customers signing up in 2023 and savings expected in 2024. The Energy Management Systems offering has undergone a program revamp that is expected to result in higher non-lighting savings and more participation.

Additionally, with Rhode Island's Act on Climate, the Company must evaluate measures and program design through the additional lens of its contribution to the broader economy-wide efforts towards decarbonization. ~~Therefore, the Company's strategy will be to invest in research to identify the next generation of impactful efficiency measures, and to redesign programs to effectively support these measures.~~

## Cross-Cutting Tactics

During the 2024-2026 term, the Company will explore innovative strategies and technologies ~~that are unique~~applicable to the Rhode Island customer-base and market situation. To supplement these findings, the Company will ~~look to~~ learn from ~~demonstrations, pilots, and assessments conducted both regionally and nationally~~other efficiency programs, and to discern if those strategies could be successfully deployed in the Rhode Island market. The Company maintains active memberships in the Northeast Energy Efficiency Partnership (NEEP), the Consortium for Energy Efficiency (CEE), the Association of Energy Service Professionals, ESource, and other groups, both formal and informal, that facilitate knowledge transfer among program administrators. This targeted approach, coupled with learnings from other jurisdictions, ~~should permit Rhode Island to be an early adopter of~~and our ability to adjust incentives during the program year allows the Company to adopt successful energy efficiency strategies and ~~technologies without having to fund the costs associated with launching and evaluating demonstrations, pilots,~~technologies and ~~assessments that are being conducted in other jurisdictions.~~evolve programs to meet customer needs.

In this ~~Three-Year~~ Plan, the Company ~~will explore~~took a conscious look at the ~~possibility~~role of ~~right-sizing~~gas incentives, based on market analysis and input from stakeholders. The following criteria were used to assess how gas incentives should be sized:

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**Commented [RIE8]: Adrian Caesar:** An important point!

**Commented [RIE8R2]:** Thanks for the comment Adrian.

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**Commented [RIE9]: Adrian Caesar:** What about innovative strategies and technologies that are broadly applicable and not just unique to Rhode Island?

**Commented [RIE9R2]:** Correct, RIE will look for innovative solutions at both a state specific level and at a universally acceptable level.

**Commented [RIE10]: Steven Chybowski:** I like that. I think our small size and annual plan process (rather than a 3-year binding plan), provides the flexibility to adopt and implement new solutions relatively quickly and we should capitalize on that

**Commented [RIE10R2]:** Thank you for the note Steve

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### *Cost Effectiveness*

While cost effectiveness for ~~fossil fuel~~the Plan is measured at the program level, measure-level benefit-cost ratios are calculated as well. In this Plan, all programs are cost effective; however, the Company looked at the measure level to analyze which gas efficiency measures were not cost effective. These gas efficiency measures, primarily in the residential sector, were reduced or removed entirely from the Plan where prudent. The funds from these gas efficiency measures were shifted to more cost-effective gas measures within the residential sector or to the C&I sector.

### *Shift from Gas Equipment*

Within the cost-effectiveness framework, the Company undertook an effort to shift funds from gas-consuming equipment ~~and options for optimizing~~to measures that help use gas more efficiently such as weatherization.

### *Market Forces*

External market forces of supply and demand played a major role in determining incentive levels. On the supply side, the Company wanted to be sure that viable electric ~~versus gas to~~ alternatives exist for customers for any gas efficiency measures that got reduced budgets or were discontinued. The Company did not reduce or discontinue any gas efficiency measures for which there was no viable electric alternative.

On the demand side, some members of the EERMC expressed opinions for both residential and C&I customers that customer choice is important and gas efficiency incentives should continue to encourage gas customers to get the most efficient equipment possible. Indeed, the Company retained many gas efficiency measures.

For multifamily gas furnaces specifically, the Company decided to keep the multifamily heating measures within the IES Multifamily and C&I Multifamily Programs so there would be comprehensive offerings to building owners. The heating system is of utmost concern to building owners and if the opportunity for incentives does not exist, they may not even be willing to meet with the team. Once in the door, the sales team can work on education which also includes electrification. There are also limited alternatives in the short term. Since these are both custom measures, the Company can work to ensure that there is an up-to-date custom screening tool being used and only cost-effective projects progress. Both the IES Multifamily and C&I Multifamily Programs have strong benefit-cost ratios. With the added focus on the screening tool, the team feels that these heating measures will be cost effective in practice. Anticipating success in electric heating conversions, the Company plans for furnaces to trend downwards over the 2024-2026 term.

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Regarding new construction, RI Energy realizes there are some progressive home builders promoting all-electric new construction, and the Company supports them. However, based on the Company's interaction with the broader market, the majority of builders still plan for gas in new construction design. While RI Energy does not explicitly encourage new gas connections and will continue to educate the market on electric alternatives, the Company still feels it is valuable to offer customer choice and promote the ~~state's~~most efficient gas equipment possible, rather than have that lost opportunity. Furthermore, the Company stays abreast of new energy code adoption and will continue to adjust incentives as codes dictate.

The Future of Gas docket (as discussed in section 3.4.4 of this Plan) also needs to be considered in this analysis. Answers to the larger policy questions being addressed in the Future of Gas docket, and which are beyond the scope of the Company's net benefits analysis, should be aligned with the findings and recommendations made by the PUC at the conclusion of the proceeding. The range of decarbonization ~~agenda and meet stakeholders' desires for aligning the energy efficiency programs with the Act on Climate. The PUC has initiated a docket (Docket 22-01-NG) to explore the future of natural gas for the state. RI Energy plans to track the orders and other relevant findings from this docket to inform~~ scenarios being contemplated in the Future of Gas docket include analysis of various levels of energy efficiency ~~design for this Three-Year Plan.~~ investments, which will be valuable to inform this process. As such, RI Energy's strategy to continue, yet refine, gas efficiency incentives during the 2024-2026 term is both consistent with ongoing policy conversations about thermal decarbonization and flexible to accommodate policy changes as they arise.

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~~RI Energy has also proposed a business case for the expansion of Advanced Metering Functionality (AMF) across its electric service territory. As described in the Company's proposal, the expansion of AMF creates several opportunities for behavior programs, such as the Home Energy Reports program.~~

## Residential & Income Eligible Tactics

For the Residential and ~~Income Eligible~~IES Programs, in addition to a continued emphasis on the core weatherization programs, the Company will prioritize electric resistance heat to air source heat pump conversions. The Company's goals for this conversion effort necessitate a comprehensive approach that includes weatherization agencies, HVAC installers, and the various stakeholders who own and rent housing throughout Rhode Island. The Company will coordinate and collaborate with the OER on its ~~High-Efficiency~~Clean Heat ~~Pump~~RI Program to support supplemental measures, such as the aforementioned weatherization services.

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Another area for potential program redesign is ~~residential new construction. The most~~the Residential New Construction Program. A recent evaluation indicates ~~that~~ energy savings between recent new construction participants and non-participants has narrowed. This finding provides the Company with an opportunity to focus on higher savings building approaches. To do so, the Company plans to revisit which measures and/or market segments should be included in the Residential New Construction Program. ~~In addition, the Company intends to explore options for promoting zero-energy ready homes.~~ In addition, the Company will explore options for promoting zero-energy ready homes and Passive House for the multifamily sector. New residential construction has been very slow in Rhode Island compared to other states based on a recent study of residential building permit data.[14] Based on the data, Rhode Island was last in the country in new building permits in 2021. However, the Rhode Island General Assembly passed several new bills in the most recent legislative session aimed to spur housing development. RI Energy will continue to monitor and evaluate how these bills will impact the demand for energy efficiency programs and how energy efficiency can be incorporated in their implementation.

## Commercial & Industrial Tactics

As high efficiency lighting opportunities decline, the Company will expand its existing C&I programs to deliver an increasingly diverse portfolio of savings. High-performance HVAC offerings will be augmented by services supporting more advanced system controls, energy management systems and building analytics. These energy efficiency technologies will be offered through multiple pathways, including but not limited to retro-commissioning, monitoring-based commissioning, equipment right-sizing and the ~~upstream program.~~Upstream Program.

Additionally, the Company will look to provide enhanced incentives to customers who commit to implementing comprehensive energy efficiency measures within a specified timeframe. To qualify for the enhanced incentives, the customer will need to commit to installing three or more energy efficiency measures with different end-uses within a program year. The objective is to accelerate deeper, more comprehensive measure adoption by reducing the payback period for customers.

Further, the Company will develop a host of prescriptive and custom offerings to promote commercial weatherization and greenhouse gas emission reductions. These offerings include prescriptive weatherization and air sealing, ~~energy recovery ventilators,~~ gas and refrigeration leak reduction, ~~and~~ upstream heat pumps, and energy recovery ventilators and dedicated outdoor air systems with energy recovery ventilators. The Company will also work with OER to better understand electrification efforts being funded through state and federal programs, and to determine if synergistic

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**Commented [RIE11]: Steven Chybowski:** Will RNC be all-electric moving forward? I believe there was some past discussion on this topic, and I think it makes sense that this would be a program that can phase out gas incentives now

**Commented [RIE11R2]:** See explanation above in Cross Cutting section of 3.2.2

**Commented [RIE12]: Susan AnderBois:** This was all written before the end of the legislative session – but just a flag that a whole slew of housing bills passed the general assembly this year. There should be an evaluation of what passed and how EE can be incorporated into the new building that is sure to happen in RI in the coming years.

**Commented [RIE12R2]:** Addressed in the text.

**Commented [RIE13]: Adrian Caesar:** We need to transition to all-electric only over this plan period. Please commit to doing so here. And should there be any explicit mention of renewables integration with ZERH building efforts?

Also consider explicit mention of Passive House which is likely to be the principal route to MF (net) zero-energy new buildings.

**Commented [RIE13R2]:** See explanation above in Cross Cutting section of 3.2.2

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**Commented [RIE14]: Adrian Caesar:** Could this be rephrased as high efficiency dedicated outside air systems? Or are you talking about something else?

**Commented [RIE14R2]:** Refined the text.

[14] See Boutique Home Plans, The State of Residential New Construction in America.

measures could be deployed through the Company's ~~energy efficiency programs~~Energy Efficiency Programs to advance electrification efforts. The Company anticipates these synergies would likely occur on projects relating to weatherization, ventilation and controls. –

### 3.2.3 Priority 3: Enable ~~customers~~Customers to ~~invest~~Invest in ~~efficiency: Enhance financing options and customer awareness of complementary funding sources.~~Efficiency

## Strategic Philosophy

One of the fundamental pillars of energy efficiency investment is the idea that a greater upfront investment will yield greater lifetime savings, given the decrease in ongoing consumption and costs. However, the decision is often not as simple as comparing net present values or finding a favorable payback period. While one-time rebate incentives help mitigate the first cost of efficiency measures, access to capital can still inhibit customers' ability to invest in efficiency. Straightforward, readily available financing increases project implementation and extends program dollars to serve a greater number of customers. Therefore, the Company's strategy will be to explore ways to enhance and expand the suite of financing offerings available to customers to enable more customers to make affordable, impactful multi-year investments in efficiency.

## Cross-Cutting Tactics

The Company ~~has~~offers several financing vehicles ~~currently on offer~~ to customers (e.g., On-Bill ~~Refinancing~~Repayment, Third-Party C&I Financing, HEAT Loan, Efficient Buildings Fund), and will investigate ways in which these offerings can be expanded to serve more customers~~.~~. Ove the course of the Plan, the Company will evaluate revising the HEAT Loan to ensure optimal use of ratepayer funds. . To make financing more useful in moving projects across the finish line, the Company will provide additional training on available financing mechanisms and how to position them effectively to internal sales staff and trade allies. At the same time, RI Energy recognizes gaps in current ~~finance~~its financing offerings, such as a lack of options for landlords in the Multifamily ~~program~~Program, and the Company plans to work to find effective ways to address these gaps.

In addition to financing, the Company will collaborate with OER to integrate program incentives with state and federal funding. OER will administer $64 million in funding designated for a variety of home improvements from the federal IRA, in addition to the $25 million from the American Rescue Plan Act (ARPA) for its ~~High-Efficiency~~Clean Heat ~~Pump~~RI Program. The IRA also offers several enhanced tax credits to encourage homeowners to pursue efficiency and electrification measures. The Rhode Island Infrastructure Bank, in addition to their $5 million annual allocation of



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**Commented [RIE15]: Adrian Caesar:** To allow for weatherization & heat pumps, are the existing loan limits high enough? Commit to exploring increasing these loan limits for these types of projects.

**Commented [RIE15R2]:** Updated per your suggestion. Thank you.

**Commented [RIE16]: Adrian Caesar:** In 2020 the Council/C-Team/OER conducted some research on financing gaps and one key issue was tied to pre-weatherization/health & safety barriers. Raising this because gaps in financing may not only relate to upfront costs for actual measures

**Commented [RIE16R2]:** Thanks for bringing up this point Adrian, RIE will be sure to plan for not only financing gaps but also pre-weatherization and health/safety barriers.

**Commented [RIE17]: Adrian Caesar:** Would like to see some more committal language in instances like these. What will the work entail - research, focus groups, internal assessment of financing offerings, proposals for new financing options?

**Commented [RIE17R2]:** Further detail provided in annual plan.

**Commented [RIE18]: Adrian Caesar:** Are we sure all of this will be used for a heat pump program? Some of the HOMES funds will be for weatherization. And what about HPWHs?

**Commented [RIE18R2]:** We aren't indicating that the $64 million will be for heat pumps but only stating that this funding is in addition to the $25 million OER has received to date.

program dollars, received an additional $5 million from a 2022 state bond issue to support a small business energy efficiency fund. ~~The Company intends to leverage these outside dollars to encourage greater program participation.~~

## Residential & Income Eligible Tactics

The Company intends to explore both financing strategies and leveraged funding for customers. As part of this effort, the Company plans to re-examine the structure of its ~~Heat~~HEAT Loan. One concern with the current ~~Heat~~HEAT Loan model is that the ~~0~~zero percent interest buy down may restrict the overall number of customers that the loan can reach, given its limited funds combined with the recent increase in interest rates. ~~One potential alteration would be to offer tiered Heat Loan incentives based on income level or energy efficiency measures financed and reserving the 0 percent Heat Loan for income-eligible customers, as well as potentially increasing the Heat Loan cap. This potential redesign of the Heat Loan would require significant thought on how to provide income verification without overcomplicating the process.~~The Company is working to restructure the HEAT Loan to a flat 5% interest rate buy down. Additional information on this effort can be found in the Company's 2024 Annual Plan, Attachment 1.

## Commercial & Industrial Tactics

The Company will continue to promote its On Bill Repayment offering to all C&I natural gas accounts and to large C&I electric accounts that consume more than 1,~~000~~500 MWh per year. The On Bill Repayment offering provides rapid approval, zero interest loans for qualified energy efficiency projects. The loan size available for natural gas customers ranges from $1,000 to ~~≈$~~$100,000 (the loan size may be larger for SEMP or special projects), with a maximum tenor of three years for commercial accounts, and five years for ~~State~~state facilities. For electric customers who consume over 1,~~000~~500 MWh annually, the loan size can range from $1,000 to ~~≈$~~$100,000 (the loan size may be larger for SEMP customers or special projects), with a maximum tenor of 5 years for commercial accounts, and 7-10 years for ~~State~~state facilities. Small Business accounts that consume less than 1,~~000 megawatt-hours (~~500 MWh~~)~~ per year are eligible to receive loans that range from $500 to $50,000, with a maximum tenor of ~~five~~5 years. Please note that the Company's On Bill Repayment offering cannot be used to support energy efficiency ~~upgrades~~projects that have a benefit cost ratio less than 1.0.

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~~3.2.4 Serve customers equitably: Design programs with a conscious effort to serve low- and moderate-income; gender, racially and ethnically diverse; and non-native English-speaking customers.~~

### 3.2.4 Priority 4: Serve Customers Equitably

#### Strategic Philosophy

Over the years, the Company's energy efficiency programs have served thousands of customers. Even with this success, the Company continues to strive to reach all its customers, especially those who have not yet participated in the wide range of energy efficiency programs. In particular, the Company seeks to continue to expand its programs' reach to those who are historically underserved, and those who bear the heaviest energy burdens (and thus have the most to benefit from energy efficiency). As the energy and program provider for all customers in its service territory, across all income levels, gender and race categories, and languages spoken, it is the Company's responsibility to ensure that ample benefits are provided to the most vulnerable populations. Therefore, the Company's strategy will be to strive to create a portfolio of programs that are designed to deliver affordable efficiency measures to the historically underserved, and equitably provide benefits to customers across all demographics to improve satisfaction for all customers.

#### Cross-Cutting Tactics

The Company will continue portfolio-wide efforts to ensure programs are accessible to diverse populations (e.g., creating program forms and collateral in multiple languages). The Company will continue to focus on recommendations from the ~~Equity Working Group~~EE EWG and refine metrics to measure progress on the equity front.~~ ~~ The Company is open to discussions with stakeholders on mechanisms for including an equity component in the ~~PIM.~~performance incentive mechanism (PIM).

#### Residential & Income Eligible Tactics

The Company's income eligible air-source heat pump plan specifies that at least 25 percent of the target 750 annual conversions take place at low-income customers' residences. The Company is implementing that plan with trusted vendor relationships in the income eligible community ~~include~~including HVAC and weatherization contractors as well as high performing Community Action Program (CAP) agencies.

~~More generally, the~~The Company will continue to improve its outreach and engagement with community-based organizations~~.~~ and multifamily landlords. One potential component of ~~our~~the Company's outreach strategy would involve using data on deed-restricted housing, to ensure that efficiency work for income-eligible customers remains

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**Commented [RIE19]:** **Adrian Caesar:** Would like to see a plan and timeline for how the Company will engage stakeholders in this matter.

**Commented [RIE19R2]:** Our hope is that a structure for this is proposed by stakeholders as an entry point to discussion.

**Commented [RIE20]:** **Adrian Caesar:** Please include a mention of improving the MF initiatives specifically, as MF buildings are where many of our most vulnerable residents live.

**Commented [RIE20R2]:** Added

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**Commented [RIE21]:** **Susan AnderBois:** This seems like a super small number? How many RIers use electric resistance heat in their homes?

**Commented [RIE21R2]:** The PUC directed RIE to complete the 750 conversions at the December 20, 2022 open meeting regarding the 2023 Annual Energy Efficiency Plan in Docket no 22-33-EE. That 750 number comes from the last Market Potential Study in 2019.

with income-eligible customers (as required in the property deed) as opposed to inadvertently playing a role in converting the property to market-rate housing through efficiency-related capital upgrades. – During the listening lessions, customers recommended the Company resource community-based organizations to reach diverse populations. One suggestion was to partner with local leaders and organizations who have similar ethnic backgrounds and are a part of the community.[15] This aligns with the Company's intent to engage with the historically underserved, and equitably provide benefits to customers across all demographics.

In another effort to equitably deliver ~~program dollars,~~programs this ~~Three-Year~~ Plan will look to address the deferrals and pre-weatherization barriers that stand in the way of many low-and-moderate income customers receiving weatherization services. The Company intends to expand on and refine recent initiatives regarding data tracking of deferrals and pre-weatherization barriers across all Residential ~~home services programs.~~Home Services Programs. The Company plans to collaborate with stakeholders and other groups to assess best practices and new strategies when it comes to addressing pre-weatherization barriers so that the crucial work of weatherizing homes may continue. The Company also intends to identify and compile resources for leveraging funding to address pre-weatherization barriers. While RI Energy cannot guarantee that additional outside resources for pre-weatherization barriers will be secured, the Company will continue to engage with potential funders in pursuit of these resources, including engaging with OER to understand if any IRA funds might be eligible for this kind of remediation.

## Commercial & Industrial Tactics

For the 2024 ~~Three-Year Plan~~-2026 term, the Company will look to deploy additional bilingual auditors who speak Spanish or Portuguese (the two most widely spoken languages besides English in Rhode Island). The Company will also continue to translate marketing material into Spanish and Portuguese to improve outreach and provide more equitable services.

Additionally, the Company will look to continue its commercial Main Streets Initiative. This initiative aims to accelerate the adoption of direct-install efficiency measures for small businesses within a targeted community. Outreach for this initiative includes direct mail and/or social media engagement[16], followed by a door-to-door effort that lasts between

[15] See Attachment 5: 2023 Customer Listening Sessions.

[16] See Attachment 5: 2023 Customer Listening Sessions. Suggestions included an increase in the Company's social media engagement and presence. Some noted how customers receive utility bills electronically, so sending a text promoting energy efficiency programs would be a better way to communicate programs and their benefits to customers.



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**Commented [RIE22]: Steven Chybowski:** Is, or could there be, language in your project agreements that rents won't increase x amount or the property owner has to pay back the upgrade?

**Commented [RIE22R2]:** Will check with internal counsel on feasibility and legality of adding this stipulation. There is some concern, though, that this might add another impediment to implementation and would also be difficult to monitor.

**Commented [RIE23]: Susan AnderBois:** Are you working with any community centers? The Mount Hope Community Center could be a great way to reach a historically black neighborhood in providence.

The South Providence Neighborhood Association might be helpful? There are plenty of these types of neighborhood associations who can help share information.

**Commented [RIE23R2]:** We are working with the City of Providence on energy assessments of a number of community centers. Our intention in 2024 is to expand the reach our communication with community and neighborhood associations.

**Commented [RIE24]: Adrian Caesar:** We'd like a commitment to secure funding and stand up a program to offer this service, rather than exploring it for another year.

**Commented [RIE24R2]:** Updated text

**Commented [RIE25]: Adrian Caesar:** Can you commit to securing these resources as well as identifying them?

**Commented [RIE25R2]:** Difficult to commit to securing resources since those decisions are out of our hands. We will commit, though, to pursuing these resources.

**Commented [RIE26]: William Owen:** Continued development and improvement of these direct connection efforts, particularly in the door to door activity, will likely prove beneficial in future years across deepening and increasingly complex EE activity, as well as AMF deployment, and among other measures developed to meet the Act on Climate and the range of potential decarbonization pathways necessitated by those mandates. Creating relationships and increased familiarity within communities for direct contact with the utility will lay the groundwork for improved reception of those later measures.

**Commented [RIE26R2]:** Thank you for the note William

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three-to-seven days, depending on the number of small businesses or microbusinesses and the size of the target community. In selecting the Main Streets Initiative locations, the Company will prioritize Environmental Justice focus areas.

### 3.2.5 Priority 5: Ensure Workforce Capacity to Serve Customers

#### Strategic Philosophy

The ability of customers to invest in energy efficiency relies on the existence of a robust, well-trained workforce that can deliver high-quality service. For decades, the Company's programs have helped nurture the energy efficiency workforce in Rhode Island. Even still, the state of the current program delivery workforce (e.g., trade allies, vendors, and project expeditors) is sometimes strained in its ability to deliver services in a manner that meets program goals and satisfies customer expectations. The Company knows, for example, that the undersupply of qualified energy auditors, which is seen throughout construction-based fields, results in long wait times for customers, eroding program participation and customer satisfaction.

Boosting capacity alleviates the bottleneck of available labor and affords the Company s the opportunity to address equity issues by expanding the number of minority-owned and women-owned business enterprises that work as primary contractors and subcontractors in program delivery. While development of Rhode Island's workforce is a multi-faceted, statewide effort that extends beyond the borders of the Company, RI Energy plays an important role as a key leader in this effort. The Company recognizes, also, that increased workforce capacity will be critical in meeting the goals set out in the *Act on Climate*.

Therefore, the Company's strategy is to continue taking an active role to help its partners develop the skills and capacity necessary to maximize the impact of program dollars.

#### Cross-Cutting Tactics

The Company's specific role in developing Rhode Island's workforce includes:

- ~~Defining~~Define how large a workforce is needed to successfully deliver programs in the short and long term.
- ~~Expressing~~Identify gaps in the current workforce (e.g., minority-owned business enterprise contractors who serve customers in their preferred language).
- ~~Supporting programs~~Support programs financially and with subject matter expertise that are an effective pipeline for the energy efficiency workforce (e.g., the Residential Construction Workforce Partnership).

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**Commented [RIE27]: Adrian Caesar:** A key part of success in MA for engaging underserved populations through Main Streets has been engagement with business organizations serving the targeted populations. While Chambers of Commerce are good allies, underserved populations are typically less represented by Chambers and may have their own organizations to which they subscribe. The Small Business Process Evaluation has produced data showing participation by Zip Code for small businesses that can inform these efforts.

**Commented [RIE27R2]:** Thank you for this note Adrian. The Main Streets initiative launched in 2023

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**Commented [RIE28]: Adrian Caesar:** In areas like this can we provide incentives to vendors to train and bring more people into the market? They take on significant risk in doing so, hiring people is expensive. The programs could help with this barrier.

**Commented [RIE28R2]:** Thank you for the note Adrian.

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**Commented [RIE29]: Susan AnderBois:** This was going to be my question – thanks!

**Commented [RIE29R2]:** Thanks Sue.

**Commented [RIE30]: Adrian Caesar:** These are bullets about what the Company sees as its role in developing the RI workforce, but falls short of detailing those roles. Would like to see more detail on how the Company goes abou ... [4]

**Commented [RIE30R2]:** Have updated the text. Thank you for your comments.

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**Commented [RIE31]: Adrian Caesar:** Current and future. One issue with workforce development is that it takes ... [6]

**Commented [RIE31R2]:** Thank you for the comment Adrian.

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**Commented [RIE32]: Susan AnderBois:** What does support mean? $$? Hiring workers from these programs?

**Commented [RIE32R2]:** Thanks Sue. Addressed in text.

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~~Workforce~~The Company plans to enhance its workforce development efforts ~~will be enhanced~~ based on the recommendations from the Rhode Island Workforce Needs Assessment Study~~, which was released~~ (Workforce Study).[17] The Workforce Study had four objectives:

**Commented [RIE33]:** Susan AnderBois: When will we see this? Tomorrow is June 30th and the last day of the first half of the year

**Commented [RIE33R2]:** The study is being finalized and formatted

**Commented [RIE34]:** Adrian Caesar: Expect that more detail will be provided in the next draft

**Commented [RIE34R2]:** Additional detail provided below.

1. Quantify the current energy efficiency workforce in ~~Q2 2023.~~ Rhode Island.
2. Uncover the needs of and opportunities for energy efficiency businesses and workers as well as potential energy efficiency workers.
3. Highlight workforce development gaps and potential solutions in the state.
4. Identify potential roles for RI Energy in supporting energy efficiency workforce development in the state.

The Workforce Study resulted in the following key findings:

- The Rhode Island energy efficiency workforce is diversified by technology but not by demography, and employment levels are recovering from COVID-19 impacts but stabilizing at 2016 levels.
- Energy efficiency businesses in Rhode Island have been hiring and expect to hire more workers with different skills sets to grow their businesses.
- Employers expect hiring to be difficult, at least in the near term, as it is taking place in a tight labor market with high competition for these workers.
- At present, there is not significant interest among future workers in filling energy efficiency job openings.
- Rhode Island may struggle to meet its energy efficiency workforce needs due to a lack of focus from key stakeholders and a need for greater coordination across the state's energy efficiency workforce ecosystem.
- The state has positive attributes that will be helpful in creating well-functioning energy efficiency workforce development programs.

Based on the findings of the Workforce Study, the following recommendations for advocates and practitioners operating at the intersection of energy efficiency and workforce issues were made:

[17] [bw] Research, Rhode Island Workforce Needs Assessment Study, 2023.

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1. Prioritize increasing the pipeline of future energy efficiency workers through education, communications, and information sharing.
2. Pursue a comprehensive approach that balances education, training, and certifications, while getting new workers the foundational, in-the-field experience they lack.
3. Actively support efforts to secure initial energy efficiency employment, working with employers and educators.
4. Strengthen educational institutions' emphasis on energy efficiency.
5. Embark on equity-related actions to further increase the pipeline of workers and bring higher-quality job opportunities to underserved communities through expanded alternative pathways, language and wraparound support, and community partnerships.
6. Encourage leadership and collaboration across the Rhode Island energy efficiency workforce development ecosystem.
7. Leverage and scale programs and success stories that already exist in the state.

RI Energy will need to address the following near-term actions identified in the Workforce Study to meet energy efficiency workforce needs:

1. ***Encourage workforce ecosystem coordination and leadership*** by advocating for increased emphasis on energy efficiency and workforce development within relevant state-wide entities and supporting emerging leadership efforts in the state around energy efficiency workforce development. [18]
2. ***Support marketing efforts and pipeline building*** by further leveraging RI Energy's marketing and communications capacity with credible information resources and campaigns and by partnering with groups, especially those serving underserved communities, to raise awareness about the value and opportunities of energy efficiency jobs.

[18] See Attachment 5: 2023 Customer Listening Sessions. Customers suggested collaboration across the workforce development ecosystem.

3. ***Champion energy efficiency-related programs at all levels of education*** by increasing support for specific programs in high schools and vocational-technical schools, including curriculum development, instructor recruitment, internships, and equipment needs.[19]

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

The Company is currently working on improving training for vendors and project expeditors, and the Company has the capacity to increase its focus on code compliance~~. Known~~. Known areas of focus will be zero net energy projects, building operator certification, codes and standards compliance training, weatherization, HVAC system optimization and controls, and general energy efficiency skills, such as auditing and the Association of Energy Engineers' Certified Energy Manager (CEM) certification. Multilingual trainings are currently available and will be expanded to reach more potential members of the workforce.

~~In addition,~~The Company is currently engaged in discussions with a third-party consultant to develop weatherization and heat pump training for contractors.[20] This third-party consultant is a leading industry voice in the transformation of the HVAC market and is a proponent of educating the contractor workforce to effectively engage customers. The training curriculum is still under development, so the exact timing and pricing are unknown, but RI Energy will explore where it can integrate these offerings into its existing curriculum at the proper time.

The Rhode Island ~~House of Representatives passed~~ General Assembly's recent legislation (H6101/S0855 Sub A ~~which)~~ requires the ~~state to adopt~~Rhode Island's adoption of the 2024 International Energy Conservation Code (2024 IECC) within ~~3~~three months of publication (expected to be January of 2024). The law requires adoption with no weakening amendments and a plan for 90~~%~~ percent compliance within ~~6~~six months for residential and commercial new construction and renovations.

[19] See Attachment 5: 2023 Customer Listening Sessions. Participants recommended workforce strategies to increase program participation including partnering with career offices at the Community College of Rhode Island, and local high schools, colleges, and universities to leverage and access younger adults with internship opportunities.

[20] See Attachment 5: 2023 Customer Listening Sessions. Customers suggested more training and guidance for contractors to promote decarbonization strategies such as weatherization and heat pumps.

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**Commented [RIE35]: Adrian Caesar:** We definitely need training in HVAC system optimization and controls. Should also mention training for bilingual/multilingual members of the workforce

**Commented [RIE35R2]:** Thank you for the comment, and agreed opening up training for bilingual/multilingual members. Have added to the text.

**Commented [RIE36]: Steven Chybowski:** With new legislation mandating the adoption of the 2024 codes, I believe there will be a need for increased training and compliance on codes

**Commented [RIE36R2]:** Addressed in text. Thank you for the comment.

~~The~~ Recently, the Company's Codes & Standards program team met with the RI Code Commissioner to begin the process of scheduling mandatory trainings for building officials. ~~-~~The Company~~, through~~ and its third-party code support contractor~~, CLEAResult,~~ will ~~be augmenting~~augment code update trainings for all industry professionals~~.~~, details of which can be found in the 2024 Annual Plan.

Depending on the timing of code adoption, enhanced training activity will occur in 2024 and 2025 to the extent necessary, and then return to a baseline level in 2026. The change in the residential code will likely result in the industry shifting away from prescriptive pathways to a performance-based pathway for compliance, which involves an energy rating. More Home Energy Rating System (HERS) Raters will be needed to meet this demand and will be a focus of workforce development efforts over the 2024-2026 ~~program cycle.~~ term. The IRA has allocated funding to assist states in adopting the current energy code (or a zero-energy code) and implementing a compliance plan. ~~-~~OER will administer this funding and the Company will work with ~~OER~~the agency to collaborate on this workforce development effort.[21]

~~The Company anticipates making investments in workforce development in this Three-Year Plan including:~~

The Company is also coordinating closely with the Rhode Island Builders' Association (RIBA) to promote code awareness and training to its members and partners, such as the lumber yard industry that is critical to the building supply chain. The National Association of Home Builders, RIBA's national affiliate, is developing code training curriculum, and Rhode Island will be the first state to use this curriculum when it adopts the 2024 IECC.

The Company includes initiatives in workforce development in this Plan including:

- Providing training to the residential efficiency workforce and technical students.
- Enhancing continuing education for building managers and facilities operators.
- Educating current vocational students about opportunities in the energy efficiency field.
- Increasing the supply of ~~residential energy raters~~HERS Raters.

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[21] See Attachment 5: 2023 Customer Listening Sessions. More collaboration across the workforce development ecosystem was encouraged by customers.

These efforts will be coordinated across ~~both~~ the Company's C&I and ~~residential~~Residential teams, along with the appropriate state and local authorities, to ~~reduce or eliminate duplication~~maximize the impact of ~~effort and expenditures~~the incremental initiatives that will be undertaken.

### 3.2.6 2024-2026 ~~Efficiency Plan~~ Program Updates

The ~~company~~Company anticipates making the following enhancements and changes to the programs for the 2024-2026 ~~plan~~Plan.

#### Residential ~~**Offerings**~~Programs

*EnergyWise Single Family (Electric and Gas)*

- ~~Coordinate with OER's Clean Heat RI Program.~~
- Coordinate with OER's Clean Heat RI Program.
- Coordinate with OER to leverage additional federal funding opportunities (e.g., ~~ARRA~~ARPA, IRA).[22]
- Leverage the high-cost effectiveness of weatherization measures and heat pump installations by offering additional funding to remediate pre-weatherization barriers (up to the point of cost effectiveness for both measures).
- Improve data collection efforts around pre-weatherization barriers, to better understand their impact on energy efficiency progress.
- Collaborate with stakeholders and other groups to assess best practices and new strategies to address pre-weatherization barriers (also applicable to ~~Income Eligible Services program).~~ the IES Program).

[22] See, Attachment 5: 2023 Customer Listening Sessions. Several participants talked about how the integrated delivery of federal and state programs, "sometimes the combined programs makes it more worthy," and ensures customers are aware of all incentives.

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*Multifamily (Electric and Gas)*

- Use the Heat Pump Market ~~Research Study~~research study results, including landlord interviews, to target landlords for heat pump upgrades and other applicable energy efficiency measures (also applicable to C&I Multifamily Program~~)~~).[23]
- Work to establish a pilot program around one or more new financing options for ~~multi-family~~ multifamily buildings (also applicable to the C&I Multifamily Program).

*Income Eligible Services (Electric and Gas)*

- Ensure the IES ~~program~~Program is delivered equitably, with the input and guidance of the ~~Rhode Island~~EE EWG.
- Address the deferrals and pre-weatherization barriers that stand in the way of many low-and--moderate income customers receiving IES program services.
- Expand on and refine recent initiatives regarding data tracking of deferrals and pre--weatherization barriers across all Residential Home Services programs.
- Collaborate with stakeholders and other groups to assess best practices and new strategies to address pre-weatherization barriers.
- Identify and compile resources for leveraging funding to address pre-weatherization barriers.

*Residential New Construction*

- Revise the RNC program guidelines to reflect changing baseline assumptions.
- Increase the number of projects achieving advanced and sustainable building standards and certifications such as Zero Net Energy and Passive House.
- Determine needed implementation changes based on an ongoing User Defined Reference Home (UDRH) study.

[23] See, Attachment 5: 2023 Customer Listening Sessions. Several participants talked about the need for more landlord education regarding the programs to help tenants get access to the energy efficiency programs.

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*Home Energy Reports (Electric and Gas)*

- Explore tailoring HER program to target specific audiences (e.g., high users).
- Explore increasing messaging to Automated Metering Frequency (AMF) customers.

*Residential Consumer Products (Electric)*

- No major changes planned.

*Residential High-Efficiency Heating, Cooling, and Hot Water (Electric and Gas)*

- Target electric heat resistance customers for heat pump upgrades as outlined in the Company's *Electric Resistance Heating to Air Source Heat Pumps: Implementation Plan for the Income Eligible Sector* (also applicable to Income Eligible Services program).
- ~~Coordinate with OER's High-Efficiency Heat Pump Pilot Program.~~
- Coordinate with OER's Clean Heat RI Program.
- Research opportunity to implement right-sizing incentives for fossil fuel equipment and options for optimizing electric versus gas.
- Coordinate with OER to leverage additional federal funding opportunities (e.g., ARRA, IRA).
- Coordinate with OER on HVAC workforce development in 2024.

## Commercial and Industrial Offerings

*New Construction*

- ~~The Commercial and Industrial~~Redesign C&I New Construction program ~~underwent a program redesign~~ to simplify the pathways for participation~~; the~~. The Company is anticipating those changes will result in additional program activity during ~~Program Years~~the 2024-2026 term.
- Revise the Large Commercial New Construction program guidelines to reflect changing baseline assumptions, moving from IECC 2018 to IECC 2024 as it is adopted.
- ~~Changes to~~Change Upstream New Construction baseline assumptions for ~~Food Services and~~commercial food services HVAC equipment based on federal standards.

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**Commented [RIE39R2]:** Updated the text.
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*Retrofit*

- The Company will look to deploy a data-driven approach to increasing customer participation in the ~~commercial and industrial~~C&I sector.
- Analyze customer consumption data (kWh, peak load, and therms) and past energy efficiency participation to better target customers, especially non-participants.
- Expand the reach of its ~~Strategic Energy Management Planning (SEMP)~~SEMP initiative to support the increasing number of customers with climate and sustainability goals.
- Expand services supporting more advanced system controls, energy management systems, and building analytics.
- Enhanced incentives to customers that commit to implementing comprehensive energy efficiency measures.
- Enhance continuing education for building managers and facilities operators.[24]
- Work with OER to better understand electrification efforts being funded through ~~State~~state and ~~Federal~~federal programs.
- Promote prescriptive and custom offerings to promote commercial weatherization and greenhouse gas emissions reduction.

*Small Business Direct Install*

- Promote prescriptive and custom offerings to promote commercial weatherization and greenhouse gas emissions reduction including the development of prescriptive weatherization and air sealing offerings.
    - ~~Further promote~~ RI Energy is currently working on a custom express tool for Rhode Island similar to that used in Massachusetts. The Company is currently running an assessment to develop this tool which will launch in 2024. While launching this tool, the Company will leverage lessons learned from previous commercial weatherization offerings through RGGI funds to ensure a successful launch and implementation. These lessons include understanding the importance of staying ahead of market

[24] See Attachment 5: 2023 Customer Listening Sessions. Customers suggested the Company offer Building Operator Certification training.



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**Commented [RIE40]:** Adrian Caesar: Good, but need more details. Targeting high energy users could be viable, but the analysis may need to consider differences in consumption not attributable to participation/non-participation in the programs to some degree (e.g. sorting by both customer size and building type)
**Commented [RIE40R2]:** Further details on this approach outlined in the annual plan
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**Commented [RIE41R2]:** Added text around lesson ... [92]
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**Commented [RIE42R2]:** We are working on a cust ... [94]

shifts by being proactive with relevant trainings and education material for those completing weatherization related projects.

- Complete three Main Streets ~~initiative~~initiatives in Environmental Justice Focus Areas.
- Deploy multilingual marketing materials and program materials.
  - Spanish and Portuguese are the two most widely spoken languages, aside from English in Rhode Island. Marketing and program materials will be translated into these languages.[25]
- Work with OER to better understand electrification efforts being funded through ~~State~~state and ~~Federal~~federal programs.

## 3.3 ~~Multiyear~~Multi-year Strategies

The PUC has directed the Company to identify investment strategies for which implementation and budget requests (or revenue collection) are expected to span multiple years. ~~There is no such multi-year commitment envisioned for the 2024-2026 planning cycle~~There is no such multi-year commitment envisioned for the 2024-2026 term. Several of the initiatives outlined in the Plan will continue throughout the three years of the plan, including efforts to address pre-weatherization barriers, integration and coordination with OER regarding IRA programs, and many others, but per the Standards, multiyear strategies are specifically tied to budget requests that span several years. No current requests span more than the parameters of an annual program plan.

## 3.4 Coordination with Other Programs and Policies

Continuing to provide the best value to Rhode Island customers necessitates that the Company coordinate with other parts of the energy system. For the 2024-2026 ~~Three-Year~~ Plan ~~the Company~~, RI Energy will continue to implement the energy efficiency portfolio of programs in coordination with other Company filings and activities, as described below. Efforts have also been taken to ensure the Plan is aligned with relevant state policies and objectives~~, with~~ and specific coordination opportunities are identified below.

[25] See Attachment 5: 2023 Customer Listening Sessions. Participants suggested translating marketing and program materials would increase participation as well as bilingual education and outreach at events to reach more diverse communities.

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Commented [AC43]: What does "further promote" entail? There was one Main Street effort conducted in East Providence, but does this mean additional ones will be done there? Or will vendors move onto other areas? Just wondering what can be done to make the Main Streets more effective and enable them to serve more customers/result in longer-term relationships

Commented [RIE43R2]: We committed to completing 3 Main streets in 2022. Two have been completed with one more planned for the fall. We plan on completing another 3 main street efforts in 2024 moving to other EJ Areas on the map.

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### 3.4.1 System Reliability Procurement

~~Rhode Island~~Based on the latest changes to the Standards, demand response programs will fall under SRP starting in 2024. RI Energy will continue to coordinate across energy efficiency programs and ~~system reliability procurement.~~SRP. For the 2024-2026 term, this coordination includes, but is not limited to, supporting market engagement efforts for non-wires and non-pipes solutions, conducting locational outreach for energy efficiency~~/demand response~~ measures that may preemptively alleviate grid needs to some extent, and supporting internal evaluation of energy efficiency~~/demand response~~ as a non-wires or non-pipes solution. ~~Rhode Island Energy~~The Company will coordinate internally through overlapping staffing assignments and anticipates support for coordination through external stakeholder engagement.

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### 3.4.2 Advanced Metering Functionality and Grid Modernization

The deployment of ~~Advanced Metering Functionality (~~AMF~~)~~ in the Company's service territory will enable the near real-time collection of granular customer energy usage data. The availability of this data in turn enables enhancements to energy-~~-~~efficiency program design and implementation. AMF data can be used to target programs, identifying customers who are likely to benefit the most from program participation (and the converse, customers who are least likely to benefit). The analysis of AMF data can provide the Company with real-time views of program performance, enabling enhanced program management (adjusting program approaches during the year based on observed performance), faster and more immediately actionable ~~evaluation, measurement, and verification (EM&V).~~EM&V. The availability of real-time program performance data also creates the potential for expanded pay-for-performance ~~(P4P)~~ programs.

Currently, the Company's plan for AMF meter deployment begins in ~~Q3~~Q4 2024, with continual deployment expected to go through ~~the end~~Q1 of ~~2025~~2026. Therefore, in the 2024 Annual Plan, the Company will not plan for activities that rely on AMF, but rather plan activities which lay the groundwork for implementing the program enhancements listed above in future years. As AMF is gradually deployed throughout 2025 and 2026, in the development of the 2025 and 2026 Annual ~~Plan~~Plans, the Company plans to explore ways to pilot AMF-enabled offerings with customers who have received AMF meters~~. Building off the groundwork laid in 2024 and the insights gained in 2025, the Company plans to roll out AMF-enabled program designs at scale in the 2026 Annual Plan.~~. Based on learnings from these pilots, the Company will identify potential full-scale programs to launch in the 2027-2029 planning cycle. These plans are contingent on the progression of the Company's AMF deployment and so are subject to change.

**Commented [RIE47]: Steven Chybowski:** Good – start piloting the programs once some of the meters are deployed so that they may be ready to go for full launch once AMF deployment is complete

**Commented [RIE47R2]:** Revised based on current timeline - programs based on full deployment cannot be launched during this 3-year cycle.

### 3.4.3 Act on Climate

The ~~2021~~ *Act on Climate* ~~Legislation~~ sets mandatory, enforceable, ~~state-wide~~statewide, economy-wide greenhouse gas emissions reduction targets of 10~~%~~ percent below 1990 levels by 2020~~;~~, 45~~%~~ percent below 1990 levels by 2030~~;~~, 80~~%~~ percent below 1990 levels by 2040~~;~~, and net-zero emissions by 2050. ~~–~~

The Company is actively participating in the ramp up to the *2025 Climate Strategy*, having submitted comments to the State's Request for Information to Support the Development of a Scope of Work for the Climate Action Strategy ~~today~~. The energy savings achieved by ~~Rhode Island~~RI Energy's ~~energy~~ efficiency programs directly ~~advances~~advance priority actions identified by the ~~Rhode Island Executive Climate Change Coordinating Council (~~EC4~~)~~ in their *2022 Climate Update* to the *2016 Greenhouse Gas Emissions Reduction Plan*.

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

- **Priority Action for the Electric Sector: Continue Energy Efficiency Work**
  - This Plan addresses key items highlighted in this action item and will lower energy bills, reduce greenhouse gas emissions, and support local and state economies.
- **Priority Action for the Thermal Sector: Continue Energy Efficiency Programs and Weatherization**
  - Weatherization programs remain a focus of both Residential and IES programs. The Company collaborates with weatherization contractors and Community Action Agencies to continually refine the delivery mechanisms for weatherization services to both expand their reach and reduce barriers to participation.
- **Priority Action for the Thermal Sector: Target 15% Penetration of Energy Efficient Electric Heating by 2030**
  - This Plan continues the Company efforts to support the adoption of electric heating, with a particular emphasis on electric resistance heating customers.
- **Priority Action for the Thermal Sector: Efficient Heat Pump Incentives**
  - Several programs outlined in this Plan offer incentives for efficient heat pumps, both for space and water heating.
  - The Company has collaborated with OER on their Clean Heat RI Program and will continue the collaboration to align program incentives for heat pump technologies with IRA incentives.

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### 3.4.~~5~~4 Future of Gas Docket

~~The Public Utility Commission~~The Company does not anticipate that the PUC's Docket 22-01-NG Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island as it pertains to the *Act on Climate* ~~is unlikely to~~ will impact the 2024 ~~annual plan and it~~Annual Plan. It is uncertain whether the ~~Docket~~docket and/or subsequent rulings could impact the latter years of this ~~Plan.~~2024-2026 Plan. It is, however, worth highlighting that the Company is making adjustments to gas incentives, including substantial decreases, driven by an evaluation of which efficiency measures deliver net benefits. Answers to the larger policy questions being addressed in the Future of Gas docket, and which are beyond the scope of the Company's net benefits analysis, should be aligned with the findings and recommendations made by the PUC at the conclusion of the proceeding. In fact, the range of decarbonization scenarios being contemplated in the Future of Gas docket may include the continued need for efficient gas furnaces. As such, it ~~would be premature to take steps towards phasing~~is prudent to defer the decision to phase out ~~such~~gas energy efficiency incentives in their entirety until the Company has clear visibility into the PUC's preferred decarbonization pathways and how those might impact customer gas demand ~~on~~ and ~~usage~~use of the natural gas system.

### 3.4.~~6~~5 Office of Energy Resources ~~(OER)~~

The OER has been allocated $25 million in ~~American Rescue Plan Act (~~ARPA~~)~~ funding to develop and implement their ~~High-efficiency~~Clean Heat ~~Pump~~RI Program ~~(HHPP).~~. The Company and OER have communicated throughout the development of this program to coordinate, to the extent possible, the Company's efficiency program offerings with those of the ~~HHPP, with a goal of simplifying the process for customers interested in this technology. We~~Clean Heat RI Program. The goal is to simplify the process for customers interested in this technology. During the initial stages of this program, OER will focus their incentives on heat pump replacement projects that are not eligible for Company incentives, specifically those customers currently using natural gas heating. The parties will continue to collaborate on technical specifications for equipment, cross-marketing programs and coordinating application processes.

### 3.4.6 Federal Funding

RI Energy will continue to collaborate with OER as they develop programs to spend federal funding provided through ~~the Inflation Reduction Act (IRA).~~ IRA. Most of that funding, nearly $64 million, will go towards rebates for residential energy efficiency and electrification measures. ~~Again, we are prioritizing~~The Company will prioritize clarity for customers and participants as to the best pathways for them to access the appropriate incentives and rebates for their

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**Commented [RIE48]: Steven Chybowski:** I wouldn't agree with this statement and think there are opportunities within the EE plan to start charting new paths based on the discussions that have occurred to date

**Commented [RIE48R2]:** Please note that in section 3.2.2 the Plan outlines changes to gas incentives. We have begun charting the path but are awaiting further PUC guidance ahead of a complete phase out of gas incentives.

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The Company will prepare a preliminary plan document by the end of Q2 2024 that outlines an approach and timeline for coordination with OER regarding IRA incentives. This plan will include a customer outreach strategy, identify resources for contractor education, propose customer pathways for accessing IRA funds (both in addition and in lieu of Company incentives), initial projections for IRA incentive uptake, financial implications for Company incentives for measures eligible for both IRA and program incentives, preliminary financing options, income verification pathways, and a methodology for savings attribution.

The Company will use resources from industry groups and through direct contact to keep abreast of what other states and utilities are planning for IRA implementation, in order to discern best practices and lessons learned. The Company will also participate in NEEP's IRA attribution working group to focus on that issue and determine the best path forward.

Regarding Demand Side Management (DSM) proposals, at this time the Company is not planning on submitting a DSM proposal for 2024. RI Energy intends to maximize the contributions from IRA funds in conjunction with its Energy Efficiency Programs first and will revisit the additional value of a DSM proposal as the Company learns about the effectiveness of IRA implementation.

The Company has a history of collaboration with OER and has administered a Heat Pump Program for delivered fuel customers, funded by RGGI dollars allocated to the Company by OER, for several years. The Company and OER regularly communicate with regards to IRA plans and will schedule a regular cadence of touchpoints as more details are unveiled. There remain several unknowns about the ultimate design of the IRA incentive programs, but as OER moves toward launch, answers to the questions outlined above will help ensure Company programs and IRA funds complement each other in providing energy savings for customers.

One IRA-related action that RI Energy and OER have already begun collaborating on is working with Rewiring America to develop a customized online calculator, which will provide Rhode Island residents with an estimate of IRA and utility

[26] See Attachment 5: 2023 Customer Listening Sessions. Suggestions for the Company to coordinate its energy efficiency programs more with state and federal programs.



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Commented [RIE49]: Steven Chybowski: OER will also help cross promote programs – for example, if a customer is ineligible for any State or Federal programs, but may be eligible for a RIE program, we will help steer them to RIE and hope RIE will do the same with State programming

Commented [RIE49R2]: Excellent, thanks Steve. Also augmented text.

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program incentives they may be eligible for when considering projects. Rhode Island will be the first state to publish such a tool with Rewiring America. The team will devise a mechanism to update the tool as changes to program incentives occur to assure that users get accurate, current information.

In addition to IRA funding, the Bipartisan Infrastructure Law has allocated $550 million to expand DOE's existing Industrial Assessment Center (IAC) program.[27] The Company has been in discussions with both Community College of RI and Worcester Polytechnic Institute with regards to their applications to DOE to establish IACs at their institutions.[28] These programs will provide training for students through new classroom curricula and hands-on field experience providing energy assessments to small and medium sized manufacturers in Rhode Island. RI Energy has committed to working with both schools, should their applications be accepted, by connecting them with enterprises that would be good candidates for energy assessments and providing funding to support energy assessment activity. These IACs would adhere to Justice40 guidelines, and each school has a diverse student body that would benefit from expanded opportunities in the field of building science. If awarded, these IACs would conduct energy assessments and provide additional workforce capacity, especially for evaluating the energy performance of smaller enterprises.

## 3.5 Evaluation Plans

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As program offerings continue to evolve, ~~Rhode Island~~RI Energy intends to deploy ~~evaluation, measurement, and verification (~~EM&V~~)~~ studies to support that evolution while, at the same time, using the studies to verify reliable program savings. Among the themes that the Company expects to address over the course of the ~~three-year~~2024-2026 term in evaluation are:

- Future of incentives for efficient lighting and claimable savings from lighting.
- Support for the adoption of heat pumps.
- Options for gas energy efficiency program evaluation under the *Act on Climate*.
- ~~Productive~~How effective is the coordination and interaction between federally funded energy efficiency and ~~Rhode Island~~RI Energy's programs; ~~the~~if programs are well coordinated, there will be minimal overlap of effort

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[27] Department of Energy, "Industrial Assessment Centers" webpage.

[28] See Attachment 5: 2023 Customer Listening Sessions. Participants recommended workforce strategies to increase program participation including partnering with career offices at the Community College of Rhode Island, and local high schools, colleges, and universities to leverage and access younger adults with internship opportunities.

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and free ridership impact. The Company will also ensure that its EM&V activities conform to relevant ~~EM&V~~ requirements of ~~the~~ federal programs.

- ~~Leveraging Advanced Metering Functionality in EM&V~~
- Leverage AMF in EM&V activities where feasible and practical, noting that a sufficient number of meters will need to be in place before AMF can be used for evaluation.
- Aspects related to the adoption of the 2024 IECC.

Plans for specific EM&V studies will be included in each Annual Plan.

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# ~~4.~~ Section Four: Savings Goals, Budgets, and Funding Plan

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This section provides the numerical energy and demand savings goals for the ~~three years addressed by the plan.~~2024-2026 term. Goals are presented in units of lifetime savings (MWh for electric and MMBtu for gas), annual savings, and all-fuels MMBtu savings. Carbon reductions are calculated and reported as a secondary goal consistent with the Standards and the *Act on Climate*. This section describes the Company's development of its savings goals.

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## 4.1 Three-Year Goals

The Company developed its projected savings goals for the 2024-2026 term by considering recent program achievements, market dynamics shaping energy efficiency adoption, recent evaluation results, and proposed program design changes. ~~The Company~~RI Energy also factored input from stakeholders and the public, as described above. Finally, the MPS Refresh offered insights into potential areas of savings growth. Using this information, ~~Rhode Island Energy~~the Company developed measure and program level estimates of savings and aggregated these up to sector and portfolio levels.

The Company similarly calculated spending required for customer incentives to achieve the savings goals and developed budgets for program administration, marketing, and evaluation, building on recent program experience. In developing budgets and the savings that could be achieved within those budgets, ~~Rhode Island~~RI Energy also gave considerable weight to recent ~~Commission~~PUC guidance about limiting year-over-year growth in program budgets. While most focus in detailed planning is given to the 2024 program year, the Company adjusted savings estimates for the 2025 and 2026 program years to reflect program changes over the term. Table 1~~Table 1~~ below summarizes the Three-Year Electric Portfolio Savings and *Table* 2~~Table 2~~ summarizes the gas portfolio savings for the 2024-2026 term.

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*Table ~~2.~~1. 2024 – 2026 Electric Portfolio Savings Summary*

| Electric Programs | | | | 2024 |
|---|---|---|---|---|
| **Savings and Benefits** | | | | |
| Annual Electric Savings (MWh) | | | | ~~93,101~~95,193 |
| ~~Annual Delivered Fuel Savings (MMBtu)~~ | ~~47,806~~ | ~~51,109~~ | ~~54,335~~ | |
| ~~Annual Total Savings (MMBtu)~~ | ~~353,511~~ | ~~365,523~~ | ~~378,958~~ | |
| Lifetime Electric Savings (MWh) | | | | ~~736,591~~733,83 |
| ~~Lifetime Delivered Fuel Savings (MMBtu)~~ | ~~946,483~~ | ~~1,000,773~~ | ~~1,055,445~~ | |
| ~~Lifetime Total Savings (MMBtu)~~ | ~~3,400,150~~ | ~~3,615,308~~ | ~~3,826,813~~ | |
| Net Annual Summer Demand Savings (kW)~~*)~~ | | | | ~~57,044~~15,303 |
| Net Annual Winter Demand Savings (kW) | | | | ~~14,626~~12,971 |
| Total Benefits (RI Test) | $195,697,124 | $205,676,016 | $213,803,119 | |
| Annual Carbon Reduction (Short Tons) | | | | 39,~~782~~868 |
| Lifetime Carbon Reduction (Short Tons) | | | | ~~362,021~~347,92 |
| ~~Total Benefits (RI Test)~~ | ~~$210,509,820~~ | ~~$231,948,908~~ | ~~$241,348,930~~ | |
| **Costs~~*~~** | | | | |
| **Total Funding Required** | | | | **$~~103,856,420~~96 45,723** |
| Cost per Lifetime kWh | | | | $0.~~161~~151 |
| EE Program Charge per kWh | | | | $0.~~0128~~20105 |
| **Benefit Cost Ratio (RI Test)** | | | | **1.~~74~~70** |

~~* kW and Costs include Residential and Commercial ConnectedSolutions demand response programs, for illustration purposes; these programs may be moved outside of the energy efficiency programs.~~

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*Table ~~3.~~2. 2024-2026 Natural Gas Portfolio Savings Summary*

| Natural Gas Programs | 2024 |
|---|---|
| **Savings and Benefits** | |
| Annual Natural Gas Savings (MMBtu) | ~~316,946~~312,846 |
| Lifetime Natural Gas Savings (MMBtu) | 3,~~438,182~~289,03 |
| Total Benefits (RI Test) | $~~77,998,72~~380,1 6,139 |
| Annual Carbon Reduction (Short Tons) | 18,~~610~~392 |
| Lifetime Carbon Reduction (Short Tons) | ~~202,612~~194,181 |
| **Costs** | |
| **Total Funding Required** | **$~~37,620,26~~234, 73,768** |
| Cost per Lifetime MMBtu | $0.~~013~~012 |
| Residential Energy Efficiency Program Charge per Dth | $1.~~152~~095 |
| C&I Energy Efficiency Program Charge per Dth | $0.~~629~~821 |
| **Benefit Cost Ratio (RI Test)** | **1.~~72~~92** |

Below please find an explanation of some of the considerations used in preparing the savings, budgets, and benefits in Tables 2 and 3.

## Residential and Income Eligible Services

*EnergyWise Single Family*

~~LED lighting~~ Starting in 2024, the program will no longer ~~be offered starting in 2024~~ offer LED lighting resulting in the decrease in MWh savings seen in 2024. Over the ~~course of~~ 2024~~, 2025 and~~ -2026 term, the program anticipates growth of heat pump adoption through a concierge service ~~with RISE~~administered by a third party to assist customers with heat pumps. In addition, ~~we expect~~the Company expects growth through emphasis on weatherization of electrically heated homes to help mitigate some of the losses associated with the sunsetting of the program's lighting ~~offer.~~ offering. Gas savings are estimated to grow modestly as of some of the inflationary economic pressures that have suppressed participation across the programs begin to ease and strategies to overcome pre-weatherization barriers are implemented, expanding the pool of potential participants.

*EnergyWise ~~Multi-Family~~Multifamily*

Starting in 2024, the EnergyWise ~~Multi-Family market rate~~Multifamily Market Rate and ~~Income Eligible programs~~IES Programs will no longer offer lighting measures ~~in 2024. It is anticipated~~. The Company anticipates that the decline in electric savings due to the elimination of lighting will be balanced by the increased uptake of heat pump replacements



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resulting from a more focused and strategic approach to targeting ~~multi-family~~multifamily property owners for heat pump upgrades.

Gas savings are estimated to grow modestly as some of the inflationary economic pressures that have prevented ~~multi-family~~multifamily property owners from undertaking capital improvements begin to ease. The Company is also optimistic about the potential for new financing options for the ~~multi-family~~multifamily sector.

*Income Eligible Services*

The Single~~-family Income Eligible Services~~-Family IES Program will no longer offer lighting measures in 2024. The decline in anticipated electric savings is tempered by the addition of more electric resistance to electric heat pump replacements. Gas savings are forecasted to decline as customers transition gas heated residences to electrically heated homes and there are fewer heating system replacements and potentially lower weatherization opportunities.

*Residential New Construction*

The ~~RNC program~~Residential New Construction Program is currently projecting an increase in electric savings and a decrease in gas savings as ~~we anticipate~~the Company anticipates the continuing trend of phasing out gas incentives. The higher electric savings in 2024 relative to 2025 and 2026 are based on ~~our~~the Company's projections from ~~our~~its existing pipeline of work. One thing to note is that current 2024-2026 numbers may be revised as ~~we continue~~the Company continues to evaluate the impact of updated UDRH baselines on the program.

*Home Energy Reports*

The Home Energy Reports Program has been offered in Rhode Island for ~~ten~~10 years. As the program continues, the degree of savings declines as customers move or opt out of the offering. There is a natural decline in year-over-year savings until enough new customers are available to create a new cohort of customers.

*Residential Consumer Products*

The primary reason for the decrease in 2024 is based on ~~our~~the Company's evaluation of the program in 2023, as well as decreased consumer spending due to the current economic environment. ~~We anticipate~~The Company anticipates a slight rebound in the 2025 and 2026 program years.

*Residential High-Efficiency Heating, Cooling, and Hot Water*

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~~We anticipate~~The Company anticipates a large increase in 2024 due to ambitious heat pump targets. Additionally, ~~we are~~RI Energy is raising ~~our~~its goal in general as the HVAC program has been outperforming its goals in recent years. ~~We~~The Company also ~~anticipate~~anticipates additional savings ~~as OER launches their own heat pump program.~~from OER's Clean Heat RI Program. On the gas side, ~~we anticipate~~the Company anticipates decreased savings as ~~we shift~~it shifts away from gas appliances towards electric units.

## Commercial and Industrial (Electric)

*Code Impacts*

Listed below are the anticipated per unit percent savings ~~reductions~~reduction that are likely to occur after the adoption of a new code standard. For the purposes of this forecast, ~~we are~~the Company is assuming these changes will be implemented as of January 1, 2024.

~~*Table 4. Anticipated per unit savings reductions due to new code (Electric)*~~

| Electric Measures | Per Unit % Savings Reduction |
|---|---|
| 2023 Fryer | 32% |
| 2023 Convection Oven | 46% |
| 2023 Combination Oven | 73% |
| 2023 Steamer | 89% |
| 2023 1/2 Size HFHC | 45% |
| 2023 3/4 Size HFHC | 25% |
| 2023 Full Size HFHC | 81% |

| Dishwasher Measures | Per Unit % Savings Reduction |
|---|---|
| Low Temp Under Counter | 35% |
| Low Temp Stationary Single Tank Door | 91% |
| Low Temp Single Tank Conveyor | 67% |
| Low Temp Multi Tank Conveyor | 66% |
| High Temp Under Counter | 37% |
| High Temp Stationary Single Tank Door | 82% |
| High Temp Single Tank Conveyor | 59% |
| High Temp Multi Tank Conveyor | 76% |



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|---|---|
| High Temp Pot, Pan, and Utensil | 58% |

| HVAC | Per Unit % Savings Reduction |
|---|---|
| Unitary Air Conditioning Units | |
| Heat Pumps | ~40% |

##### *Retrofit*

The C&I Electric Retrofit Three Year Plan represents a significant increase in savings derived from HVAC and Motor and Drives end-uses. The increased HVAC savings can be attributed to the ramping up of the Building Analytics Program and deployment of the Energy Management System prescriptive tool, coupled with increased incentives. Additionally, the Company expects the Industrial initiative to perform more energy conservation measures related to Motors and Drives as the lighting market continues to saturate. ~~Please find the section below that provides a more quantitative analysis of the changes occurring during the 2024-2026 Three Year Plan.~~

- The 2024 Retrofit Plan represents a 1,191,227 increase in gross annually kWh above the 2023 Retrofit Planned values.
  - The 2025 Retrofit Plan accounts for a 1,783,336 increase in gross annual kWh above the 2023 Retrofit Planned values.
  - The 2026 ~~Commercial and Industrial~~C&I Electric Retrofit Plan includes a 3,564,847 annual gross kWh increase above the 2023 Retrofit Planned Values.
- The 2026 Retrofit Plan accounts for ~~a nearly~~an approximately 66~~%~~ percent gross annual kWh increase in HVAC related savings above the 2023 Planned values.
  - The 2024 Planned HVAC savings represent a 15% increase above 2023 Planned values.
  - The Company has planned a 44% increase in HVAC related savings from 2024 to 2026.
- The 2026 Retrofit Plan includes a 63~~%~~ percent gross annual kWh increase in Motors and Drives related savings above 2023 Planned values. This includes a 44~~%~~ percent increase in planned Motors and Drives savings from 2024 to 2026.

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##### *New Construction*

The Electric New Construction ~~Three Year~~2024-2026 Plan assumes a roughly 40~~%~~ percent decrease in savings for unitary ~~Air Conditioners~~air conditioners and ~~Heat Pumps~~heat pumps due to code. ~~Additionally, the~~The Company has factored in several claimable savings reductions linked to ~~Food Service~~food service equipment due to ~~advancements~~advances in ~~Code~~code (see table above for impacts). To account for these savings reductions, the Company has planned for significant increases within the ~~Three-Year~~New Construction Plan related to HVAC and Custom projects. The Company anticipates these savings levels will be achieved in~~-~~ part through the new streamlined C&I New Construction ~~program~~Program design and through incremental process improvements and outreach strategies.

- The 2024 Electric New Construction Plan accounts for a 1,935,683 gross annually kWh increase above 2023 Retrofit Planned values.
    - The 2025 Electric New Construction Plan accounts for a 2,583,828 gross annual kWh increase above 2023 New Construction Planned values. ~~The 2026 Commercial and Industrial Electric New Construction Plan includes a 3,446,843 annual gross kWh increase above the 2023 New Construction Planned values.~~
    - The 2026 Electric New Construction Plan includes a 3,446,843 annual gross kWh increase above the 2023 Electric New Construction Planned values.
- The 2026 Electric New Construction Plan includes an 18~~%~~ percent gross annual kWh increase in HVAC related savings above 2024 planned values.
    - The 2025 Electric New Construction Plan includes an 8~~%~~ percent increase in gross kWh savings from HVAC end-uses above 2024 Planned values.
    - The 2026 Electric New Construction Plan includes an above 9~~%~~ percent increase in gross kWh savings from HVAC end-uses above the 2025 Planned values.
- Please note that this accounts for an expected 40~~%~~ percent decrease in claimable savings due to updates to Code ~~Standards~~standards beginning in 2024.
- The 2024 Electric New Construction Plan includes a 20~~%~~ percent increase in gross annual kWh savings attributed to Custom projects above 2023 Planned values.

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- The 2026 Electric New Construction Plan accounts for ~~a nearly~~an approximately 49~~%~~ percent increase in gross annual kWh savings from Custom ~~Projects~~projects above the 2023 Planned values.

## Commercial & Industrial (Gas)

### *Code Impacts*

~~List below are~~The Company has listed the anticipated per unit percent savings ~~reduction~~reductions below that are likely to occur after the adoption of a new code standard. For the purposes of this forecast, ~~we are~~RI Energy is assuming these changes will be implemented as of January 1, 2024.

~~*Table 5. Anticipated per unit savings reductions due to new code (Gas)*~~

| Gas Measures | Per Unit % Savings Reduction |
|---|---|
| 2023 Fryer | 80% |
| 2023 Convection Oven | 46% |
| 2023 Combination Oven | 92% |
| 2023 Steamer | 91% |

### *Retrofit*

The plan for the C&I Gas Retrofit ~~Three-Year Plan~~Program includes an 11~~%~~ percent increase in Planned savings above 2023 Planned values. The increase in Planned savings can be attributed to a ramping-up of savings related to HVAC and Custom projects. More specifically, the Company has planned a 30~~%~~ percent increase in Custom HVAC Energy Management Systems/Controls in large part due to the ~~Company's~~ increased focus on EMS, particularly those buildings that are too large to participate through the prescriptive EMS Tool pathway. Additionally, the Company has increased a host of Custom HVAC measures, including a 20~~%~~ percent increase in Planned savings from Custom HVAC retrofit equipment.

- The 2024 C&I Gas Retrofit Plan includes an 11% increase in Planned savings above 2023 Planned values. The 2026 Retrofit plan includes a 34~~%~~ percent increase in Planned savings above the 2023 Planned values.
- The 2024 Annual Plan accounts for ~~a nearly~~an approximately 12~~%~~ percent increase in HVAC related savings above the 2023 ~~Planned~~planned values. The 2026 Annual Plan ~~contains~~will contain a 35~~%~~ percent increase in HVAC related savings above 2023 ~~Planned~~planned values.

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- The 2024 Annual Plan accounts for a 20~~%~~ percent increase in Custom savings above the 2023 ~~Planned~~planned values. ~~-~~The 2026 Annual Plan represents a 46~~%~~ percent increase in Custom savings above the 2023 ~~Planned~~planned values.

*New Construction*

The C&I Gas New Construction Three-Year Plan accounts for significant reductions in per unit claimable savings from Food Service Equipment due to Code Standards (~~Please~~ see table above). To account for the decrease in Food Service claimable savings, the Company will look to ramp-up savings associated with HVAC and Custom projects. The 2026 Plan includes a 35~~%~~ percent increase in HVAC related savings above 2024 Planned values. Likewise, the 2026 Plan accounts for a 21~~%~~ percent increase in savings from Custom projects above 2024 Planned values. The Company anticipates these values will be achieved because of the newly streamlined New Construction Program and as a result of process improvements and increased outreach.

- The 2026 C&I Gas New Construction Plan represents a 21~~%~~ percent increase above 2024 Planned values.
- The 2026 Annual Plan accounts for a 54~~%~~ percent increase in HVAC related savings above 2023 Planned values. HVAC related savings increase by 35~~%~~ percent from 2024 Planned values to 2026 Planned values.
- The 2024 Annual Plan represents an 18~~%~~ percent increase in Custom savings above 2023 Planned values, and a 21~~%~~ percent increase custom savings from the 2024 Annual Plan to the 2026 Annual Plan.~~-~~

Please note that the 2024-2026 C&I Gas New Construction Plan takes into account the savings reductions per unit described in the table listed above.

*Small Business Direct Install (Electric and Gas)*

~~On~~For the ~~electric side~~Electric Small Business Direct Install Program, the ~~company~~Company is projecting a steady transition from a lighting dominated base of 2023 (almost 90~~%~~ percent of savings) to about 50~~%~~ percent by 2026. ~~-~~The difference is largely made up in ~~Custom~~custom HVAC, drives/motors, and custom water heaters (heat pump water heaters).

~~On~~ For the ~~gas side~~Gas Small Business Direct Install Program, the ~~company~~Company increased savings for building ~~shell. There is going to~~shells. Over the 2024-2026 term, there will be a continued push ~~over the next 3 years~~ to diversify ~~our~~the Company's measure mix and move away from lighting and ~~bringing~~bring in more HVAC and ~~Weatherization~~weatherization opportunities.

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### 4.1.1 Comparison of Goals with Market Potential Study Refresh

An analysis was performed to compare the MPS Refresh[29], prepared by Dunsky Energy and Climate Advisors for the EERMC, with the 2023 BCR model. The comparison is shown in ~~Table 6.~~

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[29] For additional information on the Market ~~Potential Study refresh~~Refresh, please visit the EERMC ~~websit~~websit~~e~~e.

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*Table 3*~~Table 3~~ below.

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*Table ~~6.~~3. Comparison of Goals with MPS Refresh*

| | Planned Values | | MPS Values | |
|---|---|---|---|---|
| | Lifetime MMBtu (Gas Programs) | Lifetime MWh (Electric Programs) | Lifetime MMBtu (Gas Programs) | Lifetime MWh (Electric Programs) |
| **Residential** | | | | |
| 2024 | 1,097,009 | 194,614 | 3,225,203 | 524,767 |
| 2025 | 1,105,676 | 203,802 | 3,238,316 | 535,582 |
| 2026 | 1,078,396 | 212,525 | 3,248,486 | 541,630 |
| **Income Eligible Residential** | | | | |
| 2024 | 293,446 | 52,348 | 291,786 | 60,900 |
| 2025 | 303,154 | 64,487 | 292,957 | 61,685 |
| 2026 | 304,838 | 70,343 | 293,891 | 62,272 |
| **Commercial and Industrial** | | | | |
| 2024 | 2,031,148 | 489,569 | 3,541,850 | 811,977 |
| 2025 | 2,215,286 | 504,090 | 3,559,417 | 804,343 |
| 2026 | 2,414,017 | 525,060 | 3,577,207 | 810,052 |
| **Total Savings** | 10,842,969 | 2,316,836 | 21,269,114 | 4,213,208 |

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

- **Planned quantities** ~~– the~~. The difference in quantities between the MPS ~~refresh~~Refresh and the Company's goals is largely driven by unconstrained budget increases allowed in the MPS ~~refresh.~~ Refresh. The significantly higher quantities in the MPS ~~refresh~~Refresh caused savings to be significantly higher for many measures.
- **Sourcing and values of impact factors** ~~–~~. The BCR sources were mostly ~~RI~~Rhode Island specific studies, recent ~~MA~~Massachusetts studies, or sourced from recent technical reference manuals (TRMs~~–~~). These updated sources in several cases reflected decreased savings compared to the sources used in the MPS Refresh which included IL 2019 TRM, Iowa 2018 TRM, MA 2019 TRM, Dunsky Professional Judgement, and ~~Energy Star~~ENERGY STAR® sources.



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- **Lifetime savings** ~~–~~. Differences in lifetime savings were driven by differences in impact factors and planned quantities, as well as some measure life differences.
- **Measure included in the MPS Refresh** ~~– there~~. There were a handful of measures providing savings in the MPS ~~refresh~~Refresh that ~~Rhode Island Energy~~the Company does not currently plan for in its programs~~; some~~. Some of these measures ~~had~~ failed the RI ~~test~~Test when ~~Rhode Island Energy~~the Company had previously screened them and some of them are new.

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

## 4.2 Historic Savings

To put the savings goals in context, ~~Table 7~~*Table 4*~~Table 4~~ and ~~Table 8~~*Table 5*~~Table 5~~ show a summary of historic electric and natural gas energy efficiency achievements and spending since 2009.

*Table ~~7.~~4. Summary of 2009-2021 Electric Energy Efficiency Year End Reports*

| Year | Annual MWh Savings | Lifetime MWh Savings | Total Benefits ($000) | Total Spending ($000) | TRC BC Ratio | RI Test BC Ratio | EE Program Charge/ kWh | $ / lifetime kwh | Participants |
|---|---|---|---|---|---|---|---|---|---|
| 2009 | 81,543 | 899,331 | $123,045 | $29,536 | 3.02 | | $0.00320 | $0.027 | 106,525 |
| 2010 | 81,275 | 929,242 | $128,864 | $29,712 | 3.73 | | $0.00320 | $0.027 | 153,611 |
| 2011 | 96,009 | 1,076,778 | $151,542 | $39,308 | 3.35 | | $0.00526 | $0.031 | 254,747 |
| 2012 | 119,666 | 1,288,325 | $140,104 | $50,719 | 2.24 | | $0.00589 | $0.036 | 201,351 |
| 2013 | 159,035 | 1,612,371 | $192,418 | $72,875 | 2.24 | | $0.00862 | $0.039 | 470,245 |
| 2014 | 268,468 | 3,278,088 | $314,673 | $80,321 | 2.69 | | $0.00911 | $0.041 | 551,882 |
| 2015 | 222,822 | 2,287,785 | $312,000 | $82,897 | 2.38 | | $0.00942 | $0.036 | 622,822 |
| 2016 | 214,329 | 2,034,220 | $234,234 | $74,274 | 2.16 | | $0.01077 | $0.034 | 758,284 |
| 2017 | 232,023 | 2,327,916 | $249,986 | $90,012 | 1.91 | | $0.01124 | $0.039 | 687,141 |
| 2018 | 206,209 | 1,848,845 | $369,835 | $88,123 | 1.88 | 2.99 | $0.00972 | $0.048 | 688,471 |

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| 2019 | 190,159 | 1,624,417 | $489,299 | $104,620 | 2.49 | 3.43 | $0.01121 | $0.064 | 668,420 |
| 2020 | 157,346 | 1,299,159 | $533,494 | $88,224 | | 4.76 | $0.01323 | $0.068 | 637,349 |
| 2021 | 131,365 | 1,046,790 | $477,423 | $94,564 | | 3.88 | $0.01113 | $0.090 | 418,432 |
| 2022 | 105,036 | 712,989 | $188,289 | $80,852 | | 1.99 | $0.~~00956~~00960 | $0.113 | 297,957 |
| | | | | | | | | | |

*Table ~~8.~~5. Summary of 2009-2021 Natural Gas Energy Efficiency Year End Reports*

| Year | Annual MMBtu Savings | Lifetime MMBtu Savings | Total Benefits ($000) | Total Spending ($000) | TRC BC Ratio | RI Test BC Ratio | EE Program Charge/Dth | $ per lifetime MMBtu | Participants |
|---|---|---|---|---|---|---|---|---|---|
| 2009 | 195,200 | 2,553,828 | $26,071 | $6,552 | 2.83 | | $0.150 | $2.44 | 8,339 |
| 2010 | 140,097 | 2,155,112 | $26,309 | $5,496 | 2.31 | | $0.150 | $2.33 | 5,670 |
| 2011 | 119,613 | 1,623,922 | $18,196 | $4,868 | 2.21 | | $0.150 | $2.73 | 3,080 |
| 2012 | 229,811 | 3,300,583 | $36,237 | $13,310 | 1.68 | | $0.384 | $3.72 | 11,681 |
| 2013 | 311,585 | 4,377,672 | $44,747 | $19,501 | 1.78 | | $0.414 | $4.21 | 135,646 |
| 2014 | 409,029 | 5,958,381 | $50,417 | $20,034 | 2.41 | | $0.600 (~~Resi~~Res) $0.492 (C&I) | $3.84 | 143,655 |
| 2015 | 419,778 | 5,249,170 | $54,762 | $20,129 | 2.60 | | $0.781 (~~Resi~~Res) $0.637 (C&I) | $3.47 | 146,098 |
| 2016 | 417,820 | 5,282,221 | $51,103 | $23,135 | 1.93 | | $0.748 (~~Resi~~Res) $0.487 (C&I) | $4.78 | 150,160 |
| 2017 | 468,211 | 4,615,034 | $70,972 | $27,513 | 1.86 | | $0.888 (~~Resi~~Res) | $5.96 | 112,202 |

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| | | | | | | | $0.726 (C&I) | | |
| 2018 | 497,119 | 5,513,499 | $113,117 | $27,231 | 2.62 | 3.11 | $0.869 (~~Resi~~Res) $0.671 (C&I) | $4.94 | 101,423 |
| 2019 | 451,466 | 4,527,147 | $115,736 | $30,142 | 2.17 | 2.66 | $0.715 (~~Resi~~Res) $0.420 (C&I) | $6.66 | 151,655 |
| 2020 | 318,845 | 2,960,120 | $96,717 | $24,598 | | 3.08 | $1.011 (~~Resi~~Res) $0.777 (C&I) | $8.31 | 164,410 |
| 2021 | 316,424 | 3,454,006 | $120,325 | $35,680 | | 2.79 | $0.871(~~Resi~~Res) $0.596 (C&I) | $10.33 | 165,233 |
| 2022 | 383,562 | 3,642,284 | $110,274 | $31,393 | | 2.77 | $1.136 (~~Resi~~Res) $0.620 (C&I) | $8.62 | 152,624 |

## 4.3_ Funding Plan and Budgets

Over the 2024-2026 term, the following funding sources may be used each year and the amounts from each source will be detailed in Annual Plans. The ~~electric~~Electric and ~~natural gas energy efficiency programs~~Natural Gas Energy Efficiency Programs are funded by the following sources:

1. A charge on the customer's bill currently labeled "Energy Efficiency Programs" comprised of the existing energy efficiency program charge of $0.~~00956~~0096 per kWh, and $1.136 per Dth for Residential and Income Eligible Customers and $0.~~62~~620 per Dth for Commercial and Industrial customer, plus an annual fully reconciling funding mechanism charge in accordance with RI Gen. Laws § 39-1-27.7.

2. Revenue resulting from the participation of the Company's energy efficiency resources in ISO-New England's Forward Capacity Market (FCM); these are applied toward the electric plans only.

3. Funds from any state, federal, or international climate or cap and trade legislation or regulation including, but not limited to, revenue or allowances allocated to expand ~~Rhode Island~~RI Energy's energy efficiency programs. (Waiting for word on finalizing RGGI funding~~)~~).

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4. Other sources may be identified by the ~~EERMC and the~~ Company with input from other stakeholders such as the EERMC.

The uncertainties associated with these funding sources include company sales, customer co-payments, commitments made for future years, the settlement price for future FCM auctions, identification of additional outside sources of funding, and the Company's success in minimizing costs to maximize customer benefit. Due to these uncertainties, the Company estimates the amount of funding it expects to need in each year of the ~~Three-Year~~2024-2026 Plan and asks for provisional approval of these amounts to guide the development of future Annual Plans.

The Company intends to continue to work with various market actors (e.g., program vendors, distributors, designers, and builders) to obtain the best pricing for services to achieve program savings goals while controlling costs. The Annual Plans, including the attached filing of the 2024 Annual Plan, will reflect progress made in leveraging other sources of funding, if applicable. The Company will also coordinate with OER to leverage, when possible, the incentives made available through ~~the Inflation Reduction Act~~IRA.

# ~~5.~~Section Five: Performance Incentive Plan

**Commented [RIE52]: Adrian Caesar:** This section is sparse. Previous iterations of the 3YP included significantly more detail which is helpful in maintaining a clear historical understanding of the PIM.

**Commented [RIE52R2]:** Updated section 5.1 in June 30th version.

## 5.1 Proposed Performance Incentive

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The ~~Rhode Island Public Utilities Commission~~PUC approved a ~~performance incentive mechanism (~~PIM~~)~~ for the 2021~~–~~-2023 Plan in Docket 5076 that changed the way that the Company measures and earns a performance incentive.[30] The PIM, as approved in Docket 5076, established the measurement of performance as a net benefits framework based on a set of prioritized benefit categories. This prioritizes utility system impacts over resource benefits generated by the programs and omits the societal benefits. The "netting" calculation incents budget controls so that the benefits are achieved in line with the portfolio budgets as proposed in the Plan.

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

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

[30] ~~Refer to Appendix A of PUC Report and Order No. 24225;~~ Refer to Appendix A of PUC Report and Order No. 24225; written order issued on September 21, 2021 for final guidance on the PIM as approved in PUC Docket 5076. ~~http://www.ripuc.ri.gov/eventsactions/docket/5076-NGrid-Ord24225%20(9-21-2021).pdf.~~

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

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

The PIM measures performance at the sector and fuel level:

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

The earning opportunity for each portfolio is allocated to the sectors with positive net benefits. The PIM also includes Service Quality Adjustments (SQAs) for those sectors with planned negative net benefits, as calculated above, which require the Company to achieve defined levels of performance equal to the sum of prioritized total benefits. If the defined levels of service (total benefits) are not achieved in the identified sectors, the SQAs apply reductions to any realized earnings in the sectors with earnings opportunities. The SQAs also include a cost component that adjusts the realized performance, and consequently any reduction of earnings, based on how the realized expenditures in the non-earning sectors compare to planned budgets. The SQAs therefore provide a similar incentive signal as the "netting" calculation in the core of the PIM and provide the Company with signals that savings and benefits should be pursued and prioritized in each sector, rather than exclusively the sector(s) where the earning opportunity resides.

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In addition, the PIM calculations include a set of potential adjustments that are intended to further incent the company to maintain budget controls in the delivery of savings, and therefore prioritized benefits, by adjusting earnings under this mechanism based on cost relative to budget.

The Company is proposing to retain the structure of the ~~Performance Incentive Mechanism (~~PIM~~)~~ adopted by the ~~Commission~~PUC in Order 24225 in Docket 5076 for the ~~Three-Year~~2024-2026 term. This structure is aligned with the PUC's PIM principles and was used by the Company in its 2022 and 2023 Annual Plans. While retaining the structure,

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the Company may propose changes to the inputs in the PIM calculation in the Annual Plans over the three-year ~~Term.~~ term. Furthermore, the Company may revisit the PIM structure in the 2025 or 2026 Annual Plans as program strategy evolves to accommodate regulatory or policy changes.

# ~~6.~~Section Six: Analysis of Total Rhode Island Energy Efficiency

~~To be provided, per the revised LCP standards.~~

~~7.~~The LCP Standards adopted in Docket 23-07-EE specify that the Three-Year Plan contain "an analysis of total energy likely to be saved in Rhode Island through energy efficiency over the three years, and the portion of those total energy savings that are likely to be delivered by the distribution company's energy efficiency programs. For purpose of this analysis, total energy savings should be presented in two different ways: the cumulative annual energy savings to be delivered during the three years, and the cumulative lifetime energy savings to be delivered during the three years. At a minimum, this analysis should include:

(1) An estimate of the total energy likely to be saved and emissions likely to be avoided in Rhode Island through energy efficiency over the three years, for the following fuel types: electricity, natural gas, and delivered fuels.

(2) For each of the fuel types, an estimate of the portion of total energy savings and avoided emissions that are likely to be delivered by the distribution company's energy efficiency programs and the associated budget.

(3) For each of the fuel types, an estimate of the portion of total energy savings and avoided emissions that are likely to be delivered by state and local programs beyond the distribution company's EE programs, and the associated budget.

(4) For each of the fuel types, an analysis of what entities or programs will likely deliver the remaining portion of total energy savings and avoided emissions that will not be delivered by the distribution company's EE programs or other state and local programs.

Table 6~~Table 6~~ shows the results of the savings analysis and Table 7~~Table 7~~ shows the results of the emissions analysis.

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*Table 6. State of Rhode Island, Energy Savings*

| | | Electricity (MWh) | % Savings | Natural Gas (MMBtu) | % Savings | Delivered (Gallons) | % Savings | Total Energy Saved (MMBtu) | % Savings | Total Associated Budget 3YR ($) | % Budget |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | RIE | 277,445 | 68% | 919,057 | 81% | - | 0% | 4,630,543 | 70% | $ 406,716,000 | 78% |
| | Non Programmatic Adoption | 96,537 | 24% | 193,562 | 17% | - | 0% | 1,484,977 | 22% | $ - | 0% |
| | State | 26,851 | 7% | 22,463 | 2% | 58,572 | 100% | 392,875 | 6% | $ 106,237,791 | 20% |
| | Other RI Utilities (Pascoag + Block Island) | 7,045 | 2% | - | 0% | - | 0% | 94,242 | 1% | $ 10,327,344 | 2% |
| | **Total** | **407,879** | **100%** | **1,135,082** | **100%** | **58,572** | **100%** | **6,602,638** | **100%** | **$ 523,281,135** | **100%** |
| Lifetime | RIE | 2,224,608 | 67% | 9,847,421 | 74% | - | 0% | 39,606,801 | 68% | NA | NA |
| | Non Programmatic Adoption | 880,824 | 27% | 3,118,614 | 23% | - | 0% | 14,901,716 | 26% | NA | NA |
| | State | 159,823 | 5% | 390,640 | 3% | 1,049,737 | 100% | 2,729,592 | 5% | NA | NA |
| | Other RI Utilities (Pascoag + Block Island) | 56,500 | 2% | - | 0% | - | 0% | 755,822 | 1% | NA | NA |
| | **Total** | **3,321,756** | **100%** | **13,356,675** | **100%** | **1,049,737** | **100%** | **57,993,931** | **100%** | **NA** | **NA** |

*Table 7. State of Rhode Island, Emission Savings*

| | | Electricity (metric tons CO2) | % Savings | Natural Gas (metric tons CO2) | % Savings | Delivered Fuel (metric tons CO2) | % Savings | Total Avoided Emissions (metric tons CO2) | % Savings |
|---|---|---|---|---|---|---|---|---|---|
| Annual | RIE | 196,709 | 68% | 48,710 | 81% | - | 0% | 245,419 | 70% |
| | Non Programmatic Adoption | 68,445 | 24% | 10,259 | 17% | - | 0% | 78,704 | 22% |
| | State | 19,038 | 7% | 1,191 | 2% | 594 | 100% | 20,822 | 6% |
| | Other RI Utilities (Pascoag + Block Island) | 4,995 | 2% | - | 0% | - | 0% | 4,995 | 1% |
| | **Total** | **289,186** | **100%** | **60,159** | **100%** | **594** | **100%** | **349,940** | **100%** |
| Lifetime | RIE | 1,577,247 | 67% | 521,913 | 74% | - | 0% | 2,099,160 | 68% |
| | Non Programmatic Adoption | 624,504 | 27% | 165,287 | 23% | - | 0% | 789,791 | 26% |
| | State | 113,315 | 5% | 20,704 | 3% | 10,650 | 100% | 144,668 | 5% |
| | Other RI Utilities (Pascoag + Block Island) | 40,059 | 2% | - | 0% | - | 0% | 40,059 | 1% |
| | **Total** | **2,355,125** | **100%** | **707,904** | **100%** | **10,650** | **100%** | **3,073,678** | **100%** |

To perform the analysis, the Company made several assumptions:

- For the Company's 2024-2026 budget estimates, the 2024 Annual Plan budget was assumed for all three years with an inflation rate of 3 percent from year to year.
- Non-Programmatic Adoption estimates used the Company's 2024-2026 Plan free-ridership rates.

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- Unless state savings were called out, the Company utilized savings per dollar values from its 2024-2026 benefit-cost model to convert dollar spend from state programs to state savings.
  - Programs that were integrated in this analysis included the Clean Heat RI Program, HOMES, HEEHRA, RIIB, RGGI, and WAP funding.
- Other RI Energy estimates utilized savings data from the ACEEE 2022 Annual Score Card[31] and converted the savings to budget spend by calculating the ratio of MWh per dollar spent from the Company's 2024-2026 benefit-cost model and applying that ratio to energy saved from other utilities.

[31] American Council for an Energy-Efficient Economy, ACEEE 2022 Annual Scorecard, (Dec. 6, 2022).

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# Section Seven: Conclusion and Requested Rulings

In accordance with the LCP Standards adopted by the PUC in Docket 23-21-EE, the Company requests that the PUC approve the following:

- Initial three-year energy savings goals and strategies for Energy Efficiency and Conservation Procurement programs and portfolio, provided that such goals may be updated annually.
- Initial three-year budget plan for Energy Efficiency and Conservation Procurement programs and portfolio; provided that specific budgets will be proposed, and approval sought through the annual plans.
- The structure of the performance incentive mechanism proposed herein, with specific goals, earning rates, and provided that the specific earning opportunity is determined in subsequent binding annual plans.

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# Attachment 1: Energy Efficiency Funding

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# Attachment 2: Program Level Benefit Cost Summary

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# Attachment 3: Program List by Sector

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# Attachment 4: Definitions

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# Attachment 5: Customer Listening Sessions for 2024-2026 Plan

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**Adrian Caesar:** This is a good step, though would like to see more about *how* the Company will work with the EC4 (beyond participating meetings) to determine what constitutes compliance.

It is important to understand what constitutes compliance between now and when the 2025 Climate Strategy is completed.

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That's correct. As part of our SEMP eligibility criteria, the Company often looks for customers with sustainability or corporate environmental goals (in addition to other attributes that make for a successful partnership).

Through the SEMP partnership, we can help outline strategies to help achieve sustainability/environmental goals and memorialize them in a non-binding MOU. Often times, the customers sustainability or environmental goals serve as a jumping off point to discuss the viability of setting up an MOU and SEMP agreement.

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**Adrian Caesar:** These are bullets about what the Company sees as its role in developing the RI workforce, but falls short of detailing those roles. Would like to see more detail on how the Company goes about working on these activities. We emphasize the need for detailed descriptions of planned workforce development and training activities. Can the Company provide some goals for participation/trainees or metrics tied to WFD efforts?

**Samuel Ross:** Additionally, the first two of these appear to just be roles related to articulating the need rather than addressing it, and the third is clearly just support for existing programs, rather than driving innovation or directly supporting workforce development. These roles do not add up to enough proactivity by the company to actually achieve the stated objective, which is ensuring workforce capacity is adequate to serve all customers.

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**Adrian Caesar:** Current and future. One issue with workforce development is that it takes time. We should be working in this plan to develop the workforce that we need for the next one. We seem to be reactive in this area.

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Good idea. Will add ahead of assessment launch.

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**Steven Chybowski:** Should this be on the agenda for an upcoming TWG meeting?

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From the annual plan: Based on conversations with staff at the International Code Council (ICC), the 2024 IECC is expected to be released in mid-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.

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Adrian Caesar: IECC 2024 will need to be adopted within 90 days of their publication this fall and written into state building codes within a year of that - will planning/implementation assumptions be updated retroactively? Will adjustments be made to reflect that the codes will take time to take effect? This has been done in the past when code/baseline changes were implemented

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Adrian Caesar: Is this informed by the NRNC Baseline Study? Should speak to the specific source for the baseline updates

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Added text around lessons learned. Regarding Air Sealing - it proved to be the most expensive measure due to the cost of the equipment and spray foam is very expensive in comparison to other weatherization measures.

**Page 47: [93] Commented [RIE41] Rhode Island Energy 9/8/2023 3:38:00 PM**

Adrian Caesar: Applies to the bullet above as well, but what lessons learned come from the first 1-2 years when these commercial Wx offerings have really been out in the market? RGGI funds supported many SBS projects in late 2021/2022, though air sealing proved to be the most expensive measure. Would like to see some commentary on this.

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We are working on a custom express tool for RI similar to that of MA for 2024.

**Page 47: [95] Commented [AC42] Adrian Caesar 6/29/2023 9:49:00 AM**

MA has been using "Custom Express" tools to capture more site specific details and in many cases greater savings than a deemed savings Rx approach. How will RI calculate the savings for these additional Wx offerings?

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Further detail on multilingual marketing and program materials will be called out in the annual plans. Spanish and Portuguese are the two widely most spoken languages besides English in RI. We intend to translate both marketing and program materials to these languages.

**Page 48: [98] Commented [AC44] Adrian Caesar 6/13/2023 10:11:00 AM**

Good! Would appreciate more details on this - what languages are included, who is leading the effort to effectively translate materials, how will the Company deploy the materials to specific neighborhoods with higher populations of non-English-speaking customers?

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Multiyear strategies are specifically tied to the budget requirements that span several years. What the comment suggests are within the framework of normal annual program plans.

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**Adrian Caesar:** Recommend the following areas be included here: stand up pre-weatherization barriers program, increased focus on EJ40/disadvantaged communities for increasing participation in programs by x%, new multifamily building approach developed and rolled out, IRA program stacking and integration, increasing electrification focus, heat pump market transformation, transition away from gas and other fossil fuels.

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**Steven Chybowski:** I appreciate the expansion of this section in this draft of the report

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**Steve Chybowski:** Understood – the MPS is illustrative of what's available in the marketplace with minimal constraints on EE programming

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