

MEMO

CONSULTANT TEAM

TO: Energy Efficiency Council
FROM: EEC Consultant Team
CC: Office of Energy Resources
DATE: June 20, 2024
RE: Summary of C-Team Comments on 2025 Annual Plan Narrative First Draft



INTRODUCTION

The Rhode Island Energy Efficiency (EEC or “the Council”) Consultant Team (“C-Team”) provides the following comments on Rhode Island Energy’s (RIE or “the Company”) 2025 Annual Plan First Draft Narrative (“the 2025 Plan”). Our review and comments here are primarily focused on the Company’s strategic philosophy and principles of program design, in addition to sector-specific and cross-cutting tactics for delivering program benefits to Rhode Island customers.

SUMMARY OF EEC CONSULTANT TEAM COMMENTS ON 2025 PLAN NARRATIVE FIRST DRAFT

COMMERCIAL & INDUSTRIAL PROGRAM

- Glad to see the Company describe efforts to improve equity for small businesses. Responses to Plan Outline Memo comments suggest that the Company will coordinate with OER’s Equity Justice Manager and hire a contractor to support C&I marketing, both of such efforts involving engagement with nonprofits and community-based organizations.
- Community Solutions model, in which municipalities are linked to a technical assistant to prioritize efficiency improvements in municipal buildings, represents an opportunity to decarbonize schools in environmental-justice communities. The Plan should describe existing school-improvement projects and target schools in EJs, even though it mentions collaboration with OER on the Public School Energy Equity Program.
- An EE Consumer Advocate will be embedded within community-based organizations to provide training to each organization’s team about the intersection of energy with health and safety. The organizations can then support their communities in identifying ways in which energy efficiency can help and how to access opportunities. The Plan should detail how this position will support engagement with small commercial customers in underserved communities.
- To deliver an equity-driven approach to C&I programs, the Company will hire multilingual small business auditors, conduct participant surveys in multiple languages, promote equitable hiring practices through vendor agreements, and focus on reaching small C&I customers with a specific focus on woman and minority-owned enterprises. To understand the effectiveness of these efforts, the Company should provide regular updates in EWG meetings and quarterly reports.
- Recommend that the Company explore natural refrigerants and other low global-warming potential refrigerants, as there are some artificial refrigerants that can meet or exceed EPA requirements.

- The Grocer Initiative calls for refrigerant leak surveys when they are visible to the naked eye, but these leaks can severely offset the GHG reductions from EE. We suggest that the Company consider additional opportunities to mitigate refrigerant leaks (from refrigeration or HVAC equipment) and monitor the National Grid MA DPU Docket 23-154, related to refrigerant leak mitigation.
- Continued expansion of savings from non-lighting measures/strategies may be at risk due to bottlenecks in workforce capacity. For example, qualified service providers for the Building Analytics program require a very unique skillset (blend of engineering, commissioning, and energy management skills). Limited pool of skilled workers will limit savings to some degree.
- In determining the target communities for Main Street efforts, the Company should use a similar map included in the latest Small Business Process Evaluation. This map illustrated participation rates (by small businesses) in each zip code.
- There isn't any mention of the efforts to identify and displace electric-resistance heating in the C&I sector in this section. Is that not an anticipated strategy for 2025? If not, then it definitely should be. Our understanding was that the Company has done some initial billing analysis to identify electric-resistance-heating customers.
- Is the Company a utility or an ESCO? The Company is effectively an ESCO given the suite of services it offers, but it should consider how to integrate offerings beyond its scope to fully serve customers where possible.
- The Plan should discuss on the RI Mercury Ban that will prohibit the sale of pin-base CFLs and Fluorescent lighting starting in 2025
 - If linear florescent lighting is going to be a substantial component of the C&I programs, a discussion about dual baselines and planned phase out would be helpful to see.
- Great to see the inclusion of a Trade Ally Engagement Specialist.
- Whole building P4P programs are mentioned in the EMV plan, but aren't included in the 2025 program plan. Is the company planning to offer such programs in the near future?

CROSS-CUTTING

- The Company said that it would discuss implementing ways to simplify program participation, such as expanding midstream measures, simplifying participation forms, and promoting/expanding direct-to-contractor payments with the Equity Working Group (EWG).
- In response to comments on the 2025 Plan Outline Memo, the Company indicated that its website will be revamped this year. The Plan includes details about how the website will be revamped to improve the user experience.
- When navigating to the RI Energy Website, converting to gas is listed under Ways to Save. While this is true of converting customers from delivered fuels to gas, some of the language on the page contradicts statewide climate policy. For instance, the phrase "It's clean" is used to characterize gas. While it is cleaner than other fossil fuels, it is certainly not a clean energy source.
- The strategic plan to reach and serve multifamily customers by working with multifamily property owners/managers should include energy-aligned lease language dissemination.

- Workforce Development section includes some good details about how the Company will fill gaps identified in the Workforce Needs Assessment, both in workforce capacity and in specific skillsets/trades.
 - Language on building a workforce pipeline and upskilling does not mention increasing workforce diversity, which has been identified as an opportunity to help reach underserved communities.
- Plan notes that incentives provided through different funding sources, such as the Inflation Reduction Act-funded/OER-administered programs, will require separate applications. Is there any way to allow for data sharing such that customers need only complete one application in order to qualify for the full suite of potential incentives?
- The Company will develop a public-facing data dashboard to summarize key program metrics updated monthly. This data dashboard will be developed with stakeholder input in 2024 and launched at the beginning of 2025 with continuous improvement planned through the 2025 program year.
- Throughout 2025, the Company will identify activities which may help lay the groundwork for implementing program enhancements which AMF will enable in future years. AMF will significantly enhance program capabilities.

EVALUATION, MEASUREMENT, AND VERIFICATION (EM&V)

- Initial Recommendations for 2025 Evaluation Studies (in addition to annual studies such as Custom Impact Evaluations)
 - Existing Building Commissioning Process Evaluation
 - Monitoring-Based Commissioning Process Evaluation – quick evaluation focused on customer feedback to get initial input on how to improve the MBCx offering.
 - Residential Appliance Saturation Study (RASS)
 - Heat-Pump Savings Evaluation
 - Residential & Income-Eligible QA/QC Process Evaluation
 - Talk with program managers to discuss data tracking and reporting QA/QC, then compare to best practice. Depending on the state, there is little transparency into how QA/QC works. What does RIE do when contractors are not performing up to par? Are there procedures to remediate performance or remove contractors? General lack of transparency here in RI – this applies to all sectors.
 - EnergyWise and Income-Eligible Multifamily Impact Evaluation (Prescriptive-focus)
 - Updates to 2021 Net-to-Gross Studies
 - Updates to RI Electric Load Shapes (using updated MA Data)
- We don't see the sampling criteria specified for the studies in the plan. Should be a census if participation is low. Understand that this is the initial draft, but commenting for future submissions
- How will deemed savings assumptions be updated or marked for update?
- What type of metering will be performed for Custom Gas Impact Evaluation? It appears that the same text was copied from the Custom Electric Impact Evaluation.

- Is metering included in the Lighting Controls Impact Evaluation?
- The C&I market research study focusing on how much existing lighting does not have automated controls seems like a good idea.