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### Input on 2027-2029 Energy Efficiency Plan Outline Memo

To the Energy Efficiency Team at Rhode Island Energy:

I write on behalf of my organization, Acadia Center, with early comments regarding the high-level strategy and themes that Rhode Island Energy (the Company) has outlined for the coming 2027-2029 Energy Efficiency Plan, the “Plan”. Acadia Center supports the procedural shift to a three-year binding plan and looks forward to an enhanced focus on implementation and evaluation of impact.

### **Continued Commitment to Access and Equity**

Thank you for your continued transparency and ongoing engagement with stakeholders during the planning process. Acadia Center aligns with the equity vision outlined in the Plan, which centers on reducing barriers and the consistent measurement of equity-related outcomes. As has been highlighted in past years, energy efficiency (EE) programs must appropriately budget for the compensation of and thus more complete partnership with community-based organizations.

### **In Defense of Energy Efficiency (EE)**

As EE program administrator, Rhode Island Energy must play a central role in communicating the value and benefits of these programs to all customers, regulators, and policymakers. The continued emphasis on affordability and cost-effectiveness presents an opportunity to highlight these inherent traits of energy efficiency, including the concept of least cost procurement and building awareness of the established cost-effectiveness screening. The Governor’s proposal to arbitrarily cap EE funding would have a material, negative impact on EE programs in Rhode Island and their numerous benefits.

### **Policy Direction**

While highlighting the 2027-2029 EE planning priorities, the Company notes an *uncertain policy direction or dynamic policy environment*. Acadia Center expresses concern for this messaging, which appears to mitigate expectations and provide cover for scaling back programs, regardless of cost-effectiveness and ratepayer benefits. Rhode Island’s policy environment on energy efficiency is clear: as per G.L. § 39-1-27.7. (Least Cost Procurement), **utilities are required to prioritize all cost-effective energy efficiency that is cheaper than the cost of supply**. Energy efficiency also serves as the foundation of climate action, as outlined in the 2025 Climate Strategy, with such action mandated by G.L. 42-6.2-2. (Act on Climate).

*Building energy efficiency is a longstanding pillar of decarbonization, as it can mitigate energy consumption, reduce utility bills, and manage peak electricity demand and system costs.*

**Additional Note & Question**

As has been noted in past comments, Acadia Center urges the Company to consider a more prompt pilot and roll out of AMI functionalities and tools which may offer customers a tangible financial benefit. The lack of planning on time varying rates, for example, further delays the return on investment that customers should expect to yield.

The Plan notes that the residential and income eligible programs simply need refinement, while the commercial and industrial program intends to increase uptake of measures identified through its opportunities study and expand vendor delivery channels. To what extent is this increase simply making up the reductions in C&I included in the 2026 Plan?

Thank you for your consideration. We look forward to continuing to work with your team on the 2027-2029 Energy Efficiency Plan.

Sincerely,

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