

Highlights

- Incorporation of both base case and high case clearly responsive to stakeholder, C-Team feedback re: ambition of goals, desire to see multiple numbers from NGrid rather than just a single proposal.
- Responsive to some other elements of C-Team feedback as well
- High scenarios have strong BCRs, acquisition costs (similar to or better than base case in both!)

Critiques

- Budget constraint language not modified appropriately in all places. Even referred to in direct context of near-term rate and bill impacts on p. 83 in a generalized context
- MPS cost description not modified appropriately in all places. Several points of feedback from C-Team feedback on savings justification ignored.
- Continued heavy caveats around 'robust economic recovery'
- Heavy reliance on CHP savings to push up combined achievement in 2022 and 2023
- P. 16 – Comment indicating the EERMC will only get 1 week to review draft annual plans in 22 and 23!
- Several references to savings opportunities post lighting as having 'lower savings' which is not true, and implying that this means that future incentive budgets are 'constrained' (which doesn't make sense, b/c as long as programs are cost-effective, programs with a 100% incentive are also cost-effective (since incentives are just a transfer)).
- There's a duplicate paragraph at the end of p 26
- P. 35-36 – Really did not like financing text across transition from p.35-36, which implies no opportunities for further C&I financing in RI
- P.36 – indicates the company does not have a vendor for the telecom initiative, but 'hopes to find one'
- No reference to carbon-equivalent emissions calculations despite verbal commitment to include this.

Other Comments

- P. 59 – Text I did not understand/was not aware of re: interaction btwn Grid Mod, AMF, and EE, seeming to indicate EE getting displaced in large part in terms of potential savings.
- P.67 – The prudence considerations are listed out in more detail than I think we've seen elsewhere. Are these new? They seem to be based on, but not directly drawn from, updated standards