



Toby Ast

July 10th, 2026

Customer Programs Manager, Rhode Island Energy
280 Melrose Street, Providence RI
02907

RE: Green Energy Consumers Alliance comments on Draft 1 of RIE's 2027-2029 3-Year Energy Efficiency Plan

Dear Mr. Ast,

Green Energy Consumers Alliance is a non-profit organization with a mission to speed a just transition to a zero-carbon future. We are a member of Rhode Island Energy's (RIE) energy efficiency technical working group and are writing in to provide comments on the first draft of RIE's binding 2027-2029 3-Year plan.

Alignment of program budgets with state climate planning and request for increased clarity with budget increases

Simple math suggests that gas consumption in Rhode Island must fall at the rate of about 4 percent per year to reach net zero because we have about 23 years to reach net zero emissions in 2050. The budget does not come close to reducing NET reductions (savings from the program adjusted for any incremental growth to the gas system). While the Rhode Island 2025 Climate Action Strategy emphasizes energy efficiency as a strategy to help the state meet the mandates under the Act on Climate¹, program designs that incentivize the installation of new fossil fuel appliances, even ones with improved efficiency over current appliances, are not a true path towards emissions reductions. Program design should be concentrated on truly foundational measures like weatherization, and then electrification of end use devices. Program measures that incentivize new fossil fuel appliances across all customer types should be eliminated, to concentrate the budgets on foundational and electrification-based programs.

The first draft projects a budget of approximately \$58.7M for the electric portfolio and \$36.4M for the gas portfolio, which is a change of about -\$3.9M and +\$3.4M from the approved 2026 program budgets for the electric and gas portfolios, respectively. While achieving greater spending efficiency at lower cost can be beneficial, the total budgets and

¹Rhode Island 2025 Climate Action Strategy, p. 101



the programs they enable must be weighed against their contribution to the emissions reductions mandates required under the Act on Climate.

Given the increase in the gas program budget for the 2027 program year compared to this current program year, we would like to see a clearer breakdown of what program implementation costs are being increased, whether that is attributed to specific measures like increased incentives for weatherization, or by implementation cost, like increased marketing or outreach.

It is also important to highlight that the window heat pump program has not been included in this plan given that Rhode Island Energy is still exploring the feasibility of this program offering and the projected costs, benefits, and greenhouse gas reductions from the addition of this measure may change. We strongly recommend that window heat pumps are added as a program measure but reserve the right to comment on any program design in a future plan draft. At a minimum, there should be funds set aside for a window heat pump program while RIE and stakeholders develop the details for such a program.

Air Source Heat Pump and Heat Pump Water Heater Installation Targets and Metrics

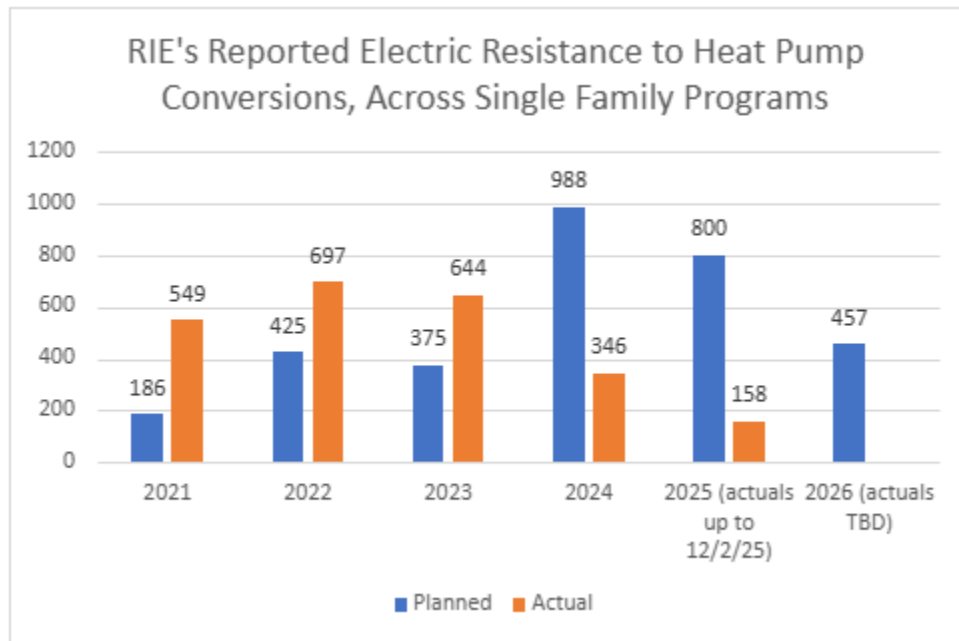
Green Energy Consumers Alliance is strongly supportive of efforts to expand air source heat pump (ASHP) and heat pump water heater (HPWH) installations, particularly in homes currently heated by electric resistance heat (ERH). However, Rhode Island Energy has consistently underperformed when evaluating prior program targets and actual installations. While the company is expanding the definition of electric resistance homes to include homes heated with electric appliances, like space heaters, the issue of the company struggling to identify ERH homes remains.

One area that warrants considerable improvement is with the company's ERH to ASHP conversions. In 2022, as part of the report and order for the 2023 Energy Efficiency Plan, the Public Utilities Commission (PUC) directed Rhode Island Energy to develop a plan for converting 750 ERH customers to ASHPs annually, by 2026.² Though the company had been close to reaching that target in the 2022 and 2023 program years, conversions significantly declined starting in 2024. The graph below was created to compare the company's planned conversions with their actual achievement, focusing on single family programs for which

² [Rhode Island Public Utilities Commission Report and Order, Docket No. 22-33-EE](#), p. 25.



data was most available. Over time, the company's planned and actual conversions have declined, which is out of touch with the PUC's order in Docket No. 22-33-EE.



Graph created by Green Energy Consumers Alliance with data from Docket No: 25-37-EE, RIE's response to the PUC's record request dated 12/19/2025, 2021 Annual EE Plan, and 2022 Annual EE Plan.

While data for ERH to ASHP conversions for the 2026 program year to date is not yet available, the company's planned conversion target is significantly below the target set by the PUC in 2022. Though Rhode Island Energy is expanding the definition of electric resistance heating to include heating by electric appliances (e.g. space heaters), we would like the 2027-2029 Energy Efficiency Plan to further detail the barriers Rhode Island Energy has faced with conversions, an explanation of why they are not planning to meet the target set by the PUC, and how the ERH to ASHP program will be improved so that actual conversions increase. Given that electric resistance heat and/or heating with space heaters is the costliest form of space heating, a more robust framework to identify ERH customers and enable their adoption of ASHPs is essential. If pursuing energy efficiency and energy affordability is a true pillar of this 3-Year efficiency plan, facilitating the adoption of HPs by ERH customers, particularly low- and moderate-income customers, should be a distinct priority.



Additionally, this first draft of the 2027-2029 plan does not include actual figures of planned ERH to ASHP conversions, just a placeholder text³, so we reserve the right to comment on the Company's targets in a future plan draft. Additionally, in a future plan draft, we would appreciate a clearer breakdown of the greenhouse gas (GHG) reductions by program. Given that the figure for the planned installs for ASHP were not included in this draft, it's unclear how that program will impact overall GHG reductions.

Even without a figure for planned ERH to ASHP conversions, Rhode Island Energy does say that their target will represent an increase over the prior year's actuals, for the income-eligible program. While increasing installations over the prior year's actuals is an important goal, the income eligible single-family program completed saw 21 installations compared to the target of 190. Therefore, we expect Rhode Island Energy to improve its program targeting and outreach to better meet initial targets, rather than reduce targets to more easily reach them during the program year.

Regarding the potential inclusion of window heat pump units in the 2027-2029 Energy Efficiency Plan, we strongly support the company developing this as a program. We would like to see the company target window heat pump installations in dwellings where traditional heat pumps are cost prohibitive or structurally infeasible, or in tenant occupied units where the resident may not be able to install traditional heat pumps. Additionally, a carve out of 25% of installations being installed in low- and moderate-income residences should be a program requirement, like the target for ERH to ASHP conversions.

One area we would like to see further development in is how Rhode Island Energy plans to refine its heat pump deployment strategies. While the company has said that "right sizing" heat pump targets is the course of action they plan to take, to have higher achievement of planned measure installments, a "right sizing" measure that reduces overall planned measure installations is in contradiction to the targets set by the Public Utilities Commission, takes the state further away from meeting the Act on Climate, and does a disservice to residents who currently use expensive and inefficient electric resistant or electric appliance heating. If advanced metering infrastructure can be utilized to help Rhode Island Energy determine ERH or electric appliance heated homes, we would like to see more detail about that in this program draft.

Phasing Out Incentives for New Fossil Fuel Appliances

³ Rhode Island Energy 01-3YP Attachment 1 Residential Programs_Draft June 2026, p. 15.



Green Energy Consumers Alliance strongly supports the elimination of incentives for new fossil fuel appliances, which is focused on the Residential New Construction (RNC) pathway for residential programs. Given the need to rapidly decarbonize buildings to meet the Act on Climate, it is crucial to ensure that new construction is built all electric. Therefore, we advocate for the *immediate* elimination of incentives for new fossil fuel appliances in all programs for the start of the 2027-2029 Energy Efficiency Plan. Rather than a phased approach throughout this upcoming three-year cycle, incentives for fossil fuel appliances should end at the conclusion of the 2026 Energy Efficiency Plan.

Important to note are the continued incentives for new fossil fuel equipment that remain in the new construction pathway for Commercial & Industrial customers. Given the need to decarbonize all buildings, not just residential new construction, incentives for new fossil fuel appliances should be eliminated in the C&I pathway as well. We recommend that Rhode Island Energy develop an incentive structure that eliminates these incentives for C&I new construction where electric alternatives are technologically feasible and add a window heat pump program for new construction projects where traditional heat pumps are structurally or financially infeasible.

Advanced Metering Infrastructure as an Energy Efficiency Tool

The Main Text Outline includes a section on Advanced Metering Infrastructure (AMI) and its relevance as an energy efficiency tool. A draft workstream is included which details potential AMI uses in each year of the triennial plan, and in 2027 the company projects using AMI to “develop internal analytics to support exploratory pilots”⁴. Green Energy Consumers Alliance would like to better understand what those “exploratory pilots” might look like and how it will enhance current energy efficiency program offerings. If those pilots could be elaborated on in a future draft of the 2027-2029 plan, that would be appreciated.

Alignment with the Act on Climate and Future of Gas docket

Though the Future of Gas docket is a separate proceeding from the Energy Efficiency Plan, Green Energy Consumers Alliance would like to highlight the disservice that a lack of final policy plan does to the development of the first binding 3-Year Energy Efficiency Plan. The Future of Gas docket is intended to provide guidance on how the regulated gas distribution business must wind down to facilitate meeting the Act on Climate. While this docket has

⁴ Rhode Island Energy 00-3YP Main Text_Draft June 2026, p. 29



been open for over four years, a final policy report has not been issued. Though Rhode Island Energy can take more initiative in developing energy efficiency programs that incentivize electrification, efficiency, and weatherization while disincentivizing new fossil fuel equipment, a Future of Gas policy report would put a stronger framework around these plans, ensuring that there is a managed transition away from the gas system to which Rhode Island Energy can be held accountable. Green Energy Consumers Alliance urges the Public Utilities Commission to release the Future of Gas policy report so that all stakeholders are aware of how the gas distribution business must wind down to meet the Act on Climate.

Green Energy Consumers Alliance appreciates the opportunity to comment on the first draft of the binding 2027-2029 Energy Efficiency Plan and looks forward to reviewing the second draft.

Sincerely,

Tina Munter, Rhode Island Policy Coordinator

Green Energy Consumers Alliance

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