

MEMO

CONSULTANT TEAM



TO: Rhode Island Energy
FROM: EEC Consultant Team
CC: Energy Efficiency Council and Office of Energy Resources
DATE: September 10, 2026
RE: Comments on Second Draft of the 2027-2029 Three-Year Energy Efficiency Plan

I. INTRODUCTION

This memo provides our assessment of responsiveness to comments provided by the Consultant Team (C-Team) on the first draft of the 2027-2029 Three-Year Energy Efficiency Plan (the Plan). While we have reviewed quantitative elements of the Plan and provided feedback on those to the Company, the majority of this document reflects our review of the narrative components of the Plan. Our review categorizes our assessment of responsiveness into one of four categories as indicated in the table below.

Responsiveness	Definition of Responsiveness Level
No response to recommendation	Concern or comment still exists and recommendation is reiterated as part of 2 nd draft comments
Response provided but does not address recommendation	Concern or comment still exists, but Company provided some level of response or edit to indicate its position on the matter and that no further changes should be expected
Response partially addresses recommendation	Text was added to the Plan that demonstrates responsiveness to the concern or comment, though there still exists room for improvement
Response largely addresses recommendation	Text was added to the Plan that demonstrates responsiveness to the concern or comment to a satisfactory level

This memo is organized to mirror the structure of the plan, with comments grouped by major sections:

- **Main Text:** Including plan summary, planning strategies, equity, workforce development, and outreach.
- **Residential Programs:** Covering cross-cutting issues, market rate and income eligible single- and multi-family programs, HVAC, efficiency products, and new construction.
- **Commercial & Industrial Programs:** Addresses program organization, custom pathways, lighting strategies, and sector-specific equity considerations.
- **Other Areas of Focus:** Evaluation, Measurement, and Verification (EM&V); Demonstrations, Pilots, and Assessments (DPAs); Data-specific Review.

For each section we highlight our concerns and include ***specific recommendations*** aimed at improving both clarity of the program design as well as strategies that may lead to more effective program implementation. We look forward to continued collaboration with the Company and other stakeholders

engaged in the Plan development process to ensure that it delivers meaningful benefits to all Rhode Islanders.

II. MAIN TEXT

PLAN SUMMARY

Benefits

The PUC’s proposed edits to the LCP Standards state: “When comparing planned performance to actual performance, the distribution company shall use the most up-to-date avoided cost estimates”. This suggests that the 2027-2029 Plan would have binding goals set using the 2024 AESC Study, against which actual results using the 2027 AESC Study would be compared.

Recommendation	Responsiveness
Add language to the Plan clarifying that dated avoided costs data used in planning will be used as the comparison point against actual performance which will use updated avoided costs.	No response to recommendation
Consider options to reconcile the difference in avoided cost assumptions used for planned goals and actual performance assessment: • Option 1: RIE files adjusted Plan goals which reflect the latest AESC values once available • Option 2: Lock the assumptions used to value actual benefits during the Plan period (i.e., prospectively apply current assumptions to both the Plan and actual performance) • Option 3: Align the three-year planning cycle with the AESC Study development cycle to ensure both the Plan and actual performance have impacts quantified using the latest avoided cost data	No response to recommendation

Economic Benefits & RI Test

The PUC’s proposed edits to the LCP Standards allow for the inclusion of economic development benefits that are incremental to other benefits in the primary view of the RI Test. The Plan states that RIE will not quantify these incremental benefits in the Plan but does not explain the rationale behind this decision, whether that be methodological concerns or time constraints for this three-year plan. We

continue to recommend that it would be in the better spirit of the RI Test to include a non-zero amount of economic development benefits in the primary cost-effectiveness test that is sufficiently conservative and defensible to avoid issues of double-counting.

Recommendation	Responsiveness
Reopen dialogue with relevant stakeholders previously involved in the decision to find a commonly accepted method of including some non-zero amount of economic development benefits in the RI Test. Then, work to quantify these benefits in the Plan.	No response to recommendation

Cross-Functional Coordination

The Plan states that RIE coordinated with internal policy and system planning resources to ensure the Plan's energy efficiency programs support operational effectiveness and further statewide decarbonization goals. The business case for advanced metering infrastructure (AMI) also says that it will provide interval energy usage information required to support time-varying rates and customer load management programs that can be used to shift energy consumption between time periods to reduce energy costs and/or alleviate location-specific constraints on the delivery system.

Recommendation	Responsiveness
Add detail to the narrative describing how RIE is going to use AMI to educate customers about fluctuations in electricity rates and how to reduce costs.	Response largely addresses recommendation

RIE Plan Priority 1: Deliver Cost-Effective, Valuable Investment

The Plan prioritizes cost-effectiveness as the central lens for program design and emphasizes that the transition to a binding three-year plan will require balancing near-term performance with longer-term investments that will produce savings over time.

Recommendation	Responsiveness
Clarify which lens of cost-effectiveness is being applied to planning, as there are several versions of cost-effectiveness testing, each including a different subset of impacts.	No response to recommendation

RIE Plan Priority 2: Leverage Data-Driven Targeting and Insight

The Plan recognizes the need to thoughtfully develop and deploy new data sources, such as AMI, to identify customer segments across all sectors with high savings potential and/or historically lower participation.

Recommendation	Responsiveness
Flesh out a more detailed roadmap of how these tools will be launched, with specifics around relevant data sources, development timelines, strategies to scale deployment, and anticipated benefits for the market.	No response to recommendation

RIE Plan Priority 3: Enhanced Equitable Participation and Measurable Outcomes

This priority directly aligns with the Council’s emphasis on measuring and delivering meaningful program outcomes, with a particular focus on equity. The Plan notes a shift from activity based equity efforts toward strategies that are measurable, outcome-focused, and embedded across program design and delivery without providing clear details relevant to each program.

Recommendation	Responsiveness
Incorporate clear descriptions of current equity efforts and metrics, proposed outcome-focused strategies, desired outcomes, and measures of success that will be used to assess the degree to which outcomes support equity.	Response partially addresses recommendation. Equity metrics have not been connected to implementation strategies and intended outcomes

RIE Plan Priority 4: Improve the Customer Experience

The Plan prioritizes simplifying the customer journey, reducing friction, and improving clarity and coordination across programs, while maintaining sufficient flexibility to meet diverse customer needs. These statements are not connected to specific tactics or direct customer input communicated in forums such as RIE’s recent customer listening sessions.

Recommendation	Responsiveness
List recurring issues that customers face and connect them to specific mechanisms that will improve the customer experience within each pathway.	Response largely addresses recommendation

Detailed Timeline and Implementation Plans

Throughout the Plan, there are references to shifting strategies, evolving measure mixes, and other programmatic changes without timeframes and specific commitments. New initiatives and program changes need specificity and time commitments, even if simply target dates for specific milestones. Additionally, significant quantitative changes over the three-year term (e.g., measure quantities, spending, savings) require explanations on how they connect to strategic changes in the narrative.

Recommendation	Responsiveness
Provide specific timelines and milestones tied to programmatic changes described in the narrative.	Response provided but does not address recommendation
Connect quantitative changes in the Plan numbers to programmatic changes over the three-year term.	Response partially addresses recommendation Plan does not include consistent level of narrative detail to coincide with quantitative changes. Example: The C&I attachment provides some details about how QSPs will promote non-lighting measures, but the Residential attachment fails to speak to notable changes/trends in heat pump adoption.

EQUITY

Equity Metrics

Data and measurement are characterized as foundational to the Plan's approach to equity. RIE states that it will continue to refine equity-related metrics, but the timing of the Equity Working Group (EWG) planning cycle does not align with three-year plan development.

Recommendation	Responsiveness
Coordinate Plan development with the EWG such that the EWG can develop its full report, including recommendations and metrics, with sufficient time for stakeholder review and inclusion in the Plan.	Response largely addresses recommendation
Where appropriate, report more equity metrics as a rate instead of raw numbers to provide greater numerical context and facilitate tracking changes over time.	No response to recommendation
In addition to the number of audits that identify pre-weatherization barriers, track and report the number and cost of barrier-remediation upgrades.	No response to recommendation

WORKFORCE DEVELOPMENT

A robust clean energy workforce is instrumental in achieving goals within RIE's programs, in addition to statewide climate and affordability goals. The rapidly evolving energy sector necessitates thoughtful efforts to train, retain, and upskill the workforce. RIE and other partner organizations have administered several workforce development efforts over the years, but language in the Plan largely describes the continuation of these efforts in 2026 rather than detailing lessons learned from past efforts, plans for the upcoming 2027-2029 plan term, and mechanisms to assess workforce needs.

Recommendation	Responsiveness
Update Plan language from the 2026 Plan to reflect progress, lessons learned, strategies to address unsuccessful approaches, and plans for each year in 2027-2029.	No response to recommendation
Include workforce development metrics alongside planned activities and clarify what metrics are being used to measure success (e.g. growth in the number of contractors, training participants, number of certifications resulting from workforce development funding etc.).	No response to recommendation
Report on how much of the workforce training budget was spent in prior plan years, and whether it was sufficient to accomplish the goals of the training activities planned.	No response to recommendation
Describe the methodology for claiming savings from code support activities.	No response to recommendation

COORDINATION WITH OTHER ENERGY POLICIES AND PROGRAMS

Advanced Metering Infrastructure (AMI) and Grid Modernization

For 2027-2029, the Council prioritized the integration of other energy policies and programs including AMI, active demand management (ADM or ConnectedSolutions, the Company's core ADM initiative), and System Reliability Procurement (SRP) with energy efficiency, but the Plan does not provide enough specificity on this integration. While we acknowledge the misalignment in development of the EE three-year plan and SRP/ConnectedSolutions investment proposals, as the Company is publishing these materials at the end of July, the Plan would benefit from further description of all these parallel efforts.

Recommendation	Responsiveness
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Add text to the Plan, with program-level details, explaining how SRP, active demand management, and other grid modernization efforts will integrate into energy efficiency.	Response partially addresses recommendation Main Text added brief paragraph on coordinated marketing between EE and DR, but no plan for targeting EE to grid-constrained areas in support of SRP.
Explain how AMI will enable targeted energy efficiency and demand reduction to provide load relief to constrained areas of the grid.	No response to recommendation
Present a more detailed roadmap of how AMI deployment, which is already nearing completion in RIE's service territory, will evolve into institutionalized application of AMI-enabled practices. This should include descriptions of timelines, data applications, anticipated procurements or third-party services to develop AMI-supported offerings/tools, and integration into different energy efficiency programs/pathways.	Response partially addresses recommendation Details on use cases/applications added to Main Text, but specific details and timelines are particularly lacking for 2028 and 2029.

Climate Policy Integration and Decarbonization Strategy

Integrating climate policy into the energy efficiency plan is essential for aligning utility actions with Rhode Island's binding emissions reductions targets under the Act on Climate. As the State moves toward a decarbonized energy system, the Company's role in supporting emissions reductions, affordability, and system reliability become increasingly important. While existing legislation/regulations do not mandate that demand-side management programs achieve specified GHG emissions reductions, the Plan should begin to contemplate the longer-term implications of mandatory emissions goals that are unachievable under the current program framework.

Recommendation	Responsiveness
Continue to track and report GHG emissions using carbon accounting methodology that aligns with the RI Climate Action Strategy.	No response to recommendation
Consider all energy bills (not just electric and gas) when discussing affordability and bill impacts.	Response largely addresses recommendation

III. RESIDENTIAL PROGRAMS

CROSS-CUTTING

Multifamily Opportunities Study

Findings from the Multifamily Opportunities Study, a research exercise intended to identify energy-saving measures and incorporate them into the plan narrative and numbers, are expected to change the MF programs significantly in the final version of the plan.

Recommendation	Responsiveness
Share results of the MF Opportunities Study as soon as complete to allow for review prior to integration into the final draft Plan.	Response partially addresses recommendation Residential Sector Team (C-Team, RIE, OER, DPUC) discussed preliminary results but measures not fully integrated into Second Draft Plan.

Customer Listening Sessions

The main text states that input from the listening sessions informed the planning process by reinforcing the need for program designs and delivery strategies that are accessible, customer-centered, and responsive to different customer circumstances. These themes helped inform Rhode Island Energy's approach to customer engagement, equity, workforce and contractor coordination, and program implementation for the 2027–2029 Plan. This is great to see, but it is not clear in the program descriptions how and where this is incorporated. Specific call outs to changes that are incorporated from customer feedback are needed.

Recommendation	Responsiveness
Characterize specific customer input and explain how the proposed changes in the Plan will address said input.	Response provided but does not address recommendation

Pre-Weatherization Barriers

The Plan includes important discussion of the overall prevalence of pre-weatherization barriers and the extent to which they limit participation in energy-saving programs, especially in the context of equity considerations. It is also important to discuss the resources available to address pre-weatherization barriers in this context to determine if they are sufficient.

Recommendation	Responsiveness
Quantify the total funds (e.g., DHS, RGGI) available to remediate pre-weatherization barriers relative to the costs of barrier remediation.	Response partially addresses recommendation Attachment 2 specifies the amount of RIE IESG funding for PWBs and indicates plan to report on PWB spending but does not quantify total funding.

PROGRAM-SPECIFIC COMMENTS

Home Energy Reports

Further explanation is needed for discontinuing HERs. We recognize that there are multiple factors to consider in determining program mix and budget impacts, but the Plan should speak about the decision to drop HERs given their contribution to program savings, relatively low cost, in addition to the potential ramifications of stopping and restarting programs. HERs are an important lead-generating tool for other measures, even though those benefits and savings are not reflected in HER results. The Company should consider the potential for secondary impacts on other programs and measures in the decision to discontinue HERs.

Recommendation	Responsiveness
Retain the existing HER program and determine how to transition to an AMI-enabled behavioral program as seamlessly as possible in 2027-2029.	Response partially addresses recommendation RIE explained its intent to avoid overlapping behavioral-type programs, but Plan does not quantify savings from AMI-enabled behavioral program or describe how AMI Customer Data Portal/Sense platform will transition into claiming savings. The current proposal would eliminate proven cost-effective savings without an immediate alternative to replacing those savings.

Income Eligible Single Family

Recommendation	Responsiveness
Provide customers with information on heat pumps, including their use cases and benefits and resources such as the OER Clean Heat Rhode Island program or New England Heat Pump Accelerator.	No response to recommendation
Expand HEAs to cover decarbonization and assessment of pre-electrification barriers (i.e., assessment of the electrical panels).	No response to recommendation
Develop a heating cost calculator, such as that employed by EnergizeCT . While the current regulatory framework does not allow for fuel switching, replacing fossil fuel space and water heating equipment can provide lower costs to customers; therefore, it would benefit customers to	Response largely addresses recommendation

at least provide operating cost transparency and direct them toward appropriate resources to help them reduce energy bills with heat pumps.	
Assess the effectiveness of implementation through Community Action Programs (CAPS) by exploring different implementation models and outcomes in other jurisdictions.	No response to recommendation
Discuss how the reinstated Inflation Reduction Act programs will integrate into RIE offerings.	Response largely addresses recommendation

EnergyWise Single Family

Recommendation	Responsiveness
Provide customers with information on heat pumps, including their use cases and benefits and resources such as the OER Clean Heat Rhode Island program or New England Heat Pump Accelerator.	No response to recommendation
Expand HEAs to cover decarbonization and assessment of pre-electrification barriers (i.e., assessment of the electrical panels).	No response to recommendation
Develop a heating cost calculator, such as that employed by EnergizeCT and Mass Save. While the current regulatory framework does not allow for fuel switching, replacing fossil fuel space and water heating equipment can provide lower costs to customers; therefore, it would benefit customers to at least provide operating cost transparency and direct them toward appropriate resources to help them reduce energy bills with heat pumps.	Response largely addresses recommendation

Income Eligible and EnergyWise Multifamily

Recommendation	Responsiveness
Share findings from the Multifamily Opportunities study as soon as available.	Response largely addresses recommendation
Add strategies and details about prospecting for projects, recruitment efforts, outreach, marketing,	No response to recommendation

property owner engagement, and enrollment. The Plan narrative suggests that RIE is reactive rather than proactive in terms of enrolling projects. Some other efforts to consider for recruitment include: • Landlord roundtables • Partnerships with contractors that service Multifamily properties, potentially including a finders' fee incentive • Determining when renovations or other project upgrades are planned and piggybacking energy upgrade services at that time • Partnerships with engineering and architectural firms that serve Multifamily properties to educate them on program benefits of participating	
Review the eligibility criteria for MF programs to ensure that naturally occurring affordable housing is not excluded.	No response to recommendation
Discuss how the reinstated Inflation Reduction Act programs will integrate into RIE offerings.	Response largely addresses recommendation

Residential HVAC

Recommendation	Responsiveness
Provide timelines and details about how the Company will make Heat Pump Water Heaters a “strong and growing measure in the electric portfolio” within existing programs. The Plan should provide similar details for scaling Window Heat Pumps.	No response to recommendation
Consider program policy change, like MA and CT, for 2027 and beyond to avoid incentivizing replacements for condensing gas equipment since condensing equipment would likely be installed absent RIE	Response largely addresses recommendation

incentives. This could reduce free-ridership and unnecessary program expenditures.	
Consider opportunities to cost-effectively support windows, as they are virtually the only HVAC-related equipment that is not included in programs.	Response largely addresses recommendation

Residential Consumer Products

Recommendation	Responsiveness
Confirm that incentives are still needed for all products and the market is not saturated for any being incentivized by the program.	No response to recommendation

Residential New Construction

Recommendation	Responsiveness
Provide a timeline for phasing out gas NC incentives. Shifting to an all-electric new construction program would both help address stakeholder priorities related to the Act on Climate and could also be a targeted method of reducing budgets.	Response largely addresses recommendation
Add details about code training and the savings attribution methodology for code compliance.	No response to recommendation

IV. COMMERCIAL & INDUSTRIAL PROGRAMS

CROSS-CUTTING

C&I Opportunities Study and Other Opportunities

Recommendation	Responsiveness
Describe strategies for engagement with market actors and suppliers necessary to advance measures. Discussing these market actors in the Overview section will lay the groundwork for more detailed explanations of how RIE will engage the market to	Response largely addresses recommendation

advance the planned measures while providing excellent service to customers.	
Incorporate more details from the measure-specific implementation plans from the Opportunities Study into the Plan narrative or attach them to Attachment 2 on C&I Programs.	Response partially addresses recommendation Plan identifies some market engagement tactics and QSPs as primary drivers behind “Opportunity” measures, but no text added to describe strategies detailed in Opportunities Study.
Convert the transformation roadmaps for Existing Building Commissioning (EBCx), qualified service providers (QSPs), AMI, and market transformation into committed plans with specific milestones, dates, and metrics in the narrative.	Response provided but does not address recommendation
Given the binding three-year window, recommend committing to at least one AMI-enabled C&I use case with a 2027–2028 deliverable (e.g., targeting for Retrofit lead generation or M&V for a custom end use) so the roadmap produces value within the three-year term. Launching C&I AMI functionality directly supports the Plan Priorities theme on AMI-enabled targeting, design, and evaluation. As drafted, the four-workstream roadmap is described at a high level and defers concrete applications to “where supported by evidence.”	Response partially addresses recommendation Plan references potential AMI use cases, but no commitments to specific use cases called out for C&I sector as was done for Residential customers (Sense App)
Provide more detail on the CHP eligibility change from a 45% threshold to an AESC-based net-emissions test, including more definition on how the baseline will be established and the eligibility of EE measures to count towards the emissions reduction.	Response largely addresses recommendation
Clarify how RIE determines whether a customer requires an account manager, as the narrative suggests that all customers can access support from account management since the “Large C&I” programs are technically open to all, regardless of consumption.	Response provided but does not address recommendation
Please provide context on the number of RIE account managers and how many customers they serve.	Response provided but does not address recommendation

Initiative-Program Savings Attribution

Recommendation	Responsiveness
Provide a process description and attribution table which maps each initiative to its corresponding program.	No response to recommendation

Digital Marketing to C&I Customers

Recommendation	Responsiveness
Include metrics/analytics from digital marketing efforts, especially data that can help assess the efficacy of these efforts.	Response largely addresses recommendation

Customer Listening Sessions

The main text states that input from the listening sessions informed the planning process by reinforcing the need for program designs and delivery strategies that are accessible, customer-centered, and responsive to different customer circumstances. These themes helped inform Rhode Island Energy's approach to customer engagement, equity, workforce and contractor coordination, and program implementation for the 2027–2029 Plan. This is great to see, but it is not clear in the program descriptions how and where this is incorporated. Specific call outs to changes that are incorporated from customer feedback are needed.

Recommendation	Responsiveness
Characterize specific customer input and explain how the proposed changes in the Plan will address said input.	No response to recommendation

Streamlining Program Services

Recommendation	Responsiveness
Define interactions and differences between Project Expeditors and explore whether consolidating these roles would provide beneficial simplicity.	Response partially addresses recommendation Plan text not modified to indicate that PEXs were lighting focused, but edits do not clarify that PEX and QSP roles will be consolidated to eliminate complexity

PROGRAM-SPECIFIC INPUT

C&I Retrofit

Recommendation	Responsiveness
Using savings for Energy/Heat Recovery Ventilators in the Massachusetts eTRM, the program would have to support over 30,000 ERV/HRV installations to achieve the planned savings values. Please explain the underlying assumptions behind these planned savings and market interventions required to create this level of activity, especially given the complexity of ERV/HRV retrofits.	Response partially addresses recommendation Plan text references QSPs that will support ERV/HRV, but no explanation of activity levels required to achieve planned savings
Examine incentives and strategies to promote Variable Refrigerant Flow Heat Pumps, as existing incentives may not be sufficient to drive the planned level of activity.	Response provided but does not address recommendation
Confirm whether Existing Building Commissioning (EBCx) opportunities identified in the C&I Opportunities Study are captured under Energy Management – Custom measure in the Benefit-Cost Model. This measure, which is still one of the top-saving measures in the three-year plan, has lower planned savings than 2025 actuals.	Response largely addresses recommendation
Provide metrics which indicate the effectiveness of each initiative, such as planned and achieved savings and budgets, if available. This will help identify whether specific initiatives require refinement or are performing well and present opportunities to scale up.	Response largely addresses recommendation
The Plan states that based on the results and reports from Energy Star Portfolio Manager and the software's energy use intensity scores and rankings, customers can use Rhode Island Energy's Project Expeditors to identify and implement specific energy efficiency opportunities in the buildings. Instead, RIE should proactively use this data to target customers rather than the other way around.	Response provided but does not address recommendation

C&I New Construction

Recommendation	Responsiveness
Savings assumptions for electric Process measures seem high given that savings are incremental in new construction, the assumptions seem high. Please explain the underlying assumptions behind these planned savings and whether they are realistic expectations.	Response provided but does not address recommendation
There is no discussion of the Codes & Standards measure, which is a top measure for C&I NC lifetime savings. Given the magnitude of savings, and unique nature of the measure, it warrants discussion in the Plan. Please include savings methodology, baseline, and evaluation plan.	Response largely addresses recommendation
Revise approach and/or correct text for Pathway 2 which indicates that commissioning agents are engaged at the end of new construction, as this suggests potential for wasted spending. In addition, confirm whether energy codes requiring commissioning impact the new construction pathways.	Response provided but does not address recommendation

Small Business Direct Install

Recommendation	Responsiveness
Some measures including Transformers and Custom Refrigeration either have lower cost-to-achieve lifetime savings or higher savings in 2025 than in the Plan. Please consider opportunities to further scale these measures to deliver cost-effective savings.	Response largely addresses recommendation
Report year-over-year changes in participation rate over time to better determine the effectiveness of equity-focused strategies for small businesses.	Response provided but does not address recommendation
Add eligible populations and recent participation rates (e.g., from the prior three years) to this program's narrative text.	Response provided but does not address recommendation

Define how communities are targeted for Main Street campaigns.	Response provided but does not address recommendation
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C&I Multifamily

Recommendation	Responsiveness
Add strategies and details about prospecting for projects, recruitment efforts, outreach, marketing, property owner engagement, and enrollment. The Plan narrative suggests that RIE is reactive rather than proactive in terms of enrolling projects.	Response provided but does not address recommendation
Add eligible populations and recent participation rates (e.g., from the prior three years) to this program's narrative text.	Response provided but does not address recommendation

V. OTHER AREAS OF FOCUS

Evaluation, Measurement, and Verification

Recommendation	Responsiveness
Discuss the application of innovative techniques beyond stating that they exist. While we agree that RIE shouldn't employ these techniques just for the sake of using them, there is merit to using them that can produce real benefits that benefit customers, implementers, program administrators, and other market actors.	No response to recommendation
Add more specifics about monthly EM&V calls and standard practices for study review that RIE, the C-Team, and OER have established.	No response to recommendation

Demonstrations, Pilots, and Assessments

Recommendation	Responsiveness
As it stands, this attachment only includes a demonstration for replacement of refrigerants with high global warming potential. Given the extent of	Response provided but does not address recommendation

programmatic changes related to AMI, strongly recommend a comprehensive update to this attachment to include AMI-enabled offerings, efforts, and technologies.	
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Data-specific Comments

These comments stem from quantitative review of the Plan Benefit-Cost (BC) Models. Several documents and data points served as reference points for this review, including the Technical Reference Manual (TRM) Database, 2026 Plan, and recent program results.

Recommendation	Responsiveness
Confirm whether the lifetime savings values for Energy Recovery Ventilators and Heat Recovery Ventilators across different pathways were intentionally set to be equal.	Response largely addresses recommendation
The following offerings/measure has savings in 2027 and 2028, which decline to zero in 2029. Please confirm this was intentional/necessary, due to factors such as code updates, or correct the BC Models to include anticipated savings: • Building Analytics • Boiler, Draft Fan • Building Operator Certification • Building Exhaust Fan	Response largely addresses recommendation
Several measures had savings in the 2026 Plan BC Models which were not included in the 2027-2029 BC Models. Please confirm this was intentional/necessary, due to factors such as changes to program offerings, or correct the BC Models to include anticipated savings: • 2027 Electric Large C&I New Construction AirCChiller - 150to300T • 2027 Electric Large C&I New Construction Commercial Refrigeration • 2027 Electric Large C&I New Construction DHW ECM Pump - 1/8 to 1/6 HP	Response partially addresses recommendation The following measures still have 0 planned savings with no explanation in Plan narrative: • 2027 Electric Large C&I New Construction AirCChiller - 150to300T • 2027 Electric Large C&I New Construction Commercial Refrigeration • 2027 Electric Large C&I New Construction DHW ECM Pump - 1/8 to 1/6 HP • 2027 Electric Large C&I New Construction Water Source Heat Pump

• 2027 Electric Large C&I New Construction Dishwasher - High Temperature Single Tank Conveyor • 2027 Electric Large C&I New Construction Hot Food Holding Cabinet - Full • 2027 Electric Large C&I New Construction Water Source Heat Pump • 2027 Electric Large C&I Retrofit Boiler, Feedwater Pump • 2027 Electric Large C&I Retrofit Cooling Tower Fan • 2027 Electric Large C&I Retrofit Custom HVAC • 2027 Electric Large C&I Retrofit MTVFD-BLDG EXHST FAN • 2027 Electric Large C&I Retrofit MTVFD-HEAT HW PUMP • 2027 Electric Large C&I Retrofit Sensors • 2027 Electric Large C&I Retrofit Water Source Heat Pump - circulator pump • 2027 Electric Residential HVAC AC DOWNSIZE • 2027 Gas EnergyWise Multifamily Duct Insulation, MF • 2027 Gas EnergyWise Multifamily Duct Sealing • 2027 Gas Income Eligible Multifamily Air Sealing • 2027 Gas Income Eligible Single Family Programmable Thermostat, Gas • 2027 Gas Income Eligible Single Family Wi-Fi Thermostat, Gas • 2027 Gas Large C&I New Construction Boiler - 96% AFUE < 300 MBU • 2027 Gas Large C&I New Construction Gas Oven Upstream - Rack Oven • 2027 Gas Large C&I Retrofit WiFi Thermostat - Heat Only, Custom • 2027 Gas Small Business Direct Install HVAC - Controls and EMS	• 2027 Electric Large C&I Retrofit Boiler, Feedwater Pump • 2027 Electric Large C&I Retrofit Custom HVAC • 2027 Electric Large C&I Retrofit MTVFD-BLDG EXHST FAN • 2027 Electric Large C&I Retrofit MTVFD-HEAT HW PUMP • 2027 Electric Large C&I Retrofit Sensors • 2027 Electric Large C&I Retrofit Water Source Heat Pump - circulator pump • 2027 Electric Residential HVAC AC DOWNSIZE • 2027 Gas EnergyWise Multifamily Duct Insulation, MF • 2027 Gas EnergyWise Multifamily Duct Sealing • 2027 Gas Income Eligible Multifamily Air Sealing • 2027 Gas Income Eligible Single Family Programmable Thermostat, Gas • 2027 Gas Income Eligible Single Family Wi-Fi Thermostat, Gas • 2027 Gas Large C&I New Construction Boiler - 96% AFUE < 300 MBU • 2027 Gas Large C&I New Construction Gas Oven Upstream - Rack Oven • 2027 Gas Large C&I Retrofit WiFi Thermostat - Heat Only, Custom • 2027 Gas Small Business Direct Install HVAC - Controls and EMS
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