Introduction and Summary

The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company" or "RIE" or "Rhode Island Energy" or "RI Energy") circulated its *2027-2029 System Reliability Procurement ("SRP") Three-Year Plan* to external stakeholders on July 30, 2026, for comment by August 28, 2026, and second draft on September 17th, 2026, for comment by September 24th, 2026. The Company held additional one-on-one discussions with members of the Division of Public Utilities and Carriers ("Division") on February 5, 2026, and July 28, 2026, Acadia Center on September 8, 2026, and members of the Energy Efficiency and Resources Management Council ("EEC") and their consultant team ("C-Team") on June 25, 2026, July 30, 2026, and September 2, 2026. Rhode Island Energy prepared this document to summarize all stakeholder feedback received and the Company's proposed responses. Revisions noted within this document have been incorporated into the final draft of the *2027-2029 SRP Three-Year Plan*, which was distributed on October 8, 2026.

Summary of Stakeholder Comments

Stakeholder / Organization	Feedback Items	Source / Channel
Rhode Island Energy Efficiency and Resources Management Council ("Energy Effi	13	Stakeholder Meeting, Written Comment
Rhode Island Office of Energy Resources ("OER")	12	Stakeholder Meeting
Acadia Center	2	Stakeholder Meeting, Written Comment

Executive Summary

This executive summary highlights some themes across comments and provides a general response to those themes. Specific responses to individual comments are captured in this document after the executive summary.

As an initial matter, the Company appreciates the time and attention that the Division, EEC, OER, and the Acadia Center have given to SRP. We appreciate the comments and look forward to continuing the discussion around SRP.

The Company believes there is a theme in the comments that suggests the SRP process is "broken" because there is not a non-wires or non-pipes solution. This assessment reveals a fundamental misunderstanding of the purpose of SRP in maintaining electric and gas distribution system reliability and adherence with the Least-Cost Procurement Standards. Our focus is on the process, and we do not presume the success or failure of any given technology for any given system need. The efficacy of the process cannot be determined by the outcomes, and pre-determining outcomes cannot, by definition, be consistent with Least-Cost Procurement. The Company understands that certain stakeholders want to see non-wires and non-pipes solutions – indeed, if a prior non-wires solution proposal had worked out then

Business Use

the Company would be in an easier place responding to comments right now. But the Company cannot pre-judge or give undue preference to any solution type, as per LCP Statute and Standards.

Evidence of the process being effective *does* include (1) the Company has identified opportunities for system reliability procurement, (2) the Company has issued solicitations for system reliability procurement, and (3) the Company has evolved its RFPs terms to allow for additional flexibility for system reliability procurement.

Claims about the process not working because solutions are not in place are both factually incorrect (opportunities have been identified and market solicitations have occurred) as well as inconsistent with Least-Cost Procurement (which does not presume a solution type).

Another theme of the comments is around the initial steps in the process – identifying system needs and screening for potential solutions. Some comments seem to imply these steps are completed in a vacuum; this is incorrect. These steps are conducted with substantial collaboration with the Division. Furthermore, results of these steps are included in the Company's annual ISR filings and in its Long-Range Plans, both filed with the Public Utilities Commission and subject to a fully transparent process with regulatory scrutiny followed by oversight of approved projects and spending. Indeed, stakeholders can access information in these dockets or intervene directly in these dockets to provide their own evidence and witness testimony. The Company sympathizes with stakeholders that the processes are technical and the administrative burden to participate is substantial. However, duplicating these existing and proven processes is not a solution.

Lastly, there seems to be an underlying misperception that the Company has a vested interest in pursuing utility reliability procurement in place of system reliability procurement. This misperception is both false and myopic. As with any business, there are more facets to the Company's measures of success than magnitude of capital investments. Case in point: the Company would *never* sacrifice safety, reliability, or customer satisfaction for the sole objective of improving its short-term profits. For productive discussion to happen between stakeholders and RIE, it is imperative for stakeholders to see that there is more to running a long-standing healthy business than immediate-term profits. Once we have mutual understanding of this foundational business strategy, then we can begin more productive conversations and work toward common goals, not as adversaries, but as teammates sharing a common vision for safe, reliable, affordable, and sustainable solutions to meet the needs of Rhode Island customers.

Business Use

Responses to Comments from Rhode Island Energy Efficiency Council

Thank you for the comments and suggestions on the draft 2027-2029 SRP Three-Year Plan. The following synthesizes the comments provided and Rhode Island Energy's response, including annotation of the specific resulting revisions or an explanation for why no revisions were made. Comments are indexed for ease of reference for future discussions.

EEC-1

Comment:

Regarding the SRP process: noted the current SRP process has not led to any successful NWA/NPS projects. Council Priority: ensure robust consideration of non-wires and non-pipes alternatives.

Response

System Reliability Procurement is a process, not an outcome. The Company has identified multiple potential opportunities, conducted a non-wires pilot from 2012-2017, and has issued multiple requests for proposals since 2017. The issue is not the identification of opportunities; rather, the issues are market interest in opportunities, technical viability of the proposed solutions meeting the system needs, and cost economics of the solutions relative to the best alternative utility reliability procurement solution.

EEC-2

Comment

The SRP Process relies on RIE bringing forward NWA/NPS; Council Priority: Provide transparency into analytical methods & assumptions

Response

Correct, the SRP process does rely largely on Rhode Island Energy to identify potential opportunities for non-wires and non-pipes solutions, but the process also includes regulatory participation, scrutiny, and oversight. As such, there is transparency in the Company's planning and there are opportunities for non-Company parties to suggest alternative solutions.

To be clear: the Company seeks potential opportunities for non-wires solutions and non-pipes solutions as standard business procedure. It is in the Company's business interest to identify the lowest-cost, best fit solutions to alleviate issues on its electric and gas distribution systems – the Company views non-wires and non-pipes solutions to be serious options that can potentially result in lower costs for customers.

The Company is open to further describing its planning processes, including identifying specific problems or gaps with its current processes and brainstorming value-add solutions to those specific identified issues. Consistent with our response to one of OER's comments, we plan to review items listed below with the SRP TWG in the first half of 2027 and we welcome further questions and discussion!

- What costs are being compared in an evaluation?
- How does the ISR work and how might stakeholders follow along?
- Review of the history of SRP, from the 2012-2017 TLC Pilot to the most recent Woonsocket RFP
- Brainstorming session for outreach channels and strategies for future RFPs
- Review of area studies and upcoming study timelines
- Brainstorming for a third-party supplier forum to understand needs

Business Use

EEC-3

Comment

External input earlier in NWA/NPS ID process can ensure sufficient market interest in opportunities put out for RFP. Council Priority: address structural and process factors that influence investment decisions.

Response

Fantastic support. The Company welcomes insight from the Council and stakeholders into market interest for opportunities, which the Company notes is a concern in its response to EEC-1.

To address this feedback, RIE revised language to the SRP Three-Year Plan to reflect that, upon a potential NWA/NPS opportunity arising and passing the screening criteria other than market interest, the Company will work with stakeholders to gain insight into market interest prior to advancing.

EEC-4

Comment

During the August 20th EEC meeting, it was noted by the C-Team our inclusion of Gas Segment Decommissioning Pilot research in the report. Further clarity needed at EEC meeting regarding the stance of the C-Team and Council.

Response

The Company is open to further discussions. Note that the Company will submit an SRP Investment Proposal on its proposed gas segment decommissioning pilot research, which will be separate from the SRP Three-Year Plan, and which will provide further detail about the research activities, alignment with LCP Standards, and benefit-cost assessment. As per the LCP Standards, the Company will coordinate and collaborate with the Council and the Division on this SRP Investment Proposal.

EEC-5

Comment

Although SRP process provides a working solution, no successful projects. Has RIE scoped out new ways or worked with partner utilities/other agencies to get better participation?

Response

Yes, whenever RIE has identified a potential NWA/NPS opportunity, it has exhausted efforts to maximize participation. RIE has engaged stakeholders and third-party vendors through a number of channels, including but not limited to the SRP TWG and existing marketing channels. In some past cases, RIE has issued multiple revisions of the requests for proposal in an attempt to increase participation. Although the Company has made significant efforts in the past, it is always receptive to new ideas to increase participation (and thank you in advance for your ideas!).

Business Use

EEC-6

Comment

Given track record of current process, some updates seem warranted. RIE can suggest what form those updates should take, but at a high level - process could benefit from more front-loaded external input on where NWS candidates may exist.

Response

Please refer to the Company's response to EEC-1. RIE will continue to seek input and assistance wherever feasible with external stakeholders, notably via the SRP Technical Working Group (SRP TWG) meetings. The Company will continue to build off prior efforts to engage with municipal planning commissions in the hopes of learning about large projects at earlier stages, as well as publicizing up-to-date information via its System Data Portal to allow for early engagement. The Company remains open to additional ideas by stakeholders.

EEC-7

Comment

More opportunity upfront for customers, third party providers, regulators and other stakeholders to collaboratively identify overlapping areas of grid constraint (demand for SRP) and NWS opportunities/customer participants (supply for SRP).

Response

The existing process includes collaboration with the Division of Public Utilities and Carriers, including their subject matter experts, to identify system needs and the potential for a solution through system reliability procurement, as well as thorough discussion and oversight from the Public Utilities Commission. Customers, third-party providers, and other stakeholders are welcome to scrutinize any of the Company's public filings and/or participate in the existing regulatory processes. The Company is not opposed to additional engagement with stakeholders but stresses the importance of technical expertise in contributing to productive and timely discussions. RIE will continue to publish new SRP opportunities on the data portal and amplify through outreach channels as soon as they become available.

EEC-8

Comment

Only NWS RFP issued using this process, Staples #112 Reliability 112W43, did not appear to meet these criteria. Notwithstanding the caveat at the bottom that RIE can pursue projects at its discretion - Woonsocket didn't appear to meet these criteria.

Criteria 1: Not an Asset Condition Issue
Blackstone Valley area study identifies much of the equipment at or nearing end of useful life: "The 1210 and 1216 MOAB switches are nearing the end of their operating life cycle", "The 13.8kV riser pole lightning arrestors on the W3 and W4 feeders are 53 years old and at the end of their design life cycle" https://portalconnect.rienergy.com/RI/servlet/servlet.FileDownload?file=015Nu000006oA8n

Criteria 2: Eligible system need or optimization
Summer normal rating (MVA) = 13.4

Business Use

Load reduction needed (MW) = 3
Close to 20% of summer load but RFP asks for 8760 ("all days all hours")
https://portalconnect.rienergy.com/RI/servlet/servlet.FileDownload?file=015Nu000003k7WD

Criteria 3: Sufficient Market Interest
RFP sets a not-to-exceed of $606K net present value over the contract term

Response

RIE met with members of the EEC Consultant Team on 9/2/2026 and provided historical context to the comment above. Here are some additional supporting details. The scope of the wire solution that the Woonsocket NWS RFP was put out to bid for did not include work that addressed the MOAB switches or 13.8kV riser pole lightning arrestors asset condition issues. Eligible system needs include reliability, which is the need the Woonsocket NWS RFP addresses. Since the system need addressed by the NWS is not load relief, the amount of load does not need to be less than 20% of the total load in the area of defined need. While the deferral net present value of the wires solution was $606k, the cost of the non-wires solution was $1.1M, which exceeds the guideline of the non-wires solution costing at least $1M as a proxy for whether the system need is likely to gain sufficient market interest.

EEC-9

Comment

Woonsocket RFP:

"proposed solutions that do not explicitly commit to providing dedicated standby response during summer months may be considered to be nonresponsive to this RFP"

Bidder Q:
"What time(s) of the year do the 3-5 calls take place?"

RIE A:
"Any time there is an fault upstream of the P151 Pine Swamp Rd recloser."

Setting aside whether 8760 storm outage protection is a good NWS candidate, RIE could have provided dates/times when outages have occurred in the past several years; unclear why no specific answer was given.

Response

RIE did not provide dates and times of previous outages because the times of the year that the 3-5 calls can take place are not limited to the times of the year that previous outages have taken place. To solve the reliability issue, the NWS proposal would need to be able to provide contingency capacity year-round. RIE specified a required contingency capacity of 3MWh between May 1 and October 1 and a required capacity of 2.5MWh between October 1 and May 1. This specification grants the NWS proposal 0.5MWh of spare capacity between October 1 and May 1 that does not need to be reserved for contingency response and can be used for market participation.

Business Use

EEC-10

Comment

Another area where RIE could open up the process to more external input is scoring proposals.

SAIFI and CAIDI are measurable but the actual value of lost load (VoLL) is subjective and customer-dependent. RIE making decisions about how reliable the system is and how much it should cost ratepayers should be an open and transparent process w/ deliberate stakeholder input on what benefits and costs are assumed.

https://www.sciencedirect.com/science/article/pii/S1040619022001130

https://www.sciencedirect.com/science/article/abs/pii/S0301421519304288

Response

It is not appropriate for the Company to include external stakeholders as part of the evaluation committee: accountability for the success of the chosen solution ultimately rests solely with the Company; therefore, it is imperative that the Company have exclusive responsibility for evaluating specific proposals.

However, there are two opportunities for stakeholders to engage with the evaluation process generally. First, the Company's process explicitly indicates that "Outcomes of evaluations – including evaluations of third-party and internally-sourced proposals – will be reported annually." Regulators and stakeholders are the key intended audience for this reporting; stakeholders have the freedom to critique the evaluation if the evaluation is deemed inadequate.

Second, the Company welcomes stakeholder input into the evaluation rubric as described in Figure 9, as well as the benefit-cost model used, and during the regulatory proceeding for approval of the system reliability procurement solution.

Regarding the specific example of value of lost load: the Company welcomes feedback from stakeholders on the value of lost load. Indeed, the value of reliability has been an important theme within regulatory proceedings on utility investment over the past several years. Stakeholders should review the record and participate in those proceedings as appropriate.

EEC-11

Comment

This is copy/paste from the 2024-2026 SRP plan. It discusses proposed grid modernization needs that will enable managing loads in response to circuit peaks, and many of these proposals have since been approved and/or installed. Please update this section to reflect the current state of grid mod and AMI roll-out.

RIE should pilot circuit level peak shaving during this cycle in a constrained (but not critically) constrained area identified in a recent area study.

Business Use

See NGrid MA Connected Solutions Plus:
https://www.nationalgridus.com/ConnectedSolutionsPlus

Response

Thank you for flagging this. We have reviewed and updated the footnote.

In regard to piloting circuit-level peak shaving, RIE is open to this idea pending there is a suitable location identified and there is a documented value. The Company will work with stakeholders to deepen its understanding of ConnectedSolutions Plus and will work with internal teams on this idea. Please note that the specifics of ConnectedSolutions are contained in the Company's SRP Investment Proposal for 2027-2029 ConnectedSolutions. Note that this proposal does include locational outreach for peak shaving during peak demand events as a starting point for locational peak shaving.

EEC-12

Comment

Asking third parties, customers and other interested stakeholders to proactively engage in both ISR plans (area studies, etc.) and SRP plans to be able to piece together where NWS/NPA opportunities are is onerous.

Recommendations:
-make area studies more easily digestible and present on them regularly as part of SRP
-Issue RFIs w/ a short-list of your top constraints/candidates, then go to RFP if/when third parties express interest in specific constraints

Response

The intended audiences for area studies and ISR plans are regulators and technical subject matter experts. Although the Division of Public Utilities and Carriers represents ratepayers in all proceedings, and the Public Utilities Commissions considers ratepayer impacts in its decisions, one theme of comments on the system reliability procurement process seems to be an eagerness for non-subject matter experts to engage in these technical discussion. The Company is open to this engagement if there is a clear value proposition – in other words, there needs to be a reasonable expectation of incremental insight from non-technical stakeholders. At this time, though, the Company has not seen credible evidence of stakeholders having the requisite system engineering expertise (e.g., such as would be seen with an expert consultant) nor has the Company seen interest from third-party solution providers who have that level of technical expertise in house. Also note that the Public Utilities Commission has opened a docket to consider an intervenor compensation program (Docket No. 26-33-GEN), which potentially could be leveraged to retain expert consultants to evaluate ISR and SRP plans.

Regarding the recommendation to issue an RFI: RIE has, in the recent past, developed an RFI for NWA/NPS prior to going out to bid. However, after discussion with SRP TWG stakeholders, the Company was urged to go straight to RFP. RIE will continue to work with stakeholders, including the SRP TWG, to advise of RFP opportunities as early as feasible, and welcomes further discussion on ways to improve area study coordination. RIE will also continue to publish all area studies and NWS RFPs on the system data portal as soon as they are available.

Business Use

EEC-13

Comment

Making these public and getting more stakeholders involved in making decisions about the grid would improve outcomes and is consistent w/ multiple RI policies.

OER Energy Justice -
https://energy.ri.gov/energy-justice

"Procedural: Broad and meaningful participation in the decision-making process"

DEM Environmental Justice Policy -
https://dem.ri.gov/sites/g/files/xkgbur861/files/2023-09/ridem-environmental-justice-policy_0.pdf

"meaningful involvement, providing people with a sense of collective ownership through recognition of community autonomy, and effectively participate in conversations and decisions about environmental issues of interest"

Response

Customer satisfaction is an important business strategy for the Company. Customer satisfaction stems from a number of factors, including affordability and reliability. The Company routinely seeks customer and community input on projects and programs. However, when it comes to owning, operating, and managing distribution systems, it is the Company's sole obligation to provide service in line with the statutory duties of public utilities and consistent with the regulatory requirements that have been put in place. As such, it is the Company that is solely accountable for the outcomes of its decisions. The Company always seeks to learn from stakeholders, to understand the preferences and needs of customers, and to balance policy and regulatory objectives in its operation.

Furthermore, the Division of Public Utilities and Carriers represents ratepayers in all proceedings, and the Public Utilities Commission considers ratepayer impacts in its decisions. Also note that the Public Utilities Commission has opened a docket to consider an intervenor compensation program (Docket No. 26-33-GEN).

Business Use

Responses to Comments from RI Office of Energy Resources

Thank you for the comments and suggestions on the draft 2027-2029 SRP Three-Year Plan. The following synthesizes the comments provided and Rhode Island Energy's response, including annotation of the specific resulting revisions or an explanation for why no revisions were made. Comments are indexed for ease of reference for future discussions.

RI OER-1

Comment

OER would like to see a breakdown of what NWA/NPS projects have been previously considered (noted Woonsocket) what were estimated costs of those offers that were used to figure out whether to go out to RFP, and final engineered costs of URP solution to see difference. OER generally wants visibility into company logic, which falls in line with EEC priority of "addressing structural and process factors that influence investment decisions".

Response

RIE addressed this comment during its SRP TWG meeting on 8/18/2026. It was noted during the call that the Company could put this information together to level-set. The Company further noted that the relevant economic cost comparison is deferral value, not total project costs. This takes into account total lifetime investment (i.e. a URP asset could have a 30-year lifespan, but NWA may be 10, which affects cost comparison). Below please find a table that further illustrates historic SRP projects, which was also filed as part of the Company's FY25 ISR plan.

Naming Convention	Associated Area Study	System Need Identified	Cost Estimate of Next Best Alternative Utility Reliability Procurement when RFP was issued	Inflation Adjusted Cost Estimate of Next Best Alternative Utility Reliability Procurement when RFP was issued	Latest Forecasted Cost	Year in which RFP was issued for system reliability procurement solution	Types of technology proposed for non-wires solution	Order of magnitude cost of non-wires solution(s) proposed	Status
Bristol 51	East Bay	Contingency Load Reduction – 3MW	$2M			RFP issued 2020	Energy Storage	$1.1M	Closed – proposal(s) deemed technically insufficient to meet system need
Tiverton New Feeder – NWA Pilot	None – Pilot	Load Reduction 1.0MW	$2.9M			No RFP, Pilot executed 2011-2016 in collaboration with OER	Targeted Energy Efficiency, Solar	$3.6M	Closed

Business Use

Tiverton New Feeder	None	Load Reduction 250kW, 1MWH	$2.9M			2017	Energy Storage	$60k to $90k annual budget	Closed – Did not proceed. Equipment Delays and Uneconomical.
Bonnet 42F1 Feeder	South County East	Load Reduction 1.2MW, 25 MWH/yr for 12 years	$570k			RFP issued in 2018 and reissued in 2019	Energy Storage, Virtual Power Plant with a mix of solar and backup generators	$1.1M-$5.8M	Closed – proposal(s) more costly than the best alternative utility reliability procurement
Narragansett 17F2 and 42F1 Feeder	South County East	Load Reduction 1.8MW, 76 MWH/yr for 10 years	$1.6M			2018	Energy Storage	$3.8M	Closed – proposal(s) more costly than the best alternative utility reliability procurement
South Kingstown 59F2 and 68F2 Feeders	South County East	Load Reduction 3.1MW, 14-18 MWH/yr for 10 years	$1.7M			2019	Energy Storage, Virtual Power Plant with a mix of solar and backup generators	$2.3M to $28M	Closed - proposal(s) more costly than the best alternative utility reliability procurement
Staples 112W43 Reliability	Blackstone Valley South	High outage frequency and duration averages	$1.1M	$1.9M	$0.881M	2024	None	None	Closed - no proposals

RI OER-2

Comment

OER would ask the company to add a post-mortem process to be conducted either in the lead-up to or during the development of the Three-Year SRP development process. The post-mortem should make an accounting of the projects on both the gas and electric sides of the business which were screened for possible solutions to provide comparisons of the projected costs used to screen for solutions, current projections or final engineered costs, and the timelines for implementation. This post-mortem should provide value to the company and stakeholders both by providing ground-truthing to the screening and

Business Use

cost projections portions, but also provide opportunity for greater integration of planning between the two systems.

Response

Technically all projects are screened for NWA/NWS so the Company does not recommend a post-mortem process for *all* projects. However, we can and will provide the inflation-adjusted projected costs used during screening, current projected costs or final engineered costs, and updated timelines for the projects that meet the NWA/NWS screening criteria like we did with Staples in the response to RI OER-1. All final costs are included in ISR Reconciliation dockets and scrutinized by regulators and intervenors in docket proceedings. RIE can compile these figures for discussion with the SRP Technical Working Group.

RI OER-3

Comment

It would also be helpful if this post-mortem could be shared (perhaps by redacting applicant names or removing them). Applicants should be able to learn why their project were not selected (or why it was selected).

Response

As part of the RFP process, applicants are informed why their proposals are not selected.

RI OER-4

Comment

This stage is area OER requests more detailed, ground-truthed assessment of the URP solution. The recommendation above for a post-mortem process is intended to address this, providing a transparent opportunity for the company to examine the cost estimates used initially to understand if any stages of the screening criteria could be refined.

Response

It's the Company's opinion this post-mortem process adds limited additional information the Company hasn't already provided. However, the Company understands that this post-mortem process might provide greater visibility to external stakeholders. The Company is open to other efforts to refine the screening criteria as the market and discussions evolve in the future.

RI OER-5

Comment

OER would like to see more detail about how RI Energy will share news of the solicitation in this section. What other entities and organizations will it be shared with? SEPA and ACT members are some possible examples. What other listserves can it be shared with for effective outreach?

Response

The Company is receptive to including any new recommended entities and organizations. In its last RFP, the Company leveraged the Energy Efficiency Council, the DG Board, OER's Solar Stakeholder distribution list, and the SRP TWG, alongside the Company's own distribution list. The Company very much appreciates any and all suggestions for channels through which RFPs can be shared.

Business Use

RI OER-6

Comment

This should be a helpful addition moving forward, and OER would like this to extend reporting spanning from identification of system need through in service date. This is in order to capture the final cost and construction timeframe. While the annual report should likely include a discreet annual list for each particular year, adding this longer timescale as an appendix would be ideal to help provide transparency to stakeholders, and OER is happy to work with the company and stakeholders to help develop this. This reporting could then also serve as a helpful compilation tool for the total planning cycle review/post-mortem process previously described.

Response:

Great idea – the Company would absolutely be open to providing updates on status and success of the selected non-wires or non-pipes solution through its in-service date (and even following plant in service to monitor how the solution is meeting the system need). However, the Company cautions against duplication of reporting for utility reliability procurement solutions in the event the system reliability procurement solution is not selected – such reporting already occurs with regulators in other forums.

RI OER-7

Comment

What stakeholders will be included in the process of identifying projects? What will that look like? OER would be interested and open to working more closely with RI Energy on this work.

Response

The Thermal Energy Network (TEN) and Jobs Act explicitly established a robust process for soliciting recommendations from diverse stakeholders. The Act requires the Rhode Island Public Utilities Commission to appoint an eleven-member Thermal Energy Network Task Force comprised of members representing the Office of Energy Resources, the Division of Public Utilities and Carriers, the RI AFL-CIO, RI Buildings and Construction Trades Council, public utilities subject to the Act's provisions, utility workers, steelworkers, community and environmental/climate-justice advocacy, and state/municipal planning. The role of the Task Force will be to advise the PUC and utilities on the deployment of TENs with respect to:

- Identifying and aligning funding
- Coordination between utilities, municipalities, and private developers
- Workforce transition and labor standards
- Locations and models for projects
- Framework to guide state planning and deployment

The Task Force is charged with submitting a report to the Public Utility Commission with actionable recommendations for consideration in state planning pertaining to criteria for cost effectiveness, potential rate structures for TENs, training and transition for workers, and rules for cost recovery.

Business Use

Additionally, to the extent Rhode Island Energy determines it to be appropriate to address its obligations under the TEN Act in coordination with the SRP 2027-2029 Plan, the Company will engage the SRP TWG.

RI OER-8

Comment
2029?
Response
Thank you for your comment, and great catch! Edited to reflect 2029.

RI OER-9

Comment
OER welcomes and appreciates these continued refinements to the SDP and looks forward to the Company's continued investment in them.
Response
Thank you for your support. We greatly value our close working relationship with RI OER and our other external stakeholders and look forward to continuing to work together to progress SRP efforts.

RI OER-10

Comment
This one is especially interesting.
Response
Thank you for the feedback. No noted response from the Company.

RI OER-11

Comment
Thank you to the team for adding this functionality. Great addition to the portal!
Response
Thank you for the feedback and support!

RI OER-12

Comment
A question was asked during the 9/24 EEC meeting about how often the portal was updated. It is still not clear how often this has been updated in the past. Can you add a line here about how often it is currently updated and whether the annual update by the end of Q1 is an improvement to the previous cadence of updates?
Response
Thank you for your question. The SDP is updated annually, which continues the cadence the Company has adhered to previously.

RI OER-13

Comment

Business Use

OER appreciates that this working group will continue and respectfully requests that the quarterly meetings for 2027 are scheduled for the entire year in January in coordination with the working group members and agendas are circulated in advance of each meeting.

Response

You're absolutely right – scheduling for a year in advance (along with ideas for topics for each meeting) will help the SRP TWG better manage their resources and time, and come ready to engage in more productive conversations. Given the themes of the comments on the SRP 3YP, it might even be a good idea to have more frequent meetings in the first half of the year to provide baseline information on the following topics:

- What costs are being compared in an evaluation?
- How does the ISR work and how might stakeholders follow along?
- Review of the history of SRP, from the 2012-2017 TLC Pilot to the most recent Woonsocket RFP
- Brainstorming session for outreach channels and strategies for future RFPs
- Review of area studies and upcoming study timelines
- Brainstorming for a third-party supplier forum to understand needs

Open to other topic ideas as well!

Business Use

Responses to Comments from Acadia Center

Thank you for the comments and suggestions on the draft 2027-2029 SRP Three-Year Plan. The following synthesizes the comments provided and Rhode Island Energy's response, including annotation of the specific resulting revisions or an explanation for why no revisions were made. Comments are indexed for ease of reference for future discussions.

ACADIA CENTER-1

Comment

Broader, systemic observation - wants to understand all info that is available; outside advocates have trouble aligning how RIE is responsible for bringing forward NWA/NPS alternatives when incentive is for company to go with URP solution. Hard to take at face value without better understanding reasons why we don't go with NWA.

Response

RIE does *not* have incentive to choose a URP solution over a technically and economically viable SRP solution. As dictated by the LCP Statute and Standards, which RIE must adhere to, RIE's responsibility is to identify and commit to the least-cost solutions, regardless of what that solution may be. Furthermore, it is in the Company's best interest to proceed with the best-fit, lowest-cost solution for distribution system needs – doing so results in the best outcomes for our customers at the lowest costs, which leads to a healthy business with lower risks of regulatory or statutory backlash. RIE provides significant visibility into its area study process and NWA request for proposal process, which demonstrates alignment with the LCP Standards. RIE will continue to work with stakeholders throughout the SRP process, including seeking support for circulating RFPs and disseminating results of RFPs.

ACADIA CENTER-2

Comment

"Notably, the current SRP process has not met this basic standard for success, as it has not resulted in any successful NWS or NPS projects.1 Acadia Center posits that this fundamentally ineffectual outcome reflects deficiencies in the current SRP process. As such, a change in process is necessary."

"Given the lack of successful NWS and NPS SRP projects, the SRP would benefit from engaging external parties who might respond to eventual RFPs at an earlier stage in the process."

"The SRP process should be modified to allow early access to external parties who may have insight into or interest in identification of locations where energy delivery is constrained and where NPS or NWS may be feasible. Ideally, this locational targeting should coordinate examination of constraints across the electric and the gas. distribution systems with NWS and NPS feasibility, depending on applicability, to provide a holistic overview of demand and cost reductions across Rhode Island Energy's entire energy delivery system."

Business Use

"Acadia Center recommends implementing targets for both demand reduction and third-party contributions to that demand reduction, with these targets ramping up over time."

Response

This is a critical point to understand: the basic standard for success is *not* having a non-wires or non-pipes solution in service. Such an outcome-based standard makes presumptions that the Company has not seen pan out in real market procurements, nor is such a standard consistent with Least-Cost Procurement.

The standard for success is weighing all solutions on a level playing field. As evidenced by prior procurements, there have not yet been any non-wires or non-pipes solutions that have met LCP standards more so than the best alternative utility reliability procurement.

The Company respectfully suggests one helpful avenue of advocacy would be to work with third-party solution providers and policy makers to reduce costs of those solutions so that they may be more cost competitive with utility reliability procurement.

As noted in EEC-1, above, RIE has revised language to the SRP Three-Year Plan to reflect that upon a potential NWA/NPS opportunity arising and passing screening criteria other than market interest, the Company will work with stakeholders to gain insight into market interest prior to advancing. Please also review the Company's responses to other comments about the criticality of technical expertise in identifying opportunities for non-wires and non-pipes solutions.

Business Use