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Comments on Rhode Island 2024-2026 Energy Efficiency Plan Draft Narrative

To Whom It May Concern:

Acadia Center appreciates the opportunity to submit comments on Rhode Island Energy (the Company)'s 2024-2026 Three-Year Plan Narrative, now and at additional milestones throughout the remainder of 2023. These comments are intended to supplement discussions held during Energy Efficiency Technical Working Group (EETWG) and Energy Efficiency Equity Working Group (EWG) meetings, and during public comment opportunities before the Energy Efficiency and Resource Management Council (EERMC).

Specific, measurable equity commitments and accountability

While equity may be part of the Company's overarching strategic objectives, Acadia Center expects to see more **specific, measurable commitments¹ which the Company intends to undertake during the 3-year program period in response to the fourteen (14) recommendations of the Energy Efficiency Equity Working Group (EWG).** Metrics should be established for each of these commitments which are quantifiable, time-bound, and supported by reporting data and other relevant information. What constitutes success should also be established for each commitment using specific levels of attainment for relevant metrics. Stakeholders of the EETWG, EWG, and EERMC should have the opportunity to provide feedback on such **metrics and determinations of success.** Further, the Company should report on its progress toward achieving its equity commitments on a quarterly basis.

The Equity Working Group (EWG) should enable stakeholders to provide feedback, request additional information, and meaningfully inform the Company's planning processes. In Year 3, Acadia Center would like to see the active engagement of Company staff knowledgeable on the status of equity commitments, as well as a robust effort to ensure the continued participation from a representative group of stakeholders². **The EWG should be the space for more in-depth discussions of the Company's equity commitments in relation to each EWG recommendation, progress to date, and determinations of success.** More than quarterly meetings, with appropriate participation from Company

¹ On August 18, 2022, the EERMC Consultant Team provided a detailed review of the Company's Equity Commitment Updates, which provided similar comments and distinctions between *recommendations*, *commitments*, *metrics*, and *determinations of success*.

² The kick-off meeting of Year 3 of the EWG held on June 21, 2023 had fewer stakeholders represented than in previous years. At this meeting, a URI Energy Fellow of the Company provided a verbal report on the status of equity commitments and Company staff present were not prepared for a more robust discussion.

staff and reporting materials shared in advance, are required to facilitate a more comprehensive understanding of current activities, the scope and status of commitments, as well as determinations of success for the fourteen (14) individual equity recommendations.

Principles of Next Generation Energy Efficiency

Acadia Center's [Next Generation Energy Efficiency](#)³ initiative focuses on energy savings as a core energy system resource, but is also centered on meeting **climate, environmental justice, and electrification goals**. It refocuses efficiency programs so that they 1) directly improve poorer quality housing that disproportionately burdens lower-income residents and communities of color; 2) embrace clean electrification technologies for heating and cooling; and 3) do more to attain ambitious reductions in greenhouse gases and local air pollution.

Acadia Center respectfully restates its general recommendations from previous EE plan filings, namely that the Company pursue a model of Next Generation Energy Efficiency, including efforts to:

- Update cost-effectiveness testing to fully account for emissions, equity, public health and safety benefits.
- Devote resources to aggressively coordinating remediation of pre-weatherization barriers, especially in underserved and environmental justice neighborhoods.
- Offer the same robust incentives for weatherization to every home, regardless of fuel.
- Embrace whole-home electrification and weatherization measures to increase savings from retrofits.
- Design heat pump incentives to reflect electric energy and summer peak demand savings that cold-climate heat pumps achieve compared to standard or single-stage heat pumps.
- End incentives for new gas space heating and water heating equipment in new construction.
- Require the Company to include all health, safety, comfort, and environmental benefits associated with energy efficiency and electrification investments in all Company marketing materials.

Sincerely,



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³ Acadia Center, 2021. "Next Generation Energy Efficiency, Pivoting Energy Efficiency to Address Climate Change, Environmental Justice, and Underserved Consumers." <https://acadiacenter.org/resource/next-generation-energy-efficiency-brief/>