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Comments on Draft 2027-2029 System Reliability Procurement Plan

To Whom It May Concern:

I am writing to provide comments on behalf of Acadia Center regarding Rhode Island Energy's draft 2027-2029 System Reliability Procurement (SRP) plan. [Acadia Center](#) is a nonprofit organization with over 25 years of experience dedicated to advancing transformative clean energy solutions that promote a livable climate and a more equitable economy in the Northeast United States and neighboring areas, including decades of work on these issues in Rhode Island.

System Reliability Procurement (SRP) is designed as a framework for evaluating whether Non-Wires Solutions (NWS) or Non-Pipes Solutions (NPS) can meet system needs more cost-effectively than traditional physical infrastructure upgrades, particularly during peak periods. If successful, **this process should defer utility-owned capital investments and deliver direct savings to customers.**

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**. Currently, Rhode Island Energy identifies opportunities for system reliability procurements with limited input from or coordination with third-party developers and other external partners, which appears to have led to the identification of few or low-quality opportunities for possible NWS and NPS. This would be particularly valuable in evaluating whether adequate market interest exists in advance of putting out an RFP.

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**

¹ The utility's demand response program, ConnectedSolutions, while part of the SRP investment proposal, does not serve to avoid a specific distribution investment.

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.

Additionally, the SRP process as a whole suffers from a lack of tangible goals. Without targets, the impetus to successfully implement third-party NWS and NPS is limited. Acadia Center recommends implementing **targets** for both demand reduction and third-party contributions to that demand reduction, with these targets ramping up over time.

Acadia Center supports a more strategic approach to SRP as outlined by the Energy Efficiency Council in their draft 2027-2029 Energy Efficiency (EE) and System Reliability Plan (SRP) priorities:

- Identifies specific system needs and constraints and matches them with appropriately designed demand-side solutions
- Prioritizes customer segments, technologies, and locations that provide the greatest system value
- Leverages available data, including AMI and system planning information, to inform targeting and program design

Demand-side resources must play an increasing role in maintaining system reliability and managing long-term costs. But without changes targeted at engaging providers of demand-side resources early, Rhode Island Energy risks another three-year plan cycle passing without any successful projects. To maximize value holistically, demand-side resources should be coordinated across the gas and electric systems, and specific targets should be put in place to reframe the SRP as affirmatively goal-oriented.

Thank you for your consideration.

Sincerely,

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