



December 2, 2022

Ms. Luly Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket No. 22-40-EE: Pascoag Utility District – 2023 Demand Side Management Plan

Dear Commissioners:

The Rhode Island Office of Energy Resources (OER) respectfully submits these comments in support of Pascoag Utility District's (PUD) 2023 Demand Side Management Plan (2023 DSM Plan or Plan) that was filed with the Public Utilities Commission (Commission) on November 7, 2022 under Docket No. 22-40-EE.

PUD's proposed 2023 DSM Plan continues their ongoing investment in providing important energy saving measures and education to their customers. PUD recognizes the value provided to their customers through the DSM Program and has proposed, for the first time, increasing their system benefit charge (SBC) in the 2023 DSM Plan to maintain robust support for critical efficiency investments. This increased revenue, in combination with Regional Greenhouse Gas Initiative (RGGI) funds from OER, is expected to result in substantial cost-effective energy and demand savings, while contributing to PUD's ability to deliver clean, affordable, and reliable energy to local customers. OER commends PUD on its continued commitment to supporting a strong DSM Program and strongly supports this modest increase to the SBC to ensure a sustainable and robust DSM Program long into the future.

The 2023 DSM Plan showcases PUD's continued commitment to delivering high quality, effective energy efficiency measures. The Plan provides robust support for foundational energy efficiency measures such as home energy audits and weatherization that deliver both immediate and long-lasting energy savings to customers, while also serving as an important entry point on a customer's energy investment journey. PUD's continuous investment in these core programmatic areas has helped develop a robust pipeline of projects and spurred demand for these opportunities to deliver critical energy savings. Indeed, in a customer survey about the DSM Program offerings, the response was overwhelmingly positive in support of the current residential weatherization program as well as PUD's important participation in community engagement activities.



OER believes that PUD's ongoing investment in both home energy audits and weatherization measures and continuous engagement throughout the community have fostered a strong understanding of the importance of energy efficiency and a trust in them as a partner to help customers on their energy improvement journey. Having a trusted partner to help deliver these energy and bill savings to customers, especially the most vulnerable, is even more critical as energy prices continue to rise and the economy continues to experience the pains of inflation.

The 2023 Plan also continues their support of the business community in Pascoag and there are a number of planned projects for 2023 that will extend the benefits of energy efficiency to key commercial constituents as well. Additionally, OER is working alongside PUD and the Burrillville Schools staff to develop a plan for the implementation of LED Lighting at Burrillville High School, which upon completion will have the entire district illuminated by LED lighting. We are hopeful that this project will be completed in 2023.

OER has been collaborating with PUD on its DSM Program since 2018 and directed multiple RGGI allocations to support the growth and development of this program. The strategies developed at the outset of our collaboration, and included in Schedule H, have largely been executed and have resulted in significant growth and adoption of the DSM Program across PUD territory. OER also commends PUD on its efforts to align their activities and DSM Program with broader State energy policy and goals including, but not limited to, the 2021 Act on Climate and support for our clean energy economy. The 2023 DSM Plan is no exception to this commitment, and we are excited to continue our collaboration with PUD.

We are confident that PUD residents and businesses will realize substantial energy, economic, and environmental benefits as a result of the programs advanced through the 2023 DSM Plan, and respectfully request that the Commission approve the Plan as filed.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Chris Kearns".

Chris Kearns
Acting Commissioner