

PUC 1-1

Request:

Rhode Island Energy recommends the filing deadline for annual reports be pushed back from May 1 to June 1 (see RIE Comment #9). Will the later filing deadline for annual reports impact your ability to participate in developing or reviewing Energy Efficiency Plans? Please describe.

Response:

A later filing deadline for Rhode Island Energy's annual reports would impact the Council's ability to participate in the development and review of the Energy Efficiency Plans. A key component of the Council's ability to effectively participate in plan development is a full understanding of the previous years' results. Efforts to provide input for upcoming energy efficiency plans are typically well underway by June 1st, and we feel that this changed deadline would further compress an already tight plan development schedule.

Beyond the Council's ability to participate in developing or reviewing energy efficiency plans, pushing the filing date back would also impact the ability of the Council to deliver on its statutorily required annual report on its activities to the General Assembly. Because a core component of the Council's annual report is derived from information on Rhode Island Energy's program activity and performance, having Rhode Island Energy's annual report to the PUC completed in a timely manner is important. According to R.I. Gen. Laws § 42-140.1-5, the Council must submit its report on or before April 15th of each year. Current practice is for the Council to notify the General Assembly that its annual report will be delayed by about a month for the reasons stated above, and while the Council could continue this practice by extending the notification of delay out to two months, it would certainly prefer to not do so. It is also a potential concern that, as the Legislature is nearing the end of its session in early June, the delay to the EERMC's Annual Report may render this important transparency activity less timely and therefore less impactful.

The EERMC would prefer the filing date for Rhode Island Energy's annual report remain as May 1st, noting that a request for an extension can be made if there is just reasoning for why that date can't be met in the future.

PUC 1-2

Request:

Comment CJ8 from the EERMC suggests that the Commission's proposal to require the filing of measure-level tables (proposed in Section 3.4.B.v of the Standards) clarify whether the requested savings data refers to net savings, gross savings, or both. The Commission's expectation was net savings, as those are the savings values claimed by the Company. Does the EERMC believe the proposed measure-level tables provide gross savings, net savings, or both?

Response:

The EERMC agrees with the Commission's expectations that the savings data included in the proposed measure-level tables should be on a net-savings basis. Though not critical, it may be worth noting this explicitly, either in-line or in the definitions section (e.g., 'Savings' are assumed to be net annual energy savings throughout the standards unless otherwise specified).

PUC 1-3

Request:

The EERMC proposes a new Section 6.4 to “appropriately note the Council’s role in development and approval of any DSM plans.” Comment CJ13 suggests that the proposed language “is similar to the Section 6.3 on SRP.” Is the proposed language for Section 6.4 the same as the existing language in Section 6.3, just updated to refer to DSM not SRP? If no, explain any differences between the existing language in Section 6.3 and the proposed language for Section 6.4.

Response:

The newly proposed language in Section 6.4 is the exact language that already exists in Section 6.3, just updated to refer to DSM instead of SRP with a few minor exceptions noted below:

- **Section B:** Changed “annual” to “any” in the first sentence of Section B. Section 7.3.F notes that “DSM proposals will include an annual reporting plan on the implementation of the DSM Proposal over the stated delivery period.” Because an annual reporting plan could include the potential for more frequent reporting, the Council wanted to ensure that it would have the opportunity to provide input on any reports contemplated by an annual reporting plan.
- **Section C:** Changed “by October 21, 2020 and triennially thereafter” to “prior to the prescribed filing date” to account for uncertainty in when DSM programs may be filed.
- **Section F:** Removed “pursuant to R.I. Gen. Laws §39-1-27.7(c)(5)” to acknowledge that that statute applies to SRP and LCP and not directly to DSM.

Lastly, the Council notes that Chapter 7 of the standards is actively under review and will likely be subject to further discussion and possible modification as this docket progresses. The Council suggests that, due to that fact, the precise language of section 6.4 should be finalized once the content of Chapter 7 itself is final.