



STATE OF RHODE ISLAND  
**OFFICE OF  
ENERGY RESOURCES**

*One Capitol Hill, 4<sup>th</sup> Floor  
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May 24, 2023

Chairperson Ronald T. Gerwatowski  
Commissioner Abigail Anthony  
Commissioner John C. Revens, Jr.  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

Re: Docket 23-15-EE – Block Island Utility District 2023 Demand Side Management Plan

Dear Commissioners:

The Rhode Island Office of Energy Resources (OER) respectfully submits these comments in support of Block Island Utility District's (BIUD or District) 2023 Demand Side Management Plan (2023 Plan) that was filed with the Commission on April 24, 2023 under Docket 23-15-EE, and finds it consistent with the spirit and intent of the 2021 Act on Climate.

BIUD's proposed 2023 Plan builds on the work of prior approved DSM plans and incorporates important lessons learned from their implementation. The 2023 Plan includes refinements to program administration, clarifies and adjusts efficiency incentives, and proposes strategies to support customer engagement and follow on measures. Taken together, OER believes these adjustments will continue to encourage customer investments in cost-effective energy efficiency measures and manage local customer energy costs. Moreover, these refinements will work to further improve consistency with state energy policy goals and BIUD's mission.

The 2023 Plan attempts to right-size program targets and budgets, bringing the aspirational energy savings targets of prior plans in line with what is achievable based on past performance, current logistical challenges, and the proposed enhancements to customer engagement strategies. The incentive levels for some offerings have been adjusted to align with other efficiency programs while others have been clarified to make these offerings easier for customers to understand. In order to further improve uptake for the plan, BIUD is committing to more in-person engagement as this has proven to be a big driver of program activity in the past, giving customers the opportunity to directly engage with program staff to learn how they can best take advantage of these offerings.



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BIUD's proposal also includes streamlined program management for the 2023 Plan through the consolidation of administration and implementation functions under a single vendor, Energy New England (ENE). This opportunity to deepen the synergy in plan facilitation should help to

improve program performance, communication, and reporting, as well as increase the effectiveness of the new strategies which the plan will pursue to address challenges faced in prior plan years.

A principal challenge to additional program uptake has been the availability and interest of contractors to perform weatherization and other efficiency services on the island. This continues to make implementation of recommended efficiency measures difficult for customers who have received home energy assessments. The 2023 Plan will implement a cohort model to help facilitate customers obtaining quotes for weatherization and heat-pump installation while also building relationships with contractors to service the growing pipeline of work available on Block Island. This model will help close the loop on the program offerings, creating consistently attractive project bundles for contractors, which will improve uptake and satisfaction with the program as customers gain confidence in their ability to have these proposed measures implemented.

OER remains supportive of BIUD's DSM plan and our collaboration with them to bring cost-effective energy efficiency offerings to their customers. We believe the proposed adjustments to the 2023 Plan make meaningful improvement to the offerings for BIUD customers, reflect realistic targets, and attempt to address historic program challenges to growth. The BIUD DSM Plan, as proposed, will deliver important energy, environmental, and economic benefits to the District's customers and is in alignment with Act on Climate goals and objectives.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Christopher Kearns". The signature is fluid and cursive.

Christopher Kearns  
Acting Commissioner