

McElroy & Donaldson

Michael R. McElroy
Leah J. Donaldson

Attorneys at Law

Michael@McElroyLawOffice.com
Leah@McElroyLawOffice.com

Members of the Rhode Island
and Massachusetts Bars

Office: 21 Dryden Lane
Providence, RI 02904
Mail: 3 Cedar Meadows Drive
Smithfield, RI 02917

(401) 351-4100
fax (401) 421-5696

June 9, 2023

Luly E. Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: Block Island Utility District d/b/a Block Island Power Company
Demand Side Management 2023**

Dear Luly,

As you know, our office represents Block Island Utility District (“BIUD”).

Enclosed for filing please find an original and five (5) copies of BIUD’s Responses to DR 2 and 3 of the Commissions First Set of Data Requests to BIUD.

If you need any further information, please do not hesitate to contact me.

Very truly yours,



Leah J. Donaldson

Cc: Service List for PUC 5244 (via electronic mail)

**Docket No. 5244 – Block Island Utility District - Demand Side Mgmt.
Service List as of 3/31/2022**

Name/Address	Email	Phone
Block Island Utility District (BIUD) Michael McElroy, Esq. Leah J. Donaldson, Esq. McElroy & Donaldson 3 Cedar Meadows Drive Smithfield, RI 02917	Michael@McElroyLawOffice.com;	401-351-4100
	leah@mcelroylawoffice.com;	
David Bebyn	dbebyn@beconsulting.biz;	
Katherine Johnson	kjohnson@johnsonconsults.com;	
Jake Millette	JBMillette@michaelsenergy.com;	
Jeffery Wright, President Barbara MacMullan	jwright@blockislandutilitydistrict.com;	401-466-5851
	bamacmullan@gmail.com;	
Division of Public Utilities (Division) Mark A. Simpkins, Esq.	Mark.A.Simpkins@dpuc.ri.gov;	401-274-4400 Ext. 2425
	Margaret.L.Hogan@dpuc.ri.gov;	
	Christy.Hetherington@dpuc.ri.gov;	
	egolde@riag.ri.gov;	
John Bell, Chief Accountant	John.bell@dpuc.ri.gov;	
	Joel.munoz@dpuc.ri.gov;	
File an original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Cynthia Wilson Frias, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov;	
	Christopher.M.Smith@puc.ri.gov;	
	Alan.nault@puc.ri.gov;	
	emma.rodvien@puc.ri.gov;	
Interested Persons		
Nick Ucci, OER	Nicholas.Ucci@energy.ri.gov;	401-574-9104
	Carrie.Gill@energy.ri.gov;	
	Nathan.Cleveland@energy.ri.gov;	
Al Vitali, Esq., OER	Albert.Vitali@doa.ri.gov;	401-222-8880
	nancy.russolino@doa.ri.gov;	
Kathleen Merolla, Esq.	KAMLAW2344@aol.com;	
Maryanne Crawford, Town Manager Town of New Shoreham	mcrawford@new-shoreham.com;	

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: BLOCK ISLAND UTILITY DISTRICT
2023 DEMAND SIDE MANAGEMENT PLAN**

: DKT 23-15-EE

**BLOCK ISLAND UTILITY DISTRICT'S RESPONSES TO
COMMISSION'S FIRST SET OF DATA REQUESTS**

Issued June 2, 2023

2. Mr. Jeffrey M. Wright states on page 3, lines 24-25, "*Member Outreach: all outreach efforts were done at no expense. They included 25 annual meeting demos, community bulletin board posts, and word of mouth.*" Referencing the Proposed Budget for Demand Side Management Plan, section A lists a \$2,000 budget item for "Outreach and Education."

Does BIUD use the terms "*Member Outreach*" and "*Outreach and Education*" interchangeably? Please define the terms and provide clarification and/or distinctions for each if necessary. Please reconcile the two statements and indicate whether there will be any expense associated with outreach and education.

RESPONSE:

The terms 'Member Outreach' and 'Outreach and Education' have been used interchangeably in the 2023 DSM Plan.

We do not plan to spend any funds on outreach as there are more effective communication methods at no cost. We will adjust the budget accordingly.

Prepared by: Jeffery M. Wright

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: BLOCK ISLAND UTILITY DISTRICT
2023 DEMAND SIDE MANAGEMENT PLAN**

: DKT 23-15-EE

**BLOCK ISLAND UTILITY DISTRICT'S RESPONSES TO
COMMISSION'S FIRST SET OF DATA REQUESTS**

Issued June 2, 2023

3. As mentioned in Mr. Jeffrey M. Wright's, April 22, 2023 written testimony, specifically on page 5, lines 1-9 and highlighted throughout the Demand Side Management 2023 Plan, it clearly remains a challenge to preform audits and installations due to ongoing staffing issues and interest/engagement.

Have alterative plans been considered to fully disburse BIUD program funds regardless of customer interest? For example, has BIUD considered upgrades to municipal buildings (i.e., the school, town hall, or library) such as energy efficient HVAC systems or windows or weatherization?

RESPONSE:

We have not considered other expenses for the 2023 Plan besides what is included in our proposed program budget.

Prepared by: Jeffery M. Wright