



STATE OF RHODE ISLAND

**OFFICE OF  
ENERGY RESOURCES**

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July 14, 2023

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

To the Rhode Island Public Utilities Commission,

The Rhode Island Office of Energy Resources (OER) submits these comments regarding the updated version of the Least-Cost Procurement (LCP) Standards released by the Commission for public comment on July 7, 2023.

OER appreciates the effort of the Commission and staff to host the technical session and review input from stakeholders to inform a workable standard amid the evolving landscape for investment in our energy and efficiency systems. The refinements and additions to the LCP Standards, including clarity on measurement and reporting criteria and categories of investment, will improve program development and accountability. These changes should offer stakeholders greater clarity and guidance in making prudent, equitable, and advantageous programs for the benefit of Rhode Island consumers and businesses. Additionally, the inclusion of the new Chapter 7 covering Demand Side Management is a welcome pathway to increase the scope, variety, and directionality of investments. Every additional means to further accelerate Rhode Island's ability to respond to a shifting energy system, advance equitable access to the benefits of that shift, and meet the challenges of climate change is encouraged.

The changes within the standard to increase consideration and require reference to equity and equitable access are encouraging. Furthermore, OER appreciates the Commission's position on inclusion of a definition of equity in the Standards, and the difficulty the Commission has identified in measuring and effectuating alignment with those definitions in potential spending proposals under the standard. OER will continue to explore how the language in the Act on Climate can be operationalized to create measurable criteria that appropriately values equity and equitability and informs consideration and analysis of plans submitted under the LCP. We look forward to continuing to work with the Commission and all other stakeholders to refine and incorporate those criteria in the future.

Sincerely,

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

Chris Kearns  
Acting Commissioner