

RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 23-35-EE

**The Narragansett Electric Co. d/b/a Rhode Island Energy's 2024-2026 Energy
Efficiency Three-Year Plan and Annual Energy Efficiency Plan for 2024**

DIVISION OF PUBLIC UTILITIES & CARRIERS

**JOINT PRE-FILED DIRECT TESTIMONY
OF
JOEL MUNOZ AND JENNIFER KALLAY**

November 10, 2023

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Exhibit JK -1: Resume of Jennifer Kallay

I. INTRODUCTION

Joel Munoz

Q. MR. MUNOZ, PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Joel Munoz. My business address is 89 Jefferson Boulevard, Warwick, Rhode Island 02888.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am employed by the Rhode Island Division of Public Utilities and Carriers (Division). I am a Rate Analyst assigned to energy efficiency related filings.

Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL BACKGROUND.

A. I received a Bachelor of Arts in History, as well as a Master of History Degree from Providence College. I received a Juris Doctorate from Suffolk University School of Law. Prior to joining the Division, I worked for the Law Offices of Edward G. Lawson, the City of Pawtucket, Legal Department, and the Rhode Island Attorney General's Office, Civil Division.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE RHODE ISLAND PUBLIC UTILITIES COMMISSION?

A. Yes, I have testified before the Rhode Island Public Utilities Commission (Commission) in energy efficiency related matters. Most recently, I testified before the Commission in the 2023 Annual Energy Efficiency Plan in Docket 22-33-EE, as well as, in the previously

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1 filed Three-Year Plan, the 2021-2023 EE Plan, and the 2021 Annual EE Plan in Docket
2 5076 and the 2022 Annual EE Plan in Docket 5189.

3 **Jennifer Kallay**

4 **Q. MS. KALLAY, PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

5 A. My name is Jennifer Kallay. My business address is 485 Massachusetts Avenue,
6 Cambridge, Massachusetts, 02139. I am employed by Synapse Energy Economics, Inc.
7 (Synapse) as a Principal Associate.

8 **Q. PLEASE DESCRIBE SYNAPSE ENERGY ECONOMICS.**

9 A. Synapse Energy Economics is a research and consulting firm specializing in electricity and
10 gas industry regulation, planning, and analysis. Our work covers a range of issues,
11 including economic and technical assessments of demand-side and supply-side energy
12 resources; energy efficiency policies and programs; power sector transformation;
13 integrated resource planning; electricity market modeling and assessment; renewable
14 resource technologies and policies; and climate change strategies. Synapse works for a
15 wide range of clients, including state attorneys general, offices of consumer advocates,
16 trade associations, public utility commissions, environmental advocates, the U.S.
17 Environmental Protection Agency, U.S. Department of Energy, U.S. Department of
18 Justice, the Federal Trade Commission, and the National Association of Regulatory Utility
19 Commissioners. Synapse has over 40 professional staff with extensive experience in the
20 electricity industry.

1 **Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL**
2 **BACKGROUND.**

3 A. I have 15 years of professional experience analyzing the benefits and costs of energy
4 efficiency efforts for jurisdictions in the United States and Canada including
5 Massachusetts, Rhode Island, Hawaii, Vermont, New Jersey, Arkansas, Minnesota,
6 Virginia, Prince Edward's Island, Ontario, New Mexico, Alberta, and Nova Scotia. Since
7 2012, I have supported the Division in assessing the impacts of utility energy efficiency
8 plans and delivery strategies on customers. My work entails reviewing different regulatory
9 approaches to spur energy efficiency; assessing the ability of utility energy efficiency plans
10 to tap into cost-effective potential; researching best practice program designs and policies;
11 understanding and accounting for the full benefits of energy efficiency; and conducting
12 rate and bill impact, participant, and cost-effectiveness analyses. I received a Bachelor of
13 Arts in Journalism from the University of Maryland and a Master of Energy and
14 Environmental Analysis Degree from Boston University. My resume is attached as Exhibit
15 JK-1.

16 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE RHODE ISLAND PUBLIC**
17 **UTILITIES COMMISSION?**

18 A. Yes, I have testified before the Commission in energy efficiency related matters. Most
19 recently, I testified before the Commission in the 2023 Annual EE Plan in Docket 22-33-
20 EE, as well as in the previously filed 2021-2023 Three-Year EE Plan and the 2021 Annual
21 EE Plan in Docket 5076 and the 2022 Annual EE Plan in Docket 5189.

II. PURPOSE OF THIS TESTIMONY

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?

A. We are testifying on behalf of the Division of Public Utilities and Carriers.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The Division, as Rhode Island's Ratepayer Advocate, is an indispensable party in all Commission proceedings. The Division serves the Commission, through discovery and evidentiary hearings, by providing the Commission with recommendations that favor ratepayers. The purpose of this testimony is to provide a review of some key elements of the filed plan for the Commission's deliberations. The Division reviewed the Narragansett Electric Company d/b/a Rhode Island Energy's (RIE or the Company) 2024-2026 Energy Efficiency Three-Year Plan (*2024-2026 EE Plan*) and the 2024 Annual Energy Efficiency Plan (*2024 EE Plan*), filed on October 2, 2023, collectively referred to herein as the *EE Plans*, to ensure: (1) compliance with R.I. Gen. Laws § 39-1-27.1 (the Least Cost Procurement Statute); (2) adherence to the newly adopted PUC's Least Cost Procurement (LCP) Standards adopted in Docket No. 23-07-EE; (3) advancement of the State of Rhode Island's energy policies and the goals of R.I. Gen. Laws § 42-6.2-2 (the Act on Climate); and (4) promotion of the general interest and welfare of Rhode Island ratepayers. The Division hired Synapse as its expert consultant to assist in its review of RIE's *EE Plans*.

1 **Q. WHAT IS THE ROLE OF THE DIVISION OF PUBLIC UTILITIES AND**
2 **CARRIERS IN THE DEVELOPMENT OF THE *EE PLANS*?**

3 A. The Division monitors the plans on a year-round basis by: (1) observing monthly
4 Technical Working Group (TWG) meetings; (2) monitoring and reviewing presentations
5 and documents shared at the TWG meetings; (3) examining programs and conducting
6 informal data requests; (4) reviewing EE Quarterly Reports issued by the Company; (5)
7 attending Quarterly Best Practices meetings with the Company, its EE vendors, and the
8 CAP agencies; (6) reviewing drafts of the proposed *EE Plans* and commenting, as
9 necessary; and (7) reviewing the *EE Plans*, as filed, for consistency with the LCP Statute,
10 the LCP Standards, the Act on Climate, and to ensure that the *EE Plans* are in the general
11 best interest for Rhode Island ratepayers.

12 **III. SUMMARY OF KEY ELEMENTS AND CONCLUSIONS OF THE *EE PLANS***

13 **Q. PLEASE SUMMARIZE THE KEY ELEMENTS OF THE *EE PLANS*.**

14 A. The key elements of the *EE Plans* are as follows:

- 15 • The *EE Plans* represent the first three-year plan and the third annual plan
16 since the state passed the Act on Climate in 2021, and the second annual
17 plan since the state passed the 100 percent Renewable Energy Standard by
18 2033 in 2022.
- 19 • The *EE Plans* will avoid roughly 58,000, 59,500, and 60,700 short tons of
20 carbon in 2024, 2025, and 2026, representing less than 1 percent of the goal

1 of 45 percent emissions reductions by 2030.¹ There is currently no specific
2 emissions reduction target that the Company is required to achieve to
3 support the state in reaching its Act on Climate goals.

- 4 • The *EE Plans* reflect updates to the LCP Standards. Specifically, the
5 Company updated its benefits, benefit-cost ratio, and cost of supply
6 calculations to include another scenario with only Rhode Island intrastate
7 benefits. Also, the previously included demand response programs
8 (ConnectedSolutions) are no longer incorporated in the *EE Plans* and will
9 be filed separately with the Commission.
- 10 • The Company anticipates further changes to the 2025 and 2026 Annual
11 Plans resulting from the complete rollout of new federal incentives from
12 the Inflation Reduction Act (IRA) and the American Rescue Plan Act
13 (ARPA). The Company commits to providing updates in an updated filing
14 by June 30, 2024, and in the 2025 and 2026 Annual Plans.^{2,3}
- 15 • The proposed electric budgets in the *EE Plans* are higher than the previously
16 approved 2023 EE Plan electric budget in all years if the demand response
17 program budgets are removed from the 2023 EE Plan. The electric portfolio
18 budget would have been \$94.8 million had the demand response programs

¹ *EE Plans*. Bates Page 100. Sum of the Annual Carbon Reduction (Short Tons) in each year of the plan in Table 1 and Table 2. The Division is awaiting a response to Division 3-1 which asks about a potential inconsistency in the reporting of carbon emission reductions in the *EE Plans*. This data may change pending the Company's response.

² *EE Plans*. Bates Page 19.

³ Response to Division 2-7.

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1 been removed in the *2023 EE Plan*. Budgets for Non-Income Eligible
2 Residential and Commercial & Industrial sectors rise over the three years,
3 while the budgets for the Income Eligible Residential sector decline.

- 4 • The proposed 2024 gas portfolio budget is decreasing from \$36.9 million in
5 2023 to \$34.2 million, a decrease of \$2.8 million dollars or 7 percent.
6 Budgets rise from 2024 to 2026 for the gas portfolio but remain below 2023.
7 Budgets for the Non-Income Eligible Residential and Commercial &
8 Industrial sectors rise over the three years, while the budgets for the Income
9 Eligible Residential sector increase from 2024 to 2025 and then decline
10 slightly from 2025 to 2026.⁴

11 **Q. PLEASE SUMMARIZE THE DIVISION'S CONCLUSIONS ON THE *EE PLANS*.**

12 **A. The Division concludes the following regarding the *EE Plans*:**

- 13 • There is no specific emissions reduction target currently that the Company
14 is required to meet in order to support the Act on Climate goals. The
15 Division considers emissions reduction of the magnitude contemplated in
16 the *EE Plans* to be supportive of the Act on Climate and helpful in meeting
17 the state's climate goals.

⁴ This finding remains valid with 2026 gas portfolio budget updates provided in the Company's response to Division 2-15.

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- 1 • The *EE Plans* are consistent with the LCP Statute and Standards and are
2 cost effective with a benefit cost ratio greater than 1.0 for the electric and
3 gas portfolios and costs that are lower than the cost of additional supply.

- 4 • The Division notes that the *EE Plans* remain uncertain regarding how to
5 incorporate federal funding, specifically funding from the IRA and the
6 ARPA, into the plans. The Division asserts that updates are needed to
7 incorporate new federal incentives into the 2025 and 2026 plan years. Due
8 to the likelihood that the 2025 and 2026 *EE Plans* will differ from what is
9 presented in the 2024-2026 *EE Plan*, the Division focuses mostly on the
10 2024 *EE Plan* in its conclusions.

- 11 • The Division appreciates the initiation of a shift away from gas heating
12 equipment and towards weatherization and heat pump investments in the
13 *EE Plans*. There is a decline in gas budgets in 2024, relative to 2023. The
14 Division is concerned that the gas portfolio budgets increase in 2025 and
15 2026 when there should be a general shifting away from gas measures. The
16 Division looks forward to further discussion regarding the plan for 2025 and
17 2026.

- 18 • The EE Report for the third quarter of 2023 shows that only 38 percent of
19 the electric budget and 35 percent of the gas budget was spent through
20 September 30, 2023. The Division is concerned that the projected year-end
21 balance included in the filing and used as a funding source for the

1 calculation of the 2024 System Benefits Charge (SBC) factor may be
2 understated, which results in higher SBC charges than necessary.

- 3 • Responses to Division discovery questions identify two potential areas of
4 data development to support future energy efficiency efforts. First, the
5 Company's response to Division 1-1 suggests that the Company does not
6 currently know which customers and businesses have electric heat. Second,
7 the Company's response to Division 1-11 suggests that the Company does
8 not currently know which customers reside in a Justice40 community.

9 **Q. PLEASE SUMMARIZE THE DIVISION'S RECOMMENDATIONS.**

10 **A.** The Division recommends:

- 11 • That the Commission find that the *EE Plans* are consistent with the LCP Statute
12 and Standards.
- 13 • That the Commission find that the *EE Plans* support the goals of the Act on
14 Climate.
- 15 • That the Commission use the best and most updated information, by the time of
16 the hearings in December, regarding the Company's projected spends for both the
17 electric and gas portfolios, as well as the Year-End Balance projection to make a
18 final recommendation regarding the appropriate SBC to support the *2024 Annual*
19 *Plan*.

- 1 • Further discussion and exploration to advance data tracking related to the
2 Act on Climate and the Justice40 Initiative as new sources of funding may
3 require improvements to reporting. Specifically, the Division is interested
4 in understanding the heating fuel used by RIE's customers and which of
5 its customers reside in a Justice40 community.

6 **IV. ACT ON CLIMATE**

7 **Q. DO THE *EE PLANS* SUPPORT EFFORTS TO ADDRESS CLIMATE ISSUES IN**
8 **THE STATE?**

9 A. Energy efficiency is recognized as a cost-effective way to reduce energy consumption, save
10 ratepayers money on their energy bills, and provide societal and environmental benefits
11 that help achieve the state's energy policy goals. Energy Efficiency is also an essential tool
12 in reaching the ambitious and accelerated greenhouse gas emissions reduction goals set out
13 in the Act on Climate. The Company projects an avoidance of approximately 58,000,
14 59,500, and 60,700 short tons of carbon in 2024, 2025, and 2026, respectively.⁵ This
15 reduction represents less than 1 percent of the goal of 45 percent emissions reduction by
16 2030.⁶ Considering there is no specific emissions reduction target that the Company is
17 currently required to meet to support the Act on Climate goals, the above projections of

⁵ *EE Plans*. Bates Page 100. Sum of the Annual Carbon Reduction (Short Tons) in each year of the plan in Table 1 and Table 2. The Division is awaiting a response to Division 3-1 which asks about a potential inconsistency in the reporting of carbon emission reductions in the *EE Plans*. This data may change pending the Company's response.

⁶ *EE Plans*. Bates Page 47.

1 avoided emissions is sufficient for the Division to find that the *EE Plans* support the Act
2 on Climate.

3 **Q. DOES THE DIVISION OFFER ANY OBSERVATIONS RELATIVE TO THE *EE***
4 ***PLANS* EFFORTS TO ADDRESS CLIMATE ISSUES IN THE STATE?**

5 A. The Company is currently working with the Office of Energy Resources (OER) to discuss
6 the most efficient way to synergize programs in the *EE Plans* that contribute to Act on
7 Climate goals with federal funding, including OER's administration of \$64 million from
8 the IRA and \$25 million from the ARPA. The rules and guidelines for the federal funding
9 were recently issued by the federal government and the monies will not be issued to OER
10 until Quarter 4 of 2024. Therefore, definitive and vetted synergies between the plans and
11 federal funding are not present in 2024 and are speculative, at best, in 2025 and 2026. In
12 addition, the Company has begun to take steps to revamp its gas efficiency portfolio to
13 shift funds away from natural gas-consuming equipment and towards electric alternatives
14 and measures. The Division supports this approach as consistent with the Act on Climate
15 goals.

16 **V. COST-EFFECTIVENESS**

17 **Q. PLEASE SUMMARIZE THE COST-EFFECTIVENESS OF THE *2024-2026 EE***
18 ***PLAN* PROPOSED BY THE COMPANY BASED UPON THE RI TEST BENEFIT-**
19 **COST RATIOS.**

20 A. Table 1 below shows the electric RI Test benefit-cost ratios by sector and overall, for the
21 approved 2023 EE Plan as compared to the Company's proposed EE Plan for 2024, 2025,

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1 and 2026. The 2024-2026 Electric EE Plan is cost-effective at the sector and portfolio
2 levels in all years. The reason the 2024, 2025, and 2026 electric portfolio is less cost-
3 effective than in 2023 is that only the intrastate benefits are counted in 2024, 2025, 2026
4 according to the Company's application of the updated LCP Standards. Absent this
5 adjustment, the 2024, 2025, and 2026 electric portfolio is more cost-effective than 2023.

6 **Table 1. Electric RI Test Benefit-Cost Ratios**

Electric RI Test BCRs	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Non-Income Eligible Residential	1.71	1.48	1.48	1.45
Income Eligible Residential	1.66	1.32	1.48	1.50
Commercial & Industrial	1.91	1.65	1.69	1.74
Total	1.70	1.46	1.50	1.52

Sources:

1) 2024-2026 Plan from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule A, Attachment 2, Bates Pages 121, 123, and 125.

2) 2023 Plan from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 5, Table E-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

8 Table 2 below shows the gas RI Test benefit-cost ratios by sector and overall, for the
9 approved 2023 EE Plan as compared to the Company's proposed EE Plan for 2024, 2025,
10 and 2026. The 2024-2026 Gas EE Plan is cost-effective at the sector and portfolio levels
11 in all years, including only intrastate benefits. Absent this adjustment, the 2024, 2025, and
12 2026 electric portfolio remains less cost-effective than 2023.

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Table 2. Gas RI Test Benefit-Cost Ratios

Gas RI Test BCRs	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Non-Income Eligible Residential	1.42	1.34	1.31	1.30
Income Eligible Residential	2.31	2.22	2.17	2.29
Commercial & Industrial	3.28	3.02	3.04	3.05
Total	2.06	1.95	1.95	1.99

Sources:

1) 2024-2026 Plan from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule A, Attachment 2, Bates Pages 127, 129, and 131.

2) 2023 Plan from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 6, Table G-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

Table 3 shows the change in RI Test benefits and costs for 2024 versus 2023 for the electric portfolio, accounting for intrastate benefits only in 2024. Electric portfolio costs decreased by \$7.9 million from 2023 to 2024, due to decreases in program implementation costs and customer contributions. The performance incentive increased from 2023 to 2024. Electric portfolio benefits decreased by \$25.1 million, driven by decreases in transmission and electric energy DRIPE (which are the categories impacted by the adjustments for intrastate benefits) and carbon benefits.

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Table 3. Electric RI Test Benefits and Costs

Electric RI Test Benefits and Costs		2023		2024		Difference (2024 vs. 2023)	
		\$000	% Distribution	\$000	% Distribution	\$000	% Distribution
Capacity	Summer Generation	\$ 4,542	2%	\$ 4,678	3%	\$ 136	0%
	Capacity DRIPE	\$ 9,203	5%	\$ 6,933	4%	\$ (2,270)	-1%
	Transmission	\$ 10,321	5%	\$ 1,061	1%	\$ (9,260)	-5%
	Distribution	\$ 11,713	6%	\$ 15,564	9%	\$ 3,851	3%
	Reliability	\$ 161	0%	\$ 139	0%	\$ (22)	0%
Electric Energy	Winter Peak	\$ 15,802	8%	\$ 18,863	11%	\$ 3,061	3%
	Winter Off Peak	\$ 13,623	7%	\$ 16,873	10%	\$ 3,250	3%
	Summer Peak	\$ 9,036	5%	\$ 9,524	6%	\$ 488	1%
	Summer Off Peak	\$ 6,309	3%	\$ 6,503	4%	\$ 194	1%
	Electric Energy DRIPE	\$ 18,063	9%	\$ 1,699	1%	\$ (16,364)	-8%
Non-Electric Benefits	Natural Gas	\$ (671)	0%	\$ (549)	0%	\$ 122	0%
	Oil	\$ 20,968	11%	\$ 18,061	11%	\$ (2,907)	0%
	Other-Resource	\$ 3,711	2%	\$ 4,807	3%	\$ 1,096	1%
	Non-Resource	\$ 29,066	15%	\$ 30,954	19%	\$ 1,888	3%
Societal	Carbon Benefits	\$ 38,056	20%	\$ 30,036	18%	\$ (8,020)	-2%
	Nox Benefits	\$ 1,420	1%	\$ 1,082	1%	\$ (338)	0%
Total Benefits (excluding Econ)		\$ 191,323	100%	\$ 166,228	100%	\$ (25,095)	0%
Program Implementation		\$ 99,073	81%	\$ 92,229	81%	\$ (6,844)	0%
Customer Contribution		\$ 19,223	16%	\$ 17,496	15%	\$ (1,727)	0%
Performance Incentive		\$ 3,359	3%	\$ 4,079	4%	\$ 720	1%
Total Costs		\$ 121,655	100%	\$ 113,804	100%	\$ (7,851)	0%

Sources:

1) 2024 Plan costs from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule B, Attachment 5, Table E-5 Primary Calculation of 2024 Program Year Cost-Effectiveness, Bates Page 404.

2) 2024 Plan benefits from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule B, Attachment 5, Table E-6B - Summary of 2024 Intrastate Energy Efficiency Benefits by Program, Bates Page 409.

3) 2023 Plan costs from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 5, Table E-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

4) 2023 Plan benefits from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 5, Table E-6 - Summary of 2023 Benefits by Program (Energy Efficiency Measures), Page 8.

Notes:

The 2023 benefits in Table E-6 do not match the benefits shown in Table E-5.

Table 4 shows the change in RI Test benefits and costs for 2024 versus 2023 for the gas portfolio, accounting for intrastate benefits only in 2024. Gas portfolio costs decreased by \$3.8 million from 2023 to 2024, due to decreases in program implementation costs and customer contributions. The performance incentive increased from 2023 to 2024. Gas portfolio benefits decreased by \$12.3 million, driven by decreases in all benefit categories.

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Table 4. Gas RI Test Benefits and Costs

Gas RI Test Benefits and Costs		2023		2024		Difference (2024 vs. 2023)	
		\$000	% Distribution	\$000	% Distribution	\$000	% Distribution
Natural Gas Benefits	Natural Gas	\$ 29,750	32%	\$ 28,604	36%	\$ (1,146)	4%
	Natural Gas DRIPE	\$ 313	0%	\$ -	0%	\$ (313)	0%
Capacity	Summer Generation	\$ 347	0%	\$ 124	0%	\$ (223)	0%
	Capacity DRIPE	\$ 808	1%	\$ 82	0%	\$ (726)	-1%
	Transmission	\$ 477	1%	\$ 19	0%	\$ (458)	0%
	Distribution	\$ 586	1%	\$ 282	0%	\$ (304)	0%
	Reliability	\$ 41	0%	\$ 1	0%	\$ (40)	0%
Electric Energy	Winter Peak	\$ 94	0%	\$ 77	0%	\$ (17)	0%
	Winter Off Peak	\$ 92	0%	\$ 89	0%	\$ (3)	0%
	Summer Peak	\$ 212	0%	\$ 92	0%	\$ (120)	0%
	Summer Off Peak	\$ 179	0%	\$ 79	0%	\$ (100)	0%
	Electric Energy DRIPE	\$ 138	0%	\$ 6	0%	\$ (132)	0%
Non-Electric and Non-Gas Benefits	Oil and Oil DRIPE	\$ -	0%	\$ -	0%	\$ -	0%
	Other-Resource	\$ 662	1%	\$ 512	1%	\$ (150)	0%
	Non-Resource	\$ 33,748	37%	\$ 27,818	35%	\$ (5,930)	-2%
Societal	Carbon Benefits	\$ 22,321	24%	\$ 19,820	25%	\$ (2,501)	1%
	Nox Benefits	\$ 2,514	3%	\$ 2,390	3%	\$ (124)	0%
Total Benefits (excluding Econ)		\$ 92,282	100%	\$ 79,995	100%	\$ (12,287)	0%
Program Implementation		\$ 36,140	81%	\$ 33,255	81%	\$ (2,885)	0%
Customer Contribution		\$ 7,852	18%	\$ 6,854	17%	\$ (997)	-1%
Performance Incentive		\$ 792	2%	\$ 905	2%	\$ 113	0%
Total Costs		\$ 44,784	100%	\$ 41,014	100%	\$ (3,769)	0%

Sources:

1) 2024 Plan costs from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule B, Attachment 6, Table G-5 Primary Calculation of 2024 Program Year Cost-Effectiveness, Bates Page 420.

2) 2024 Plan benefits from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule B, Attachment 6, Table G-6B - Summary of 2024 Intrastate Energy Efficiency Benefits by Program, Bates Page 425.

3) 2023 Plan costs from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 6, Table G-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

4) 2023 Plan benefits from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 6, Table G-6 - Summary of 2023 Benefits by Program, Page 8.

Q. PLEASE SUMMARIZE THE COST-EFFECTIVENESS OF THE 2024 EE PLAN PROPOSED BY THE COMPANY BASED UPON THE COST OF SUPPLY.

A. The 2024 electric and gas portfolios are cost-effective because the cost of the energy efficiency programs is lower than the cost of additional supply. Table 5 depicts the cost of the energy efficiency programs, cost of additional supply, and the difference between the two costs for the electric and gas portfolios in 2024. The costs of electric supply only include intrastate costs in 2024.

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Table 5. 2024 Electric and Gas Cost of Energy Efficiency Programs vs. Cost of Additional Supply

	2024 Plan
	Electric (\$000)
Cost of Electric EE Programs (\$M)	\$113.8
Cost of Electric Supply (\$M)	\$134.8
Difference (\$M, EE Programs-Supply)	(\$21.0)
	Gas (\$000)
Cost of Gas EE Programs (\$M)	\$41.0
Cost of Gas Supply (\$M)	\$51.7
Difference (\$M, EE Programs-Supply)	(\$10.7)

Source:

Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule B, Table 10 Costs of Energy Efficiency and Costs of Energy Supply, Bates Page 214.

Q. WHAT IS THE DIVISION'S POSITION ON THE COST-EFFECTIVENESS OF THE 2024-2026 EE PLAN?

A. The Division finds that the 2024-2026 EE Plan remains cost-effective, after including only intrastate impacts. The Division also finds that the Company's assessment of cost-effectiveness incorporates the updated LCP Standards.

VI. BUDGETS

Q. PLEASE SUMMARIZE THE PROPOSED BUDGETS FOR THE EE PLANS.

A. The proposed 2024, 2025, and 2026 electric budgets are higher than the 2023 electric budget, after removing the ConnectedSolutions programs budgets from the 2023 EE Plan. A more appropriate comparison reveals that the proposed electric budget is increasing from \$94.8 million ⁷ in 2023 to \$96.3 million in 2024, an increase of \$1.5 million dollars or approximately 2 percent. The proposed 2024, 2025, and 2026 gas budgets are lower than

⁷ 2023 Electric Portfolio Budget (\$102.4 million) minus the ConnectedSolutions program budgets (\$7.6 million)

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the 2023 gas budget. The proposed gas budget is decreasing from \$36.9 million in 2023 to \$34.2 million in 2024, a decrease of \$2.8 million dollars or 7 percent. For the electric and gas portfolios combined, budgets decrease from 2023 to 2024 by 1.2 million or 1 percent. Table 6 below provides this summary of electric and gas budgets:

Table 6. Summary of Electric and Gas Budgets

Budget (\$000)	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Electric	\$ 102,433	\$ 96,327	\$ 99,514	\$ 103,074
Gas	\$ 36,932	\$ 34,166	\$ 34,846	\$ 34,951
Total: Electric and Gas	\$ 139,364	\$ 130,493	\$ 134,361	\$ 138,024

Sources:

1) 2024-2026 Electric Plan from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule A, Attachment 2, Bates Pages 121, 123, and 125.

2) 2024-2026 Gas Plan from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule A, Attachment 2, Bates Pages 127, 129, and 131.

3) 2023 Electric Plan from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 5, Table E-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

4) 2023 Gas Plan from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 6, Table G-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

Table 7 provides a more detailed budget breakout for the electric portfolio. The Non-Income-Eligible Residential, Income-Eligible, Commercial & Industrial and Company Incentive components of the budget increase in 2024, relative to 2023, which drive the increase in the total 2024 budget. Investment in the Income-Eligible Residential sector declines from 2024 to 2026 while investment in the Non-Income Eligible Residential and Commercial & Industrial sectors increases.

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Table 7. Electric Budget Breakout

Electric Budget (\$000)	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Non-Income Eligible Residential	\$ 31,048	\$ 30,023	\$ 31,435	\$ 33,152
Income Eligible Residential	\$ 15,179	\$ 16,022	\$ 15,782	\$ 15,655
Commercial & Industrial	\$ 45,916	\$ 40,358	\$ 41,969	\$ 43,671
Portfolio	\$ 6,931	\$ 5,828	\$ 6,076	\$ 6,213
Company Incentive	\$ 3,359	\$ 4,097	\$ 4,253	\$ 4,382
Total Budget	\$ 102,433	\$ 96,327	\$ 99,514	\$ 103,074

Sources:

1) 2024-2026 Plan from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule A, Attachment 2, Bates Pages 121, 123, and 125.

2) 2023 Plan from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 5, Table E-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

Table 8 provides a more detailed budget breakout for the gas portfolio. Most components of the budget decline in 2024 relative to 2023 except for the Company Incentive. These decreases drive the decrease in the 2024 budget. By 2026 the total budget increases from 2024, driven by increases in investment in the Non-Income-Eligible Residential and Commercial & Industrial sectors. Investment in the Income Eligible Residential sector increases from 2024 to 2025 and then declines slightly from 2025 to 2026.⁸

⁸ This finding remains valid with 2026 gas portfolio budget updates provided in the Company's response to Division 2-15.

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Table 8. Gas Budget Breakout

Gas Budget (\$000)	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Non-Income Eligible Residential	\$ 16,090	\$ 15,102	\$ 15,390	\$ 15,492
Income Eligible Residential	\$ 8,644	\$ 7,586	\$ 7,650	\$ 7,162
Commercial & Industrial	\$ 9,150	\$ 8,285	\$ 8,519	\$ 8,889
Portfolio	\$ 2,255	\$ 2,288	\$ 2,268	\$ 2,270
Company Incentive	\$ 792	\$ 905	\$ 1,019	\$ 1,139
Total Budget	\$ 36,932	\$ 34,166	\$ 34,846	\$ 34,951

Sources:

1) 2024-2026 Plan from Docket 23-35-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and 2024 Energy Efficiency Plan, October 2, 2023, Schedule A, Attachment 2, Bates Pages 127, 129, and 131.

2) 2023 Plan from Docket No. 22-33-EE, The Narragansett Electric Company's d/b/a Rhode Island Energy's 2023 Annual Energy Efficiency Plan Compliance Filing, January 23, 2023, Attachment 6, Table G-5 - Primary Calculation of 2023 Program Year Cost-Effectiveness, Page 5.

Q. DOES THE DIVISION HAVE ANY CONCERNS RELATIVE TO THE BUDGETS PROPOSED IN THE 2024 ANNUAL PLAN?

A. Yes. The Division remains concerned that the entirety of the proposed 2024 EE Plan's electric portfolio budget will be utilized. Since the pandemic, RIE's predecessor, National Grid had not been able to spend 100 percent of its electric portfolio budget. Table 9 below shows the budget without RIE's performance incentive versus actual spending by year from 2018 to 2022. Spending ranged from 76 to 85 percent of budget between 2020 and 2022.

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Table 9. Actual Spend v. Budget for EE Plan Years 2018 through 2022 ⁹

EE Plan Year – Electric (\$000)	2018	2019	2020	2021	2022
Budget (without utility incentive)	\$86,933.4	\$97,846.9	\$106,029.4	\$111,286.3	\$106,699.5
Actual Spend	\$85,214.6	\$100,729.2	\$88,224.3	\$94,564.0	\$80,851.6
Percentage of Budget Spent	98%	103%	83%	85%	76%
Year-End Balance	\$0.2	\$3,745.2	\$22,821.4	\$20,359.2	\$39,947.2

Division submits that a utility has a responsibility to collect from its customers an amount commensurate with its ability to utilize in a calendar year. Right-sized budget funding becomes even more critical now that Rhode Island ratepayers continue to find themselves faced with historically high electricity and gas rates. The Division’s review highlights the fact that there has been consistent and significant underspending relative to proposed electric portfolio budgets since the pandemic.

Q. HAS THE DIVISION HAD THE OPPORTUNITY TO REVIEW THE 2023 SPENDING TREND?

A. Yes. The current program year, the 2023 EE Plan, is RIE’s first year implementing the EE program. The most recent Quarterly Report filed on November 9, 2023, had a Percent Achieved budget spend of 38.2 percent which amounted to \$37.2 million of the \$97.4 million approved 2023 budget. The report also showed a Year-End Forecast spend of 93.1 percent which would result in a Fourth Quarter spend of \$53.1 million and a total annual

⁹ Energy Efficiency Year-End Reports.

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1 spend of \$90.6 million. The Company's response to Division 1-14 indicates that the large
2 projected spend in Quarter 4 is attributable to the "hockey stick" effect. The Division is
3 concerned that if this spending does not come to fruition, then the EE fund will finish the
4 year with a sizable year-end balance that is not considered in the Company's calculation of
5 the proposed SBC. The Division requests that the Company provide updated projections
6 of the 2023 spend and year-end fund balances for both the electric and gas programs at the
7 start of the hearings. In addition, the Division requests the Company provide updated
8 calculations of the proposed SBC factors based on the updates.

9 **Q. IS THE DIVISION RECOMMENDING ANY ADJUSTMENTS TO THE 2024**
10 **BUDGET BASED ON YOUR CONCERNS REGARDING THE RECENT**
11 **UNDERSPEDNING TREND?**

12 A. Not at this time. Though the ability to spend the proposed 2024 budget remains a concern
13 for the Division, we understand that the Company will be increasing marketing and
14 outreach activities which should assist in the uptake of EE opportunities by customers and
15 further assist in reaching the proposed 2024 spending levels. At this time, the Division
16 requests that, based on fourth quarter spending trends, the Company provide an update in
17 their rebuttal testimony and at the hearing on whether the Company believes the proposed
18 2024 budget is attainable or whether a lower level should be considered.

19 **VII. RECOMMENDATIONS**

20 **Q. PLEASE SUMMARIZE THE DIVISION'S RECOMMENDATIONS.**

21 A. The Division recommends:

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- 1 • That the Commission find that the *EE Plans* are consistent with the LCP Statute
2 and Standards.
- 3 • That the Commission find that the *EE Plans* support the goals of the Act on
4 Climate.
- 5 • That the Commission use the best and most updated information, by the time of
6 the hearings in December, regarding the Company's projected spends for both the
7 electric and gas portfolios, as well as the Year-End Balance projection to make
8 its decision regarding the appropriate SBC to support the *2024 EE Plan*.
- 9 • Further discussion and exploration to advance data tracking related to the
10 Act on Climate and the Justice40 Initiative as new sources of funding may
11 require improvements to reporting. Specifically, the Division is interested
12 in understanding the heating fuel used by RIE's customers and which of
13 its customers reside in a Justice40 community.

14 **Q. DOES THIS CONCLUDE OF THE DIVISION'S DIRECT TESTIMONY?**

15 **A. Yes, it does.**

Exhibit JK-1

Resume of Jennifer Kallay

Jennifer Kallay, Principal Associate

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jkallay@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics, Inc., Cambridge, MA. *Principal Associate*, April 2023 – Present; *Senior Associate*, June 2013 – April 2023; *Associate*, July 2008 – June 2013; *Research Associate*, January 2007 – July 2008.

Ms. Kallay has 15 years of experience analyzing the benefits and costs of electric and natural gas energy efficiency efforts for jurisdictions in the United States and Canada including Massachusetts, Rhode Island, Hawaii, Vermont, New Jersey, Arkansas, Minnesota, Virginia, Prince Edward's Island, Ontario, New Mexico, Alberta, and Nova Scotia. She supports the Rhode Island Division of Public Utilities and Carriers in assessing the impacts of utility energy efficiency plans and delivery strategies on customers. Her work entails reviewing different regulatory approaches to spur energy efficiency; assessing the ability of utility energy efficiency plans to tap into cost-effective potential; researching best practice program designs and policies; understanding and accounting for the full benefits of energy efficiency; and conducting rate and bill impact, participant, and cost-effectiveness analyses. She takes these energy efficiency analysis tools and adapts them to assess the impacts of other utility efforts, such as distributed energy resources. She also:

- Improves grid resilience planning and practices through work on goal setting, scoping, evaluation and prioritization criteria, performance monitoring and incentives, regulatory approaches, and cost recovery mechanisms.
- Assesses the disparate impacts of electric and natural gas infrastructure on economic, social, and health outcomes and identifies and evaluates solutions for improving energy equity.
- Leads stakeholder workshops to provide context on regulatory practices and opportunities for public engagement, collect public input, and integrate public input into electric and gas system regulation and planning.

Boston University's Center for Energy and Environmental Studies, Boston, MA. *Research Assistant for Professor Robert Kaufmann*, January 2006 – January 2007.

Modeled land-use change in the Amazon using spatial, economic, climatic, and physical variables, and GIS and regression techniques.

Digitas, Inc., Boston, MA. *Manager*, November 1999 – August 2005.

Researched, designed, and executed reporting solutions to assess the effectiveness of marketing strategies based on consumer behavior. Customized analyses to gain insight into environmental influences on marketing performance and designed and built models to predict sales/revenue and inform business economics using relational databases.

PROFESSIONAL ACTIVITIES

Gas and Light Commissioner. *Elected Public Official.* 2018-present. Serves on Wakefield Massachusetts' Municipal Gas and Light Department Board of Commissioners.

EDUCATION

Boston University, Boston, MA

Master of Arts in Energy and Environmental Analysis, Spring 2007. Graduate course work in multivariate statistical analysis, environmental economics, risk assessment, energy, GIS, climate change, and environmental policy.

University of Maryland, College Park, MD

Bachelor of Arts in Journalism, Spring 1999. Presidential Scholarship and Honors Program.

PUBLICATIONS

Synapse Energy Economics, Climable, Brown University Climate and Development Lab. 2023. *Power Play: Actions for New England's Equitable Energy Transition*. Full report. Climable.org.

Rickerson, W., E. Brousseau, A. Douglas, J. Kallay, S. Singh Walker, A. Hopkins, A. Napoleon, K. Takahashi. 2022. *Future Proofing the Texas Grid with Distributed Energy Resources*. Prepared by Converge Strategies and Synapse Energy Economics for the Texas Advanced Energy Business Alliance.

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TESTIMONY

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Rhode Island Public Utilities Commission (Docket 22-33-EE): Direct Testimony regarding the Narragansett Electric Co. d/b/a Rhode Island Energy's Annual Energy Efficiency Plan for 2023. On behalf of the Division of Public Utilities and Carriers, November 4, 2022.

Rhode Island Public Utilities Commission (Docket 5189): Direct Testimony regarding the Narragansett Electric d/b/a National Grid's 2022 Energy Efficiency Plan (EEP). On behalf of the Division of Public Utilities and Carriers, November 17, 2021.

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Resume updated November 2023