

LETICIA C. PIMENTEL

One Financial Plaza, 14th Floor
Providence, RI 02903-2485
Main (401) 709-3300
Fax (401) 709-3378
lpimentel@rc.com
Direct (401) 709-3337

Also admitted in Massachusetts

November 10, 2023

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Dear Ms. Massaro:

**Re: Docket No. 23-35-EE – 2024-2026 Three Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to Division Data Requests – Set 3**

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed the Company’s responses to the Third Set of Data Requests issued by the Division of Public Utilities and Carriers in the above-referenced docket.

Please contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,



Leticia C. Pimentel

cc: Docket 23-35-EE Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Heidi J. Seddon

November 10, 2023

Date

**Docket No. 23-35-EE – Rhode Island Energy’s EE Plan 2024-2026 Three-Year Plan and 2024 Annual EEP
Service list updated 10/4/2023**

Name /Address	E-mail Distribution List	Phone
<p>The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. 280 Melrose St. Providence, RI 02907</p> <p>Leticia C. Pimentel, Esq. Steve Boyajian, Esq. Robinson & Cole LLP One Financial Plaza, 14th Floor Providence, RI 02903</p>	amarcaccio@pplweb.com ;	401-784-4263
	cobrien@pplweb.com ;	
	jhutchinson@pplweb.com ;	
	jscanlon@pplweb.com ;	
	dmoreira@rienergy.com ;	
	MOcCrayne@rienergy.com ;	
	BSFeldman@rienergy.com ;	
	ACLi@rienergy.com ;	
	DJTukey@rienergy.com ;	
	SBriggs@pplweb.com ;	
	BJPelletier@rienergy.com ;	
	JOliveira@pplweb.com ;	
	Teast@rienergy.com ;	
	Masiegal@rienergy.com ;	
<p>Division of Public Utilities & Carriers Margaret L. Hogan, Esq.</p>	Cagill@rienergy.com ;	401-780-2120
	sboyajian@rc.com ;	
	LPimentel@rc.com ;	
	HSeddon@rc.com ;	
	Margaret.L.Hogan@dpuc.ri.gov ;	
	Christy.hetherington@dpuc.ri.gov ;	
john.bell@dpuc.ri.gov ;		
Joel.munoz@dpuc.ri.gov ;		
Ellen.golde@dpuc.ri.gov ;		
Machaela.Seaton@dpuc.ri.gov ;		
Paul.Roberti@dpuc.ri.gov ;		

Tim Woolf Jennifer Kallay Synapse Energy Economics 22 Pearl Street Cambridge, MA 02139	twoolf@synapse-energy.com;	
	jkallay@synapse-energy.com;	
RI EERMC Marisa Desautel, Esq. Desautel Browning Law 38 Bellevue Ave., Unit H Newport, RI 02840	marisa@desautelbrowning.com;	401-477-0023
	Adrian.Caesar@nv5.com;	
	Craig.Johnson@nv5.com;	
	Samuel.Ross@nv5.com;	
Office of Energy Resources (OER) Albert Vitali, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	Albert.Vitali@doa.ri.gov;	401-222-8880
	Nancy.Russolino@doa.ri.gov;	
	Christopher.Kearns@energy.ri.gov;	
	William.Owen@energy.ri.gov;	
	Steven.Chybowski@energy.ri.gov;	
	Nathan.Cleveland@energy.ri.gov;	
Original & 9 copies file w/: Luly E. Massaro, Commission Clerk John Harrington, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov;	401-780-2107
	John.Harrington@puc.ri.gov;	
	Alan.nault@puc.ri.gov;	
	Todd.bianco@puc.ri.gov ;	
	Emma.Rodvien@puc.ri.gov;	
Interested Party		
Dept. of Human Services Frederick Sneesby	Frederick.sneesby@dhs.ri.gov;	
RI Infrastructure Bank Chris Vitale, Esq.,	cvitale@hvlawltd.com;	
	SUatine@riib.org;	
Green Energy Consumers Alliance Larry Chretien, Executive Director	Larry@massenergy.org;	
Amanda Barker	amanda@greenenergyconsumers.org;	
Acadia Center Emily Koo, Director	EKoo@acadiacenter.org;	401-276-0600 x402

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-1

Request:

There are different estimates of carbon reductions on different pages of the filing as summarized below. Please explain how each of these estimates is calculated. Please correct (a) to provide a range as suggested by the word 'between' rather than a single value. Please explain why the estimates for (b) and (c) are different.

- a. Bates page 20: "The electric, gas, and delivered fuel energy efficiency measures proposed for years 2024 – 2026 in this Three-Year Plan will avoid between 1,701,470 tons of carbon over the lifetime of the installed measures."
- b. Bates Pages 32, 48, and 115: "The projected energy savings from this Plan will avoid 57,811 short tons of carbon in 2024." (from Bates Page 32, as an example)
- c. Bates Pages 159, 162, 209, and 229: "The 2024 Plan is a \$130.5 million investment in helping Rhode Island customers save energy and money. This investment is expected to save 5,790,955 net lifetime MMBtu (one million British thermal units) and 634,251 net annual MMBtu across all fuels, while reducing annual carbon dioxide emissions by 71,763 short tons." (from Bates Page 159, as an example)

Response:

- a. The following sentence is a corrected version of the referenced sentence on Bates page 20: "The electric, gas, and delivered fuel energy efficiency measures proposed for years 2024 – 2026 in this Three-Year Plan will avoid 1,701,470 tons of carbon of carbon over the lifetime of the installed measures given currently available estimates of emissions factors."
- b. The 57,811 value for estimated 2024 carbon savings in short tons is correct.
- c. The 71,763 value on Bates pages 159, 162, 209, 229 is incorrect and should be changed to 57,811. However, the correct value of 57,811 was used in the cost-effectiveness analysis. The Company will correct the Plan text to reflect the accurate estimate.

Division 3-2

Request:

Bates page 41 states, "Assuming this baseline, the proposed 2024 Annual Plan would reduce Rhode Island's greenhouse gas inventory by 0.91%, thereby advancing the Act on Climate requirements." Please explain the calculation of the 0.91 percent in more detail and provide all associated workpapers that illustrate this calculation.

Response:

Rhode Island's 2021 Act on Climate mandates greenhouse gas emissions to be "forty-five percent (45%) below 1990 levels by 2030."¹ Rhode Island Energy obtained 1990 emissions level (12.77 MMTCO_{2e}) from the Rhode Island Department of Environmental Management's website.^{2,3} Rhode Island Energy converted the baseline from units of millions of metrics tons (MMT) to units of short tons using the factor 1.10231 and multiplying by 1,000,000⁴:

$$12.77 \text{ MMTCO}_2e * 1.10231 \frac{\text{short tons}}{\text{metric tons}} * 1,000,000 \frac{\text{metric tons CO}_2e}{\text{MMTCO}_2e} = 14,080,000 \text{ short tons CO}_2e$$

Using this baseline, Rhode Island Energy calculated the amount of emissions that would need to be reduced to achieve a 45 percent reduction below 1990 levels:⁵

$$14,080,000 \text{ short tons CO}_2e * 0.45 = 6,330,000 \text{ short tons CO}_2e$$

¹ R.I. Gen. Laws § 42-6.2-9, Statewide Greenhouse Gas Emission Reduction Mandate (available at <http://webserver.rilin.state.ri.us/Statutes/TITLE42/42-6.2/42-6.2-9.htm>).

² Rhode Island Department of Environmental Management, Complete 1990-2019 Rhode Island Greenhouse Gas Emissions Data, Total Gross Emissions (available at <https://dem.ri.gov/environmental-protection-bureau/air-resources/greenhouse-gas-emissions-inventory>).

³ Please note that the Rhode Island Department of Environmental Management has since updated its data, which resulted in an updated value of 1990 emissions. See footnote 5 for further discussion.

⁴ U.S. Energy Information Administration (available at <https://www.eia.gov/tools/faqs/faq.php?id=7&t=11>).

⁵ Please note that the R.I. Department of Environmental Management has not yet promulgated rules or regulations regarding the State's methodology to assess compliance with the 2030 mandate. In this calculation, Rhode Island Energy used Total Gross Emissions. In the most recent Rhode Island Greenhouse Gas Emissions Inventory, (published October 2023), Rhode Island Department of Environmental Management assessed compliance with the 2021 Act on Climate 2020 mandate using Total Net Emissions. Using the same value, the estimated emissions reductions anticipated to result from the proposed 2024 Plan represent 1.01 percent of the emissions reduction required to reduce Rhode Island's greenhouse gas emissions by 45 percent below 1990 levels.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-2, Page 2

The gas and electric energy efficiency portfolios proposed in the 2024 Annual Plan are estimated to reduce carbon emissions by 57,811 short tons in 2024. Rhode Island Energy calculated the proportion of 2024 Plan emissions reduction to the emissions reduction equivalent to 45 percent of the 1990 emissions baseline:

$$\frac{57,811 \text{ short tons } CO_2}{6,330,000 \text{ short tons } CO_2e} = 0.0091 = 0.91\%$$

These calculations show that the estimated emissions reductions anticipated to result from the proposed 2024 Plan represent 0.91 percent of the emissions reduction required to reduce Rhode Island's greenhouse gas emissions by 45 percent below 1990 levels.⁶

⁶ Please note that this statement is intended to be representative. This calculation compares emissions reductions that occur in 2024 to the amount of emissions reductions required in 2030. This statement does not imply the same level of 2024 emissions reductions will persist in 2030.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-3

Request:

Please refer to the Company's response to Division 1-1 which states, "the 15% targeted quoted...refers to a conversion of 15% of Rhode Island's buildings from fossil fuel heat to efficient electric heating by 2030."

- a. Please clarify if the Target 15% of Penetration of Energy Efficient Electric Heating by 2030 is calculated as a percentage of a) customers with fossil fuel heating b) customers with electric heating or c) all customers.
- b. Please provide current customer counts for Residential, Income Eligible, and C&I.

Response:

- a. Rhode Island Energy's understanding is that the target referenced is for 15% of all Rhode Islanders to have energy efficiency electric heating. Given the Rhode Island Executive Climate Change Coordinating Council's statewide role, Rhode Island Energy does not think the council's target is limited to Rhode Island Energy's customers. The Company respectfully defers to the Rhode Island Executive Climate Change Coordinating Council for clarification and confirmation.
- b. Below are the counts as of September 2023.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division’s Third Set of Data Requests
Issued on October 31, 2023

Division 3-3, Page 2

Electric	
Residential	408,322
Low Income	39,678
C&I	61,264
Street Lighting	2,264
Propulsion & Station Power	3
Total Electric	511,531
Gas	
Residential Non-Heat	13,560
Residential Heat	211,361
Low Income Res Non Heat	956
Low Income Res Heat	23,305
Non-Firm	10
C&I	24,379
Default	7
Gas Lamps & Other	31
Total Gas	273,609
Total September	785,140

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-4

Request:

Please refer to the Company's responses to Division 1-1 and Division 1-2.

- a. Why are the Residential and Income Eligible data in Table 3 of Division 1-1 different from the Residential the Income Eligible data in the table in Division 1-2(a)?
- b. Regarding the table in Division 1-2(a), why are savings from heat pumps in the C&I sector lower in 2024 and 2025 than in 2023?
- c. Regarding the table in Division 1-2(b), what is driving the increase in savings from gas heating systems in the C&I sector from 2024 to 2025 and from 2025 to 2026?
- d. Regarding the table in Division 1-2(c), why are the number of weatherization measures in the Residential sector lower in 2024, 2025, and 2026 as compared to 2023?
- e. Regarding the table in Division 1-2(c), why do the number of weatherization measures in the Income Eligible sector decline from 2024 to 2025 and from 2025 to 2026?
- f. On page 78 of its plan, the Company states, "Within the cost-effectiveness framework, the Company undertook an effort to shift funds from gas-consuming equipment to measures that help use gas more efficiently such as weatherization." In which sector(s) did this shift occur? (The only sector with increases in weatherization efforts in 2024-2026 as compared to 2023 is C&I.)

Response:

- a. After reviewing the Company's response in Table 3 of Division 1-1(c) and the table in Division 1-2(a), the quantities provided in the Company's response to Division 1-2(a) should replace the quantities provided in the Company's response to Division 1-1(c). The planning quantities provided in the Company's response to Division 1-2(a) are provided below in Table 1, along with heat pump water heating planning quantities included in the table.

Division 3-4, Page 2

Table 1. Residential and Income Eligible Heat Pump Planned Quantities

HEAT PUMPS	2024	2025	2026
Residential – Space Heating ⁽¹⁾	2,756	2,975	3,177
Residential – Water Heating	220	231	243
Income Eligible – Space Heating	125	194	199
Income Eligible – Water Heating	3	4	5
C&I ⁽²⁾	1,200,917 kWh	1,304,474 kWh	1,420,131 kWh

⁽¹⁾ Planned quantities include a number of heat pumps in residential new construction; actual installations in 2023 in new construction are not tracked as a unique measure.

⁽²⁾ C&I quantities are forecasted based on kWh savings.

- b. The Company decreased the 2024 and 2025 Commercial and Industrial planned heat pump quantities after reviewing the year-to-date actual heat pump installations for 2023 which are projected to be less than the 2023 planned totals.
- c. The increase in gas heating savings from 2024 to 2026 can be attributed to additional planned MMBtu savings from New Construction Steam Boilers. This adjustment represents a less than 1% increase year-over-year to planned savings from gas heating systems.
- d. The table provided in the Company’s response to Division 1-2(c) reflects the quantity of measures. While the quantity decreases slightly, the overall annual planned savings targets for both gas and electric actually increase from 2023 through 2024, 2025, and 2026. Adjustments to measure quantities are made based on recent historical performance and reflect what the Company believes is an appropriate target given market conditions and other factors.
- e. The table provided in the Company’s response to Division 1-2(c) reflects the quantity of measures. While the quantity decreases slightly, the overall annual planned savings targets for electric actually increase from 2023 through 2024, 2025, and 2026. Annual planned savings targets for gas do decrease; this adjustment was made based on 2023 YTD data and projections. Adjustments to measure quantities are made based on recent historical performance and reflect what the Company believes is an appropriate target given market conditions and other factors.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-4, Page 3

- f. Yes, the shift of funds from gas-consuming equipment to measures that help use gas more efficiently such as weatherization was to measures in the C&I sector.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-5

Request:

Please refer to the Company's responses to Division 1-3(d) and (e).

- a. Please provide a list of the gas efficiency measures with no viable electric alternative, regardless of whether they were reduced or discontinued.
- b. Please provide the measure-level benefit-cost ratio for each of these measures. Please reference the values in the 2023 and 2024 EE Plans in your response.
- c. Please provide a summary of the participants and incentive budgets for these measures, in aggregate across all of the relevant measures. Please reference the values in the 2023 and 2024 EE Plans in your response.

Response:

- a. Residential Sector: The four measures found in Table 1 below are custom projects for multifamily. Some could be for large multifamily properties where it would be difficult to have an electric alternative (although not theoretically impossible). However, some of these custom measures could also be for a small multifamily property (e.g., six units) in which case an electric alternative could be more viable.

C&I Sector: Assessing the viability of electric alternatives in the industrial sector is largely dependent on the manufacturing and processes requirements. For instance, customers requiring high-heat values for manufacturing may be unable to find electric alternatives that are technologically viable. Additionally, there may be industrial customers that could install partial electric alternatives for heating demands, whereby electric space heating is viable but the industrial process heating requirements remain largely dependent on gas fuels. Therefore, determining the viability of electric alternatives is often dependent on the customers' process and manufacturing requirements.

However, if industrial customers requiring high-heat values are excluded then commercial and industrial business customers are able to replace existing gas measures with electric alternatives without a fundamental change to their industrial or commercial process or operation. Therefore, from a technological perspective, viable electric alternatives exist for commercial and industrial customers; although, this does not consider the economic feasibility of these electric alternatives.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-5, Page 2

Table 1: Residential Gas Efficiency Measures with No Viable Electric Alternative

Unique Measure Identifier	Program	Measure Name
GasA03b Residential Retrofit Multifamily Heating, Custom	EnergyWise Multifamily	Heating, Custom
GasB03b Low Income Retrofit Multifamily Custom	Income Eligible Multifamily	Custom
GasB03b Low Income Retrofit Multifamily HEATING _Custom_LI	Income Eligible Multifamily	HEATING _Custom_LI
GasC&I Multifamily Heating, Custom	C&I Multifamily	Heating, Custom

b. Please see the table below.

Program	Measure Name	2023 Benefit / Cost Ratio	2024 Benefit / Cost Ratio
EnergyWise Multifamily	Heating, Custom	1.29	1.27
Income Eligible Multifamily	Custom	1.67	1.67
Income Eligible Multifamily	HEATING _Custom_LI	1.00	0.98
C&I Multifamily	Heating, Custom	0.89	0.88

c. Please see the table below.

Program	Measure Name	2023 Participants (Measure Quantity)	2023 Participant Cost	2023 Incentive Budget	2024 Participants (Measure Quantity)	2024 Participant Cost	2024 Incentive Budget
EnergyWise Multifamily	Heating, Custom	3	\$56,400	\$84,600	3	\$56,400	\$84,600
Income Eligible Multifamily	Custom	45	\$0	\$715,500	44	\$0	\$699,600
Income Eligible Multifamily	HEATING _Custom_LI	12	\$0	\$1,620,000	11	\$0	\$1,485,000
C&I Multifamily	Heating, Custom	11	\$352,000	\$528,000	11	\$352,000	\$528,000
Total		71	\$408,400	\$2,948,100	69	\$408,400	\$2,797,200

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division’s Third Set of Data Requests
Issued on October 31, 2023

Division 3-6

Request:

Please refer to the Company’s response to Division 1-5. Please provide the number of gas and all-electric homes and businesses has incentivized to date in 2023.

Response:

Please see Tables 1 and 2 for the gas and all-electric homes and businesses that the Company has incentivized year to date (YTD) as of 9/30/2023 for Residential Homes and 11/8/2023 for C&I Businesses. The C&I Businesses value in Table 2 below (column = “2023 YTD”) reflects two separate buildings for the same customer.

Table 1: RIE New Gas Homes and Businesses Projects

	2023 YTD	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Residential Homes	85	218	250	233	145
C&I Businesses	0	0	N/A	N/A	N/A

Table 2: RIE New All-Electric Homes and Businesses Projects

	2023 YTD	2023 Plan	2024 Plan	2025 Plan	2026 Plan
Residential Homes	100	489	339	383	493
C&I Businesses	2	2	N/A	N/A	N/A

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-7

Request:

Please refer to the Company's response to Division 1-9(c). How does the Company confirm that a heat pump will be used as a customers' primary source for heating and cooling?

Response:

The Company does not directly confirm that a heat pump will be used as a customers' primary source for heating and cooling; the Company relies on its program vendor for this confirmation. The vendor confirms using a random sample using the assumption that those findings are a good proxy for overall compliance. The last analysis was conducted in 2022 on a sample of 12 homes and found 100% of homes used the heat pump(s) as the primary source for cooling and heating.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-8

Request:

Please refer to the Company's response to Division 1-10. How will the Company align its programs with the Justice40 Initiative?

Response:

The Company's ability to align its programs with the Justice40 initiative largely relies on its capability to track which customers are living in a Justice40 community. In its response to Division 3-10, the Company states that it is investigating the possibility of tracking this information. Considering this limitation, the Company plans to align its programs with the Justice40 Initiative in a few ways, which are listed below.

- The Residential Equity Outreach Assessment will aim to partner with community-based organizations in one or more Justice40 communities. This alignment does not require the ability to track which customers are living in a Justice40 community.
- The Company is planning to report on program participation in Justice40 communities in the 2024 Energy Efficiency Year-End Report, which will be issued in Q2 2025. This alignment requires the ability to track which customers are living in a Justice40 community.
- The Company is planning to target some of its marketing campaigns and outreach efforts to Justice40 communities during the 2024 plan year. The ability to track which customers are living in a Justice40 community is a key enabler of these marketing activities.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-9

Request:

Please refer to the Company's response to Division 1-11(a). For each pre-weatherization barrier listed, please indicate how common each one is, and provide the estimated cost to remediate each one.

Response:

For the EnergyWise program, the response in 1-12(a)¹ included a list of both weatherization barriers and client disclosures. Weatherization barriers are hard barriers that prevent work from proceeding unless they are remediated. Client disclosures do not prevent work from proceeding but are brought to the homeowner's attention.

The weatherization barriers for the EnergyWise program are listed below:

CARBON MONOXIDE
COMBUSTION GAS SPILLAGE
CRAWLSPACE HEIGHT/NO VAPOR BARRIER
CUSTOM BARRIER
DEPRESSURIZATION HAZARD
ELECTRICAL HAZARD
GAS LEAK
INDOOR AIR QUALITY
INOPERABLE HEATING SYSTEM
KNOB & TUBE WIRING
KNOB & TUBE WIRING SIGN-OFF
MOISTURE BARRIER
MOLD AND/OR MILDEW
NAILED WALL PANELS
PEST INFESTATION IN ATTIC
PROPER ATTIC VENTILATION
RIDGE VENT OPENED UP
UNVENTED COMBUSTION APPLIANCE
VERMICULITE HAZARD MUST MITIGATE

¹ This data request references Division 1-11(a), however, the Company's response to data request Division 1-12(a) lists pre-weatherization barriers.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division’s Third Set of Data Requests
Issued on October 31, 2023

Division 3-9, Page 2

From January 1, 2022, through June 30, 2023, 6,374 instances of weatherization barriers were identified in the EnergyWise program. The top ten most common barriers and their estimated remediation costs are listed below:

Weatherization Barrier	Instances	% of Total	Estimated Remediation Cost
Knob & Tube Wiring	1,970	30.9%	\$ 7,500
Knob & Tube Wiring Sign Off	1,319	20.7%	\$ 250
Mold and/or Mildew	809	12.7%	\$ 3,500
Carbon Monoxide	389	6.1%	\$ 10,000
Depressurization Hazard	306	4.8%	\$ 1,200
Custom Barrier	255	4.0%	\$ 250-10,000
Indoor Air Quality	166	2.6%	\$ 1,000
Combustion Gas Spillage	159	2.5%	\$ 10,000
Moisture Barrier	153	2.4%	\$ 1,200

For Income Eligible Single Family (IE SF), the data on pre-weatherization barriers is difficult to obtain. Low Income Home Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP) funds are generally used to remediate pre-weatherization barriers. The Company does not have a clear line of sight into what is spent through LIHEAP and WAP funds, because these funds are administered through the Rhode Island Department of Human Services (DHS). The IE SF program typically allocates 3% of the program budget to be used as a contingency. This 3% is used to push forward a project where LIHEAP and/or WAP funds cannot fully remediate or solve the relevant barriers.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-10

Request:

Please refer to the Company's response to Division 1-11. Does the Company have any plan to track which customers are living in a Justice40 community, so more of this data can be provided in the future?

Response:

The Company is investigating the possibility of integrating a mechanism to track which customers are living in a Justice40 community in its energy efficiency tracking system.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-35-EE
In Re: 2024-2026 Three-Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to the Division's Third Set of Data Requests
Issued on October 31, 2023

Division 3-11

Request:

Please refer to the Company's response to Division 1-13(c). Are there any pre-weatherization costs included in the plan for Income Eligible customers? If not, why not?

Response:

Yes, some pre-weatherization costs are included in the plan for Income Eligible customers.

In general, for Income Eligible Single Family (IE SF), Low Income Home Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP) funds are used to remediate pre-weatherization barriers (PWBs).

However, the IE SF program typically allocates 3% of the program budget to be used as a contingency; this 3% is used on occasion to push forward a project where LIHEAP and/or WAP funds cannot fully remediate or solve the relevant barriers. One example of this would be for electrical repairs due to knob and tube wiring in the attic, which must be remediated before insulation can be installed in the attic. However, these costs typically show up as "General Labor" or "General Repair" in our records, because the Company's data systems are set up to track traditional energy efficiency measures that have direct energy benefits, as opposed to pre-weatherization barriers.