



November 27 2023

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

Re: Docket 23-41-EE – Pascoag Utility District’s 2024 Annual Demand Side Management Plan

Dear Commissioners:

The Rhode Island Office of Energy Resources (OER) submits these comments in support of Pascoag Utility District’s (PUD or District) 2024 Demand Side Management Plan (the Plan) as filed on November 9, 2023, and makes its recommendation to the Commission for approval of the Plan as filed. The Plan represents a milestone in Pascoag Utility District’s (PUD) efforts, following the increase in the System Benefit Charge (SBC) in 2023’s plan to self-sustain its program moving forward, wherein 2024 will be the final year in which Regional Greenhouse Gas Initiative (RGGI) funding will be utilized for their programming. The Plan represents the continuation of Pascoag’s right-sized efforts and demonstrates the continued development of Pascoag’s ability to deliver successful programming to its customers.

The Plan broadly aims to provide benefits to customers in alignment with its collections of the SBC, ensuring a fair allocation of energy savings per sector relative to each sector’s contributions to the program. The residential weatherization program remains popular with customers, and the Plan continues to design its offering to maximize uptake and access of those incentives. The merging of the Landlord/Renter Weatherization program into the residential program provides PUD with the ability to maintain its important efforts to reach this universally challenging segment of the sector without limiting potential uptake of benefits by other customers, if needed. Additionally, the proposed change to allow qualified low-income customers to have rebates paid directly to contractors upon completion of a project reduces the upfront costs and administrative burden for those customers who are often the most in need of these energy savings and OER strongly supports this programmatic change.

With the launch of OER’s Clean Heat Rhode Island (CHRI) Heat Pump program, PUD adjusted its programming to align equipment specifications and efficiency ratings with those deployed by CHRI, ensuring that customers can now easily participate in both programs with a single purchase, furthering the ability of both programs to help customers realize energy and cost savings by maximizing their access to incentives.



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PUD is also continuing to reach out to its electric resistance heating customers it had previously identified, and will offer an enhanced incentive to help those customers move away from their energy intensive heating systems to more efficient technology and energy bill savings. With the anticipated effort to complete the lighting project at Bayberry Nursing in 2024, PUD will have completed lighting projects at 8 of their 10 largest commercial energy users, and new non-lighting measures will need to be explored. Further efforts in 2024 will serve to determine how best to transition its programming incentives for the Commercial and Industrial sector. PUD has a plan to re-engage more directly with relevant C&I personnel to better understand what new pathways those customers need to achieve greater efficiency for their facilities, and PUD continues to refine and enhance its outreach and marketing efforts across its service territory.

Moving forward, PUD is working with OER and Rewiring America to ensure the district's residents and businesses are able to accurately access the specific electric energy efficiency incentives available to them via a single dashboard, making it easier for customers to research and explore potential cost savings. OER finds that PUD's effectiveness in developing its energy efficiency programming into a self-sustaining, evolving effort that provides value and cost savings to customers is evident, and aligns with Rhode Island's long-term energy goals and advances our State's ability to meet the Act on Climate targets.

OER thanks the Commission for its consideration, and respectfully requests their approval of Pascoag Utility District's 2024 Demand Side Management plan as filed.

Sincerely,

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

Chris Kearns

Acting Commissioner
Office of Energy Resources