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December 7, 2023

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

**Re: Docket No. 23-35-EE – 2024-2026 Three Year Energy Efficiency Plan and
2024 Annual Energy Efficiency Plan
Responses to PUC Data Requests – Set 6**

Dear Ms. Massaro:

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 Sixth Set of Data Requests issued by the Public Utilities Commission 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

December 7, 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**

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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 Commission's Sixth Set of Data Requests
Issued on December 1, 2023

PUC 6-1

Request:

Please recalculate the 2024 gas and electric Performance Incentive assuming the following hypothetical scenarios:

- a. Natural gas, oil, and other resource benefits are valued at 25%.
- b. Natural gas, oil, and other resource benefits are valued at 0%.

Response:

Please see Attachment PUC 6-1-1 for recalculated 2024 electric performance incentives assuming the stated hypothetical scenarios. Please see Attachment PUC 6-1-2 for recalculated 2024 gas performance incentives assuming the stated hypothetical scenarios.

Please note that this response incorporates corrections from the Corrected Responses to PUC and Division Data Requests filed on December 5, 2023, and/or other corrections made in this docket.

Table E-8C
Rhode Island Energy
2024 PIM and SQA (\$000)
Resource Benefits Valued at 25%

	Performance Incentive								
	Eligible Benefits		Eligible Costs	Eligible Net Benefits	Design Performance Achievement	Design Payout Rate	Design Performance Payout	Payout Cap	Service Quality Adjustment Applied
	100% Utility System Benefits	25% Resource Benefits							
Residential	\$28,203	\$2,592	\$30,238	\$557	\$557	10.1%	\$56	\$70	FALSE
Income Eligible Residential	\$7,904	\$430	\$16,230	-\$7,896	\$2,000	25.0%	\$500	\$625	TRUE
Commercial & Industrial	\$79,625	-\$130	\$40,592	\$38,903	\$38,903	10.1%	\$3,931	\$4,914	FALSE

Table E-8C
Rhode Island Energy
2024 PIM and SQA (\$000)
Resource Benefits Valued at 0%

	Performance Incentive								
	Eligible Benefits		Eligible Costs	Eligible Net Benefits	Design Performance Achievement	Design Payout Rate	Design Performance Payout	Payout Cap	Service Quality Adjustment Applied
	100% Utility System Benefits	0% Resource Benefits							
Residential	\$28,203	\$0	\$30,238	-\$2,035	\$2,000	25.0%	\$500	\$625	TRUE
Income Eligible Residential	\$7,904	\$0	\$16,230	-\$8,326	\$2,000	25.0%	\$500	\$625	TRUE
Commercial & Industrial	\$79,625	\$0	\$40,592	\$39,033	\$39,033	10.1%	\$3,944	\$4,931	FALSE

Table G-8C
Rhode Island Energy
2024 PIM and SQA (\$000)
Resource Benefits Valued at 25%

	Performance Incentive								
	Eligible Benefits		Eligible Costs	Eligible Net Benefits	Design Performance Achievement	Design Payout Rate	Design Performance Payout	Payout Cap	Service Quality Adjustment Applied
	100% Utility System Benefits	25% Resource Benefits							
Residential	\$10,056	\$116	\$15,209	-\$5,037	\$2,000	25.0%	\$500	\$625	TRUE
Income Eligible Residential	\$2,734	\$30	\$7,711	-\$4,948	\$2,000	25.0%	\$500	\$625	TRUE
Commercial & Industrial	\$15,838	\$89	\$8,511	\$7,416	\$7,416	11.7%	\$868	\$1,085	FALSE

Table G-8C
Rhode Island Energy
2024 PIM and SQA (\$000)
Resource Benefits Valued at 0%

	Performance Incentive								
	Eligible Benefits		Eligible Costs	Eligible Net Benefits	Design Performance Achievement	Design Payout Rate	Design Performance Payout	Payout Cap	Service Quality Adjustment Applied
	100% Utility System Benefits	0% Resource Benefits							
Residential	\$10,056	\$0	\$15,209	-\$5,153	\$2,000	25.0%	\$500	\$625	TRUE
Income Eligible Residential	\$2,734	\$0	\$7,711	-\$4,978	\$2,000	25.0%	\$500	\$625	TRUE
Commercial & Industrial	\$15,838	\$0	\$8,511	\$7,327	\$7,327	11.7%	\$857	\$1,072	FALSE

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PUC 6-2

Request:

Has the Company ever decreased an incentive mid-year for a given measure? If yes, please explain the specific measure(s), the reasons for the adjustment, and the result of the adjustment.

Response:

The Company has on occasion decreased an incentive mid-year for a given measure. However, the Company does not systematically track such instances. The most recent example of a mid-year incentive decrease known to the Energy Efficiency team occurred in program year 2021. In 2020, program activity was adversely affected by the emergence of the COVID-19 pandemic. Among other actions taken, the weatherization incentive was increased to 100% of weatherization costs to attract customers to participate, to support increasing residential energy costs during the shift to working and living at home full time, and to build a pipeline of weatherization projects in support of the independent insulation contractors (IIC). This spurred demand and created a pipeline of weatherization projects. The spur in demand created by the 100% incentive offer created a large backlog of projects, but this pipeline ultimately had the desired effect. In 2021, IIC contractor levels did return and even exceeded 2020 pre-COVID staffing levels. The Company started 2021 with a 75% incentive and revised the incentive offer to 50% of project costs in June 2021 because of forecasted overspend.

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PUC 6-3

Request:

When calculating avoided GHG costs for purposes of performing the cost of supply analysis, does the Company count avoided GHG costs from all energy savings (electric, gas, oil and propane) or just regulated fuel savings (electric and gas)?

Response:

When calculating avoided GHG costs for purposes of performing the cost of supply analysis, the Company does count avoided GHG costs from all energy savings (electric, gas, oil and propane) if savings from those fuels exist. There are no avoided GHG costs from delivered fuels in the gas portfolio.

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PUC 6-4

Request:

Please file alternative versions of Tables 1a, 1b, 2a, and 2b from PUC 2-7 that remove any costs associated with delivered fuels (e.g. fuel costs, avoided GHG compliance costs from oil or propane savings, etc.) from the “cost of supply” columns.

Response:

Please see below for the alternative versions of Tables 1a, 1b, 2a, and 2b from the Company’s response to data request PUC 2-7 that remove any costs associated with delivered fuels from the cost of supply. The costs associated with delivered fuels that were removed from the cost of supply are oil avoided costs, propane avoided costs, oil / propane associated carbon avoided costs, and oil / propane associated NOx avoided costs. Please note that the gas portfolio does not have any avoided costs associated with delivered fuels. Therefore, Tables 2a and 2b are the same as filed in the Company’s response to PUC 2-7.

Table 1a: Difference Between the Cost of Energy Efficiency and the Cost of Energy Supply, Electric Plan Total

	Total Cost of Supply Benefits	Total Cost of Supply Expenses	Total Cost of Supply (Benefits Minus Expenses)	Total Cost of Supply per Lifetime kWh
Residential	\$31,733,592	\$38,939,732	-\$7,206,140	-\$0.038
Residential New Construction	\$2,007,396	\$1,839,571	\$167,825	\$0.011
Residential HVAC	\$15,647,683	\$10,014,153	\$5,633,530	\$0.050
EnergyWise Single Family	\$3,200,572	\$20,743,642	-\$17,543,071	-\$1.170
EnergyWise Multifamily	\$1,273,565	\$1,564,374	-\$290,810	-\$0.036
Home Energy Reports	\$5,756,280	\$2,340,198	\$3,416,081	\$0.146
Residential Consumer Products	\$3,848,097	\$2,437,793	\$1,410,305	\$0.092
Income Eligible Residential	\$8,849,742	\$17,109,718	-\$8,259,976	-\$0.149
Income Eligible Single Family	\$6,807,509	\$13,068,518	-\$6,261,009	-\$0.170
Income Eligible Multifamily	\$2,042,234	\$4,041,201	-\$1,998,967	-\$0.108
Commercial & Industrial	\$94,722,164	\$57,754,797	\$36,967,367	\$0.076
Large C&I New Construction	\$31,178,349	\$11,695,283	\$19,483,066	\$0.107
Large C&I Retrofit	\$53,211,214	\$35,472,653	\$17,738,561	\$0.073
Small Business Direct Install	\$10,332,602	\$10,586,861	-\$254,260	-\$0.004
Total	\$135,305,498	\$113,804,247	\$21,501,251	\$0.029

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Table 1b: Difference Between the Cost of Energy Efficiency and the Cost of Energy Supply,
Electric Plan Intrastate Only

	Total Cost of Supply Benefits	Total Cost of Supply Expenses	Total Cost of Supply (Benefits Minus Expenses)	Total Cost of Supply per Lifetime kWh
Residential	\$26,097,014	\$38,939,732	-\$12,842,718	-\$0.067
Residential New Construction	\$1,743,856	\$1,839,571	-\$95,715	-\$0.006
Residential HVAC	\$13,001,541	\$10,014,153	\$2,987,388	\$0.026
EnergyWise Single Family	\$2,557,949	\$20,743,642	-\$18,185,693	-\$1.213
EnergyWise Multifamily	\$1,054,085	\$1,564,374	-\$510,289	-\$0.063
Home Energy Reports	\$4,707,171	\$2,340,198	\$2,366,972	\$0.101
Residential Consumer Products	\$3,032,412	\$2,437,793	\$594,619	\$0.039
Income Eligible Residential	\$7,300,201	\$17,109,718	-\$9,809,518	-\$0.177
Income Eligible Single Family	\$5,580,797	\$13,068,518	-\$7,487,721	-\$0.203
Income Eligible Multifamily	\$1,719,404	\$4,041,201	-\$2,321,797	-\$0.125
Commercial & Industrial	\$74,849,017	\$57,754,797	\$17,094,220	\$0.035
Large C&I New Construction	\$25,141,786	\$11,695,283	\$13,446,503	\$0.074
Large C&I Retrofit	\$41,606,344	\$35,472,653	\$6,133,692	\$0.025
Small Business Direct Install	\$8,100,887	\$10,586,861	-\$2,485,974	-\$0.043
Total	\$108,246,231	\$113,804,247	-\$5,558,016	-\$0.008

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Table 2a: Difference Between the Cost of Energy Efficiency and the Cost of Energy Supply,
Gas Plan Total

	Total Cost of Supply Benefits	Total Cost of Supply Expenses	Total Cost of Supply (Benefits Minus Expenses)	Total Cost of Supply per Lifetime MMBtu
Residential	\$17,496,821	\$19,486,780	-\$1,989,959	-\$1.81
Residential New Construction	\$1,097,663	\$931,809	\$165,854	\$2.26
Residential HVAC	\$3,281,422	\$3,502,611	-\$221,189	-\$1.00
EnergyWise Single Family	\$10,070,379	\$13,052,080	-\$2,981,701	-\$4.86
EnergyWise Multifamily	\$1,608,265	\$1,616,105	-\$7,840	-\$0.08
Home Energy Reports	\$1,439,092	\$384,174	\$1,054,917	\$12.31
Income Eligible Residential	\$4,742,017	\$8,148,053	-\$3,406,037	-\$11.85
Income Eligible Single Family	\$2,027,559	\$4,843,565	-\$2,816,006	-\$23.21
Income Eligible Multifamily	\$2,714,458	\$3,304,489	-\$590,031	-\$3.55
Commercial & Industrial	\$29,755,724	\$13,379,559	\$16,376,165	\$8.54
Large C&I New Construction	\$10,078,198	\$2,846,540	\$7,231,658	\$11.00
Large C&I Retrofit	\$16,830,854	\$8,141,435	\$8,689,419	\$8.08
Small Business Direct Install	\$1,798,537	\$1,087,929	\$710,608	\$5.99
C&I Multifamily	\$1,048,135	\$1,303,655	-\$255,520	-\$3.89
Total	\$51,994,562	\$41,014,392	\$10,980,170	\$3.32

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Table 2b: Difference Between the Cost of Energy Efficiency and the Cost of Energy Supply,
Gas Plan Intrastate Only

	Total Cost of Supply Benefits	Total Cost of Supply Expenses	Total Cost of Supply (Benefits Minus Expenses)	Total Cost of Supply per Lifetime MMBtu
Residential	\$17,358,932	\$19,486,780	-\$2,127,848	-\$1.94
Residential New Construction	\$1,097,663	\$931,809	\$165,854	\$2.26
Residential HVAC	\$3,286,165	\$3,502,611	-\$216,447	-\$0.98
EnergyWise Single Family	\$9,937,308	\$13,052,080	-\$3,114,772	-\$5.08
EnergyWise Multifamily	\$1,598,705	\$1,616,105	-\$17,400	-\$0.17
Home Energy Reports	\$1,439,092	\$384,174	\$1,054,917	\$12.31
Income Eligible Residential	\$4,696,757	\$8,148,053	-\$3,451,296	-\$12.01
Income Eligible Single Family	\$1,999,700	\$4,843,565	-\$2,843,865	-\$23.44
Income Eligible Multifamily	\$2,697,057	\$3,304,489	-\$607,431	-\$3.66
Commercial & Industrial	\$29,646,519	\$13,379,559	\$16,266,960	\$8.49
Large C&I New Construction	\$9,976,520	\$2,846,540	\$7,129,980	\$10.84
Large C&I Retrofit	\$16,830,854	\$8,141,435	\$8,689,419	\$8.08
Small Business Direct Install	\$1,798,537	\$1,087,929	\$710,608	\$5.99
C&I Multifamily	\$1,040,607	\$1,303,655	-\$263,048	-\$4.01
Total	\$51,702,208	\$41,014,392	\$10,687,816	\$3.24

Please note that these tables have been prepared using values consistent with the original October 2, 2023 filing to facilitate comparison with the Tables provided in the Company’s response to PUC 2-7.

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PUC 6-5

Request:

Please file an alternative version of Table 10 from Bates page 214 that removes any costs associated with delivered fuels (e.g. fuel costs, avoided GHG compliance costs from oil or propane savings, etc.) from the “cost of supply” columns.

Response:

Please see below for the alternative version of Table 10 from Bates page 214 that removes any costs associated with delivered fuels from the cost of supply. The costs associated with delivered fuels that were removed from the cost of supply are oil avoided costs, propane avoided costs, oil/propane associated carbon (GHG) avoided costs, and oil / propane associated NOx avoided costs.

Benefit/Cost Category	Electric	Electric (RI Only)	Natural Gas	Natural Gas (RI Only)
Electric Energy	\$51,762,507	\$33,640,472	\$337,539	\$274,416
Electric Generation	\$4,677,854	\$4,677,854	\$124,249	\$124,249
Electric Transmission Capacity	\$9,998,148	\$1,060,916	\$248,242	\$19,012
Electric Distribution Capacity	\$15,564,462	\$15,564,462	\$282,031	\$282,031
Natural Gas	-\$537,276	-\$537,276	\$28,377,765	\$28,377,765
Delivered Fuel	\$0	\$0	\$0	\$0
Price Effects	\$26,742,586	\$26,742,586	\$378,042	\$378,042
Non-Embedded GHG	\$26,312,297	\$26,312,297	\$19,820,251	\$19,820,251
Non-Embedded NOx	\$421,582	\$421,582	\$2,389,919	\$2,389,919
Reliability	\$139,395	\$139,395	\$1,010	\$1,010
Income Eligible Rate Discount	\$76,203	\$76,203	\$0	\$0
Arrearages	\$32,064	\$32,064	\$0	\$0
Utility NEI	\$115,675	\$115,675	\$35,514	\$35,514
Cost of Supply	\$135,305,498	\$108,246,231	\$51,994,562	\$51,702,208
Program Implementation Exp.	\$92,229,404	\$92,229,404	\$33,255,011	\$33,255,011
Customer Contribution	\$17,495,754	\$17,495,754	\$6,854,409	\$6,854,409
Shareholder Incentive	\$4,079,089	\$4,079,089	\$904,972	\$904,972
Cost of EE	\$113,804,247	\$113,804,247	\$41,014,392	\$41,014,392
Difference	\$21,501,251	-\$5,558,016	\$10,980,170	\$10,687,816

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Please note that these tables have been prepared using values consistent with the original October 2, 2023 filing to facilitate comparison with Table 10 in that filing.

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PUC 6-6

Request:

Do the results of the electric Rate and Bill Impact Model presented in Attachment 7 of Schedule B reflect, in part, any cost reductions from avoided oil or propane usage, or do the results only reflect cost reductions from avoided electric energy usage?

Response:

The results of the electric Rate and Bill Impact Model analysis presented in Tables 12 and 13 in Section 2.3 of Attachment 7 in Schedule B reflect delivered fuel bill impacts and total bill savings, respectively, from avoided delivered fuel usage for Residential and Income Eligible program participants.

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PUC 6-7

Request:

Has the Company performed any studies or evaluations of actual usage profiles and the resulting electric energy consumption of residential heat pumps in Rhode Island? If yes, did the Company's study effort address how heat pump usage profiles change depending on whether a backup heating system is left in place, the heating fuel of that backup system, fuel price differentials, etc.? If the answer to these questions is no, please estimate the cost of performing a study or evaluation to study the actual usage profiles of heat pumps in Rhode Island, including an evaluation of how usage profiles change depending on whether customers retain their backup heating system and the different economics of heating with electric fuel vs. non-electric backup fuel.

Response:

No, the Company has not performed any studies or evaluations of actual usage profiles and the resulting electric energy consumption of residential heat pumps in Rhode Island.

The estimated cost of performing a study or evaluation to study the actual usage profiles of heat pumps in Rhode Island, including an evaluation of how usage profiles change depending on whether customers retain their backup heating system and the different economics of heating with electric fuel vs. non-electric backup fuel would be approximately \$0.8M to \$1.0M. This estimate of study cost was based on similar heat pump metering research performed in Massachusetts and Connecticut.

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PUC 6-8

Request:

In response to PUC 3-22, the Company shows that the pre-weatherization contingency budget for the electric Income Eligible Single Family Program was \$186,206 in 2023 and is planned to be \$290,809 in 2024. The Company also explains that the budget is calculated as a flat 2% of the electric Income Eligible Single Family Program incentive budget. The increase from \$186,206 to \$290,809 represents a 56% year-over-year increase. Did the electric Income Eligible Single Family Program incentive budget increase 56% from 2023 to 2024? If not, why did the pre-weatherization contingency budget increase by that amount?

Response:

Please refer to the Company's corrected response to data request PUC 1-53 which states: "The Income Eligible program maintains a contingency budget of 2% of the total incentive budget to accommodate program deferrals. For 2024 electric, this comes out to \$190,071.36 for the Income Eligible Single Family program."

The electric Income Eligible Single Family Program incentive budget increase from \$186,206 in 2023 to \$190,071 in 2024 represents a ~2.08% year-over-year increase and is due to an increase in the incentive budget. The figure remains 2% of the total incentive budget.