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Also admitted in Massachusetts

December 3, 2024

VIA HAND DELIVERY AND ELECTRONIC MAIL

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 24-39-EE – 2025 Annual Energy Efficiency Plan
Responses to Rhode Island Public Utilities Commission’s
Third Set of Data Requests**

Dear Ms. De La Rosa:

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

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3359.

Sincerely,



Steven J. Boyajian

Enclosure

cc: Docket 24-39-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 3, 2024

Date

**Docket No. 24-39-EE – Rhode Island Energy’s 2025 Energy Efficiency Plan
Service list updated 11/22/2024**

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PUC 3-1

Request:

Referencing Slide 9 of the Company's presentation to the EERMC on November 21, 2024, titled "Energy Efficiency Equity Metrics," please address the following:

- a. Please explain what a "Knob & Tube Wiring Sign-Off" pre-weatherization barrier is.
- b. Please explain the difference between "Knob & Tube Wiring Sign-Off - Rise" and "Knob & Tube Wiring Sign-Off – ICC."
- c. Please explain what a "Knob & Tube Wiring" pre-weatherization barrier is.
- d. Please confirm whether the number of barriers included in the "Knob & Tube Wiring" category are also included in the "Knob & Tube Wiring Sign-Off - Rise" and "Knob & Tube Wiring Sign-Off – ICC" totals. (i.e., is there any double counting between these categories.)

Response:

- a. "Knob & Tube Wiring Sign-Off" is selected when there is a high degree of confidence from the energy specialist that the knob and tube (K&T) is not active/live, and therefore only needs a sign off from a licensed electrician to verify the K&T is not active to proceed. Any home with evidence of K&T requires a sign off from an electrician prior to weatherization work being done.
- b. "Knob & Tube Wiring Sign-Off - Rise" is used when no access points need to be cut into or opened for further investigation of the K&T (for example, in a kneewall or attic space). "Knob & Tube Wiring Sign-Off – ICC" was a typographical error and should read "Knob & Tube Wiring Sign-Off – IIC" ("IIC" stands for Independent Insulation Contractor) and this code is used when access cut-ins are required.
- c. "Knob & Tube Wiring" is selected when there is a high degree of confidence that the K&T is active/live, which precludes the ability to provide insulation due to electrical hazards. This option indicates remediation will be required, followed by a sign off from a licensed electrician to verify the K&T is not active to proceed.
- d. No, there is no overlap or double counting in the number of barriers listed for these three categories.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-39-EE
In Re: 2025 Annual Energy Efficiency Plan
Responses to Commission's Third Set of Data Requests
Issued November 22, 2024

PUC 3-2

Request:

Please describe the steps that the Company takes to mitigate the pre-weatherization barriers “Knob & Tube Wiring Sign-Off – Rise,” “Knob & Tube Wiring Sign-Off – ICC,” and “Knob & Tube Wiring.”

Response:

To mitigate the pre-weatherization barriers listed, the Company offers a \$250 incentive through the EnergyWise Single Family (EW SF) which is designed to cover the cost of a licensed electrician to certify and sign off that the knob and tube (K&T) is not active/live.

In addition, a HEAT Loan can be used for K&T remediation if the K&T is identified as active.

PUC 3-3

Request:

Please provide a table similar to the table referenced in PUC 4-1 above for income eligible customers.

Response:

Please see Table 1 below for a count of pre-weatherization barriers by barrier type through Q3 2024 for the Income Eligible Single Family (IESF) program. The IESF program categorizes deferrals differently than the EnergyWise Single Family Program as these programs are implemented by different vendors that use different tracking systems and methodologies.

Table 1: Income Eligible Single Family # of Pre-Weatherization Barriers by Barrier Type
YTD Q3 2024

	(a)	(b)
(1)	Deferral Reason	Occurrences
(2)	Mechanical, Electrical or Plumbing Hazards	84
(3)	Roof Issues	62
(4)	Moisture Problems	61
(5)	Mold Issues	55
(6)	Excessive Debris	24
(7)	Friable Asbestos, CO or Other Hazardous Materials Present	20
(8)	Water Drainage Issues	13
(9)	Rodents, Insects or Harmful, Objectionable animals	8
(10)	Raw Sewage or Other Sanitary Problems such as Dead Animals or Feces	6
(11)	Unvented Heater	4

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-39-EE
In Re: 2025 Annual Energy Efficiency Plan
Responses to Commission's Third Set of Data Requests
Issued November 22, 2024

PUC 3-4

Request:

Please provide two tables (one for market rate and the other for income-eligible) showing the number of customers that requested an audit for the last 5 years, the number of those customers that had a “Knob & Tube Wiring Sign-Off” pre-weatherization barrier, the number of those customers that had a “Knob & Tube Wiring” pre-weatherization barrier, and how many of each of those sets of customers had a deferral, and how many were remediated.

Response:

For the EnergyWise Single Family (EW SF) program, please see the data requested in the table below. Please note that the program does not track remediation outright (e.g., “how many were remediated”). Below, the Company has provided the number of audits, the number of audits with knob and tubing (K&T) sign off, the number of audits with K&T, and, in lieu of how many were remediated, the Company has provided the number of customers within each of those groups that had weatherization completed.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)
(1)	Audits		Audits w K&T Sign Off		Audits w K&T		
(2)	Year	Qty	Qty Wx'd*	Qty	Qty Wx'd	Qty	Qty Wx'd
(3)	2024 (through Q3)	8,594	2,353	1,441	336	1,012	157
(4)	2023	12,495	4,657	1,500	582	1,440	340
(5)	2022	9,794	3,607	955	444	1,996	596
(6)	2021	11,333	4,746	607	296	2,322	746
(7)	2020	9,926	5,243	432	233	1,798	676

** Wx'd is short for weatherization in this table.*

The Income Eligible Single Family (IE SF) program does not specifically track “K&T Wiring Sign-Off” or “K&T Wiring” pre-weatherization barriers. Those are categorizations used by RISE in the EnergyWise Single Family (EW SF) program. The IE SF and EW SF programs are implemented by different vendors and adhere to different pre-weatherization tracking and remediation processes. Therefore, these programs do not share a uniform set of deferral and pre-

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-39-EE
In Re: 2025 Annual Energy Efficiency Plan
Responses to Commission's Third Set of Data Requests
Issued November 22, 2024

PUC 3-4, Page 2

weatherization barrier categories. As such, the Company is not able to provide the data requested for the IE SF program. Please reference the Company's response to PUC 3-3 for the list of pre-weatherization barriers that are tracked in the IE SF Program.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 24-39-EE
In Re: 2025 Annual Energy Efficiency Plan
Responses to Commission's Third Set of Data Requests
Issued November 22, 2024

PUC 3-5

Request:

Please provide a chart showing the annual amount budgeted and actually spent to remediate pre-weatherization barriers related to “Knob & Tube Wiring Sign-Off” and “Knob & Tube Wiring” for each of the last 5 years. Please also include columns showing the number of remediations done each year for both “Knob & Tube Wiring Sign-Off” and “Knob & Tube Wiring” and the average cost per remediation.

Response:

For the EnergyWise Single Family (EW SF) program, the Company provides a \$250 incentive to cover the cost of a licensed electrician to sign off and certify that the knob and tube (K&T) is no longer active/live. Note that this is not funding to remediate K&T, as that would cost significantly more. Please see Table 1 below.

Table 1 - EWSF \$250 Barrier Incentive

	(a)	(b)	(c)	(d)	(e)
(1)	Year	\$ Budgeted (Total)	\$ Spent (Actual)	Qty (Actual)	Avg Cost**
(2)	2024 (through Q3)	\$162,500*	\$59,030	243	\$243
(3)	2023	\$155,000	\$66,301	286	\$232
(4)	2022	\$188,700	\$105,579	476	\$222
(5)	2021	\$177,300	\$113,725	537	\$212
(6)	2020	\$161,100	\$30,370	147	\$207

* This value represents the total budget for 2024.

** The average cost here is rounded to the nearest dollar.

The HEAT Loan can be used for a variety of purposes, including towards K&T remediation. The HEAT Loan is budgeted for the entirety of the HEAT Loan; it is not budgeted by sub-use. As such, the Company is unable to provide the amount budgeted for HEAT Loan use for K&T specifically. Table 2 below shows the HEAT Loan amounts spent towards K&T from 2020-2024 (through the third quarter of 2024).

PUC 3-5, Page 2

Table 2 – HEAT Loan Data, 2020-2024, \$ Spent Toward K&T

	(a)	(b)	(c)	(d)
(1)	Year	\$ Spent on K&T	# Loans	Avg Cost per K&T Loan
(2)	2024 (through Q3)	\$253,500	23	\$11,022
(3)	2023	\$283,050	28	\$10,109
(4)	2022	\$304,281	23	\$13,230
(5)	2021	\$333,924	30	\$11,131
(6)	2020	\$273,536	31	\$8,824

As referenced in the Company’s response to PUC 3-4, the Income Eligible Single Family (IE SF) program does not specifically track “K&T Wiring Sign-Off” or “K&T Wiring” pre-weatherization barriers or associated remediations. Those are categorizations used by RISE in the EW SF program.