

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN: REVIEW OF RHODE ISLAND)
ENERGY'S ANNUAL ENERGY)
EFFICIENCY PLAN FOR 2026)**

DOCKET NO. 25-37-EE

**PRE-FILED DIRECT TESTIMONY
OF
PETER GILL CASE**

**SUBMITTED ON BEHALF OF
THE RHODE ISLAND
ENERGY EFFICIENCY AND RESOURCE MANAGEMENT COUNCIL**

NOVEMBER 7, 2025

1 **I. INTRODUCTION**

2

3 **Q. Please state your name, employer and business address.**

4 A. I am Peter Gill Case. I am Principal of Truth Box, Inc. My business address is:
5 500 South Water Street, Providence, RI 02093.

6 **Q. On whose behalf are you testifying?**

7 A. I am testifying as a member of the Rhode Island Energy Efficiency and Resource
8 Management Council (“the Council”), where I am an appointed council member
9 representing expertise in energy design and codes. I am also the vice chair of the
10 Council and a member of the Council’s Executive and Education Committees. In
11 total, I have served for approximately six and a half years.

12 At the outset, I wish to mention Mike Guerard, who, when he was alive, was a
13 tireless advocate of energy efficiency in Rhode Island, and who worked for
14 Optimal Energy, the consultants for the Council. My memory of Mike guides me
15 through challenging times like these; he was a champion of common sense being
16 applied to complex issues, such as what we are testifying about today.

17 **Q: What is your educational background?**

18 A: I hold an BA in Urban Studies from Brown University, an M.Ed from Harvard
19 University and an M.Arch from Rhode Island School of Design.

20

21 **Q: What is your profession?**

22 A: I am an architect and real estate developer. My focus as an architect has always
23 been energy-efficient and sustainable design. Over time, my specialty has evolved
24 to include affordable and energy-efficient residential multi-family buildings,
25 typically found in mixed-use developments in urban sites on vacant or underused
26 land. In one recent project, in which I also played the role as real estate developer,
27 it was deemed beneficial to include the cost of electricity (in all-electric
28 apartments) in the rent while we - the landlord - paid the electric bills. To repeat,
29 in this example, the tenants don’t pay their energy bills, it is included in the rent,

1 and it is a benefit to the landlord to do it this way when the cost is low enough due
2 to a super energy-efficient building envelope. This is one example of how I have
3 chosen to use my professional capacity to explore long-standing problematic
4 issues in search of outcomes that may benefit our economy and society.

5 My professional life has grown to include spending significant amounts of time
6 doing volunteer work, including serving on the Council, a position which is
7 becoming more demanding each year, and as Co-Founder of Equation Campaign,
8 which is one organization in a network of groups working to accelerate the
9 transition in the United States of America to a clean energy economy.

10 As a climate advocate, I have spent time in Texas and Louisiana, working with
11 groups there to protect their air and water from the fossil fuel industry which has
12 expanded greatly since horizontal fracturing became commercially viable. The
13 most astonishing fact I have witnessed in Texas is the large amount of un-
14 combusted methane that leaks or is deliberately vented into the atmosphere every
15 day, and for which companies are rarely cited or fined. I have seen many sites
16 through an optical gas imaging camera that show invisible methane spewing from
17 all sorts of tanks and buildings meant to contain the gas. This is one reason I take
18 great interest in, and await in anticipation for, the findings of the Future of Gas
19 docket, since Rhode Island is particularly dependent on the use of methane to
20 create electricity, and since the Council has the duty to develop and monitor
21 “implementation plans, programs, and standards for energy conservation, energy
22 efficiency, and diversification of energy resources for Rhode Island.” R.I. Gen.
23 Laws § 42-140.1-5(1)-(2); see also Id. at § 42-140.1-3(b)(1).

24 **Q: Have you testified before the Rhode Island Public Utilities Commission?**

25 A: No. This is the first docket in which I have testified to the Commission.
26

27 **Q: What is the purpose of your Testimony in this proceeding?**

28 A: Council members asked me to provide additional context on the Council’s efforts
29 to comply with its legislative charge and purpose as manifested and implicated in

1 this annual plan filing. Specifically, the Council asked me to comment on our
2 priorities for this plan – supporting the mandates of the Act on Climate, setting
3 ambitious goals for customers to save money, increasing participation in
4 underserved communities, and conducting targeted workforce development – as
5 well as comments we received from stakeholders on the plan, the Council’s
6 decision to not endorse the plan and reasons why, a proposal for different savings
7 goals, and additional items relevant to energy efficiency plan development and
8 implementation.

9

10 The Council had an opportunity to review, discuss and provide input on my
11 testimony at our meeting on November 3, 2025. At our meeting, Councilors voted
12 unanimously to support this testimony.

13

14 **II. COUNCIL PRIORITIES**

15

16 **Q: Can you explain the Council’s process for developing its Priorities for the**
17 **2026 Plan (2026 Council Priorities)?**

18 **A:** At its meeting on January 16, 2025, the Council received a presentation from its
19 technical consultant NV5 which provided the starting point for the Council’s
20 development of its Priorities for the 2026 Plan. This presentation was focused on
21 reviewing how priorities are used and reviewing the Council’s priorities for the
22 past energy efficiency plan. During discussion, the Council considered questions
23 such as *“how does the Company decide what measures are considered as energy*
24 *efficiency technologies?”* and *“should the Council move some of the detail for*
25 *priorities (i.e. priority strategies) into their own priority category?”* and *“should*
26 *the Council triage 2025 Plan priorities (and priority strategies) to evaluate what*
27 *true priorities are?”* The main takeaway from this discussion was that most of the
28 content related to the Council’s priorities that were developed for the 2025 Plan
29 were still relevant, but that the Council may benefit from some level of
30 prioritization via ranking priorities, indication of which are baseline expectations

1 versus priorities that require extra effort, and/or identification of priorities to
2 elevate.

3
4 At its meeting on February 20, 2025, the Council received a presentation from
5 NV5 regarding ongoing work to establish the Council's Priorities for the 2026
6 Plan. NV5 reviewed an initial draft of the Priorities which included updates made
7 from the 2025 Plan priorities to form the basis of the 2026 Plan priorities. The
8 Council discussed elevating a few specific priorities to focus on and categorizing
9 the other existing priorities as baseline expectations.

10
11 At its meeting on March 31, 2025, the Council received an updated presentation
12 memo from NV5 that reflected the restructuring of the priorities to include
13 baseline expectations and four core Council priorities for the 2026 Plan. The four
14 core Council priorities included supporting the mandates of the Act on Climate,
15 setting ambitious energy savings goals, increasing participation in underserved
16 communities, and conducting targeted workforce development. The baseline
17 expectations included compliance with Least Cost Procurement (LCP) Standards,
18 incorporating stakeholder input on the 2026 Plan, ensuring an effective and
19 efficient Plan development and review process, justifying programs that exceed
20 the cost of supply but support other areas of the Standards, robust coordination on
21 federal funding opportunities, and updating the carbon accounting methodology
22 used in the 2026 Plan. The Council discussed altering the language of the priority
23 to "set ambitious savings goals" to reflect the goal of achieving ambitious savings
24 for customers to reflect ratepayer concern around high bill costs, redefining sub-
25 components of each priority, and including language that explains why the
26 Council selected each priority.

27
28 At its meeting on April 17, 2025, the Council received a final presentation and
29 memo from NV5 that reflected feedback received in the prior three months of
30 Council discussion. Following the presentation and discussion, the Council voted
31 unanimously to approve its Priorities for the 2026 Plan. These priorities included

1 supporting the mandates of the Act on Climate, set ambitious goals for customers
2 to save money, increase participation in underserved communities, and conduct
3 targeted workforce development.
4

5 **III. STAKEHOLDER COMMENTS**

6

7 **Q: Did the Council receive input from the public on the proposed plan?**

8 A: Yes, we did. Over the past several months the Council received public comments
9 related to RIE's 2026 Plan from stakeholders; more than we have observed in past
10 planning cycles.
11

12 At our August 21, 2025, meeting we heard from Acadia Center, Citizens' Climate
13 Lobby, Climate Jobs RI, Roots 2 Empower, and Green Energy Consumers
14 Alliance in advance of our discussion on RIE's second draft of the 2026 Plan.
15 Representatives from these organizations conveyed concerns about the reductions
16 in proposed energy savings goals, the impacts that reductions would have on the
17 workforce and the State's ability to meet the mandates of the Act on Climate, and
18 the importance of the availability of programs for customers to manage their
19 energy bills. All of these stakeholder concerns aligned with the Council's
20 priorities as stated above.
21

22 At our September 25, 2025, meeting, we heard from Acadia Center, Citizen's
23 Climate Lobby, the Northeast Energy Efficiency Partnership, and the American
24 Council for an Energy Efficiency Economy (ACEEE) who reiterated the concerns
25 they shared in August. One comment in particular that we took note of was
26 ACEEE's comment that "Rhode Island has long been a leader in energy
27 efficiency to the great benefit of its customers" and that scaling back on energy
28 efficiency is not "what's called for in this moment, when maintaining or
29 increasing energy efficiency is needed now to address both load growth and
30 customer energy affordability." We also received a letter from House Speaker K.
31 Joseph Shekarchi and Majority Leader Christopher Blazewski and a separate

1 letter from 37 members of the House of Rhode Island Representatives and 18
2 members of the Rhode Island Senate, which was read aloud by Representative
3 Jennifer Boylan of House District 66. These letters from elected officials made
4 clear their opposition to proposed reductions in the energy efficiency programs.
5 They are responding to their constituents' voices in favor of maintaining current
6 levels of savings goals in energy efficiency. Here again, these stakeholder
7 concerns are well aligned with all of the Council's repeatedly stated, transparent
8 priorities for this plan. What is remarkable to us about the response is that these
9 same constituents are also voicing concerns about the high cost of energy. Clearly
10 the Council is not alone in understanding that a more robust energy efficiency
11 program is compatible with addressing the high cost of energy, now and in the
12 future.

13 14 **IV. COUNCIL VOTE AND REASONS**

15
16 **Q: Please describe the Council's vote on Rhode Island Energy's 2026 Plan.**

17 **A:** At its meeting on September 25, 2025, the Council unanimously voted to not
18 endorse the Company's 2026 Plan. Our primary concern was around the decrease
19 in savings goals and associated investment in energy efficiency compared to what
20 was planned and approved for 2025. We were also concerned about scaling back
21 one of the few tools that is consistently available to help customers manage their
22 energy usage at a time when energy prices are high and the signal that scaling
23 back might send to the market delivering these services. As highlighted earlier in
24 my testimony, the Council also received a number of comments from regional and
25 national experts in energy efficiency and letters from elected officials who did not
26 support the proposed cuts to the energy efficiency programs. We cannot, in good
27 conscience, settle for this plan.

28
29 Despite its vote not to endorse the Plan, the Council joined the RI Office of
30 Energy Resources (OER) in support of the administrative efficiencies that RIE
31 proposed. We are not in favor of lowering administrative costs simply to have a

1 reduced budget, but we support continued pursuit of administrative efficiencies
2 that do not impede RIE's ability to deliver planned savings and benefits.

3
4 Thus, the Council discussed a modest increase in the savings goals at the
5 September meeting. We contend there is room in the 2026 plan for the Company
6 to be more ambitious while still allowing for a reduction in the systems benefit
7 charge. That said, at our September 25 meeting we learned that RIE was not open
8 to compromise on its proposed plan for 2026. We are left with a plan that does not
9 meet the interests of the stakeholders we represent.

10

11 **Q: Is there any more context you wish to share related to the Council's**
12 **perspective as it relates to the energy efficiency plan development process?**

13 A: This is the third year we have been working with RIE as the administrator of the
14 Energy Efficiency plan. The Council approved RIE's first two annual plans, and
15 this year we decided not to endorse the plan. Nearly all the members of the
16 Council wanted to give the RIE energy efficiency team some time to get up-to-
17 speed, mostly because the staff we engage with are collegial and intelligent, and
18 we all had hopes that the plans would increase in savings and effectiveness the
19 more time RIE became familiar with program implementation. The Council is
20 fully aware of the challenge facing the program to increase benefits in the "post-
21 lighting" phase. In the past two years, we have worked to support RIE by
22 identifying alternative ways to overcome one of the highest hurdles, namely the
23 steps to weatherization of our building stock. The Council has expertise in this
24 critical topic and is in a position to help RIE to better serve the stakeholders we
25 represent.

26

27 When RIE took over from National Grid it felt like we were getting a "fresh start"
28 with these programs, which was exciting for me as a Council member. However,
29 after reviewing the 2026 plan, which includes significant reductions in savings for
30 Rhode Islanders, and having witnessed two years of mixed results since RIE took
31 over, and after being told that RIE would not modify the 2026 plan proposal, the

1 Council resolved that we needed to do what was possible to push the program
2 towards greater achievable savings now and in the future. We have set our
3 priorities and listened to the chorus of stakeholders and research that defend a
4 robust and growing energy efficiency program as being a vital component in
5 saving ratepayers money and being in step with the mandates of the Act on
6 Climate. In the technical study of the Future of Gas docket, the Commission’s
7 consultant E3 notes that “to achieve the Act [on Climate], all scenarios rely on
8 significant energy efficiency measures, such as building shell retrofits, that far
9 exceed the State’s rate of adoption today.”¹ It is a Council priority to support an
10 energy efficiency plan that meets the mandates of the Act on Climate. It is also a
11 requirement of the Act on Climate that we do so (R.I. Gen. Laws § 42-6.2-8).
12 Beyond climate compliance, E3’s report illustrates that the built capacity of our
13 energy system is only used during periods of high demand and emphasizes the
14 importance of load flexibility strategies like demand side management and energy
15 efficiency in mitigating peak load growth and reducing need for infrastructure
16 investments that drive up energy costs.² We disagree with RIE about whether the
17 proposed plan is the right plan. We are compelled to seek any and all achievable
18 savings each year.

19

20 V. ADDITIONAL SAVINGS PROPOSAL

21

22 **Q: In your testimony about the Council’s decision to not endorse the 2026 Plan,**
23 **you mentioned that the Council contends there is room for the Company to**
24 **be more ambitious. Can you elaborate what you mean by this?**

25 **A:** The Council worked with NV5 to better fulfill our priorities and our powers and
26 duties established by the least cost procurement law by scaling up the 2026 Plan
27 saving by 15 percent across the electric portfolio. Simultaneously, we estimated

¹ Rhode Island Investigation into the Future of the Regulated Gas Distribution Business – Technical Analysis Report, Docket 22-01-NG, April 2024, pg. 12, available online at:

<https://apexanalytics.egnyte.com/fl/04Tdzqfvl#folder-link/Future%20of%20Gas%20Documents/Reports?p=46286d24-f7f2-4d79-a551-6be19cf4bf5>

² *Id.* at pp. 108, 6, 50.

1 the impact on the average ratepayer’s monthly bill as we scaled the electric
2 savings goals. NV5 presented this as a “Hypothetical Plus Plan” to the Council at
3 the September meeting as a way of showing what the impact of an increased level
4 of savings would be and to be responsive to stakeholder concerns and requests for
5 an alternative proposal.

6
7 Following the Council’s decision to not endorse the plan, we worked with NV5 to
8 go beyond the linear scaling exercise described above to help us identify specific
9 areas where savings goals could be increased. NV5 presented the outcomes of its
10 analysis at our meeting on October 16, 2025.

11
12 **Q: What are the changes that the Council proposes?**

13 A: The Council proposes and requests that the Commission approve a savings goal
14 of ~~557,735~~557,620 lifetime MWh for the electric portfolio and 2,229,682 lifetime
15 MMBtu for the gas portfolio and direct RIE to refile its plan with updated electric
16 and gas tables accordingly. Please refer to pre-filed testimony of Craig Johnson
17 and Adrian Caesar (members of the Council’s technical consulting team) for
18 detail on how these savings numbers were developed, as well as their estimates of
19 the additional budget that would likely be required, and the impact it would have
20 on the systems benefit charge and a typical residential customers’ monthly bill.
21 As documented in their testimony, the incremental savings identified have a cost
22 per unit of lifetime energy saved that is lower than the plan as currently filed. The
23 Council had the opportunity to review this analysis and support the associated
24 testimony.

25
26 The Council is offering this to the PUC for consideration – based on the
27 chairman’s suggestion at the hearings last year - an alternative that, while not
28 fully aligning with the 2025 goals, represents a meaningful step in that direction.

29
30 This proposal reflects a pragmatic approach: it acknowledges the regulatory and
31 evidentiary challenges of putting forward an alternative that would maintain the

1 2025 savings goals in this docket, while still advancing a more ambitious and
2 impactful path than the utility's filed plan. Our intent is to provide a constructive
3 option that is consistent with the Council's legislative charge and priorities, is
4 responsive to feedback we received from stakeholders and elected officials, keeps
5 us on track toward our long-term energy efficiency and climate goals and better
6 serves Rhode Island ratepayers.

7

8 **VI. ADDITIONAL COMMENTS ON OUR PLAN REVIEW PROCESS**

9

10 **Q: Does the Council have any concerns about its capacity to administer the**
11 **programs over which it has authority?**

12 **A:** In its review of the 2025 plan, the Commission noted that it may have the
13 authority to approve a three-year plan and asked the Company how difficult it
14 would be for them to develop a three-year plan instead of an annual plan for the
15 Commission to consider for 2026. The Commission clarified that it would want to
16 understand the difficulty of adjusting the framework before requesting that the
17 Company do so. The Company stated that it supported the adoption of a
18 framework for binding three-year plans as opposed to annual plans but would
19 want to discuss considerations with other stakeholders.

20

21 The Council supports and requests a binding three-year plan, similar to what is
22 currently done in Massachusetts and Connecticut, instead of annual plans. The
23 Councilors discussed this matter both at the time that LCP Standards were last
24 reviewed in Docket 23-07-EE, and more recently as a follow-up to discussions
25 that took place during Docket 24-39-EE. A logical starting place for this
26 discussion would be in consideration of updated LCP Standards. Pursuant to R.I.
27 Gen. Laws § 39-1-27.7(a), the LCP Standards must be reviewed not less
28 frequently than every three years. Given that the Commission last reviewed the
29 LCP Standards in 2023 in Docket 23-07-EE and adopted the currently applicable
30 version on July 27, 2023, the LCP Standards will need to be reviewed in the first
31 half of 2026. We recommend opening a Docket related to this required review

1 early in 2026 with the goal of adopting any updates – including those that may be
2 related to developing, reviewing, and approving a binding three-year plan – by no
3 later than the end of the first quarter of 2026.

4
5 The Council believes that moving to a binding three-year plans would allow all
6 parties engaged in this important process to be more effective and efficient in
7 their respective roles of developing, implementing, approving, and overseeing the
8 energy efficiency programs and the benefits they deliver to Rhode Islanders. Too
9 much of our collective resources and expertise are used in overseeing an annual
10 plan cycle. It feels like we are on a “hamster wheel” spending our time and energy
11 completing the task only to see it come around again too soon.

12
13 **Q: What is the Council’s outlook on high energy bills?**

14 A: High energy bills have always been a concern, and this year we’ve seen even
15 greater public distress as rates rise across the region. We know this is a real
16 struggle for Rhode Islanders, and the Council is empathetic to these challenges.
17 We keep this issue top of mind and discuss it regularly at our meetings.

18
19 Energy efficiency is one of the most effective tools we have to help residents and
20 businesses manage rising costs. Under the structure of the Least Cost Procurement
21 law, efficiency investments cost less than supply and deliver real savings. For
22 more than 20 years, regional energy demand has remained stable largely because
23 of leading investments in efficiency. The Council would welcome a strategic
24 conversation about how we can work together to address high energy rates and
25 help Rhode Islanders manage their bills. Additional state and federal funding for
26 efficiency would go a long way toward achieving these shared goals.

27
28 **Q: Does the Council have additional comments about RIE’s performance
29 incentive?**

30 A: Yes, we note that the performance incentive that RIE earned in 2024 (~\$147,000)
31 was the lowest it had received in recent history. For reference, RIE received a

1 performance incentive of \$3,545,379 in 2022³ and \$2,809,527 in 2023⁴. We are
2 concerned that as a result of significantly reducing its savings goals for 2026, RIE
3 may be able to earn a significantly higher shareholder incentive for its
4 performance in 2026 than it earned in 2024 for a similar level of performance.

5

6 VII. CONCLUSION

7

8 **Q: Please summarize your testimony.**

9 A: Regarding the 2026 Energy Efficiency Plan, the Council has heard a strong
10 response from stakeholders in defense of energy efficiency programs in our state,
11 and against reductions in savings levels for 2026. The Council seeks improved
12 savings in the 2026 energy efficiency plan as outlined in our testimony and
13 requests the Commission order RIE to modify the current plan proposal
14 accordingly.

15

16 In addition, the Council reminds the Commission of our support of adopting a
17 binding 3-year planning process, consistent with the approach of our two
18 neighboring states, in order to make the energy efficiency process less time-
19 consuming for all parties involved, and less expensive for ratepayers.

20

21 The best way to lower energy bills is to use less energy. There are multiple factors
22 contributing to the recent steady rise of electric and gas rates, and much debate
23 about these reasons. We believe that energy efficiency is low on the list of
24 contributing factors and that it remains a critical tool for managing long-term
25 costs, which is why the Council is committed to ensuring that ratepayer funds are
26 used responsibly. The Council will continue to monitor ratepayer funds frugally
27 and effectively in this challenging era in which 3rd-party administrators of energy

³ Sum of electric and gas earned performance incentives and service quality adjustments from RIE's 2022 Year-End Report, available at: https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-02/5189-RIE-Update-Yr-EndRept_1-30-24.pdf. See Attachment 1, pg. 8 and Attachment 2, pg. 7.

⁴ Sum of electric and gas earned performance incentives and service quality adjustments from RIE's 2023 Year-End Report, available at: [22-33-EE-Energy Efficiency - Second Corrected 2023 Year-End Report - PUC 6-6-25.pdf](#). See pg. 30.

1 efficiency programs are having to chart a new course in the post-lighting world.
2 Progress in developing an energy efficiency portfolio that meets current
3 challenges combined with other strategies, such as improved demand response
4 programs, increased grid flexibility and reducing our dependence on methane as a
5 fuel source, will reduce upward pressures on energy prices and steer our state
6 towards the mandates of the Act on Climate. We expect to look back on this
7 moment and know we did our best to prepare ourselves for economic prosperity
8 in a fossil fuel-free future.

9

10 **Q: Does this conclude your testimony?**

11 **A:** It does.