

**BEFORE THE  
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**

**OCTOBER 17, 2025**

1 **I. INTRODUCTION**

2  
3 **PETER GILL CASE**

4 **Q. Please state your name and agency address.**

5 A. I am Peter Gill Case. My business address is: 500 South Water Street, Providence,  
6 RI 02093

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

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

13 **Q: Please summarize your work with the EERMC relevant to your role**  
14 **providing testimony in this docket.**

15 A: As vice chair and a seated member of the Council’s Executive and Education  
16 Committees, I have been directly engaged with the Council’s proposed 2026  
17 budget development process.

18  
19 **Q: What is the purpose of your Testimony in this proceeding?**

20 A: The purpose of my testimony is to describe the process for developing the  
21 EERMC’s proposed budget for 2026 and variances in its 2025 budget and  
22 projected spending. The testimony provided herein is meant to be responsive to  
23 Chapter 6.2.H.b of the LCP Standards which require that the Council “Provide  
24 testimony, reasonable documentation, and justification for the budget level to  
25 support a Commission allocation of the requested amount. The budget must  
26 reflect reasonable costs, be reasonably needed to carry out its duties, and be  
27 reasonably related to the expense types identified in the statute.”

28  
29

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

2 A: I hold an BA in Urban Studies from Brown University, an M.Ed from Harvard  
3 University and an M.Arch from Rhode Island School of Design  
4

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

6 A: I am principal of Truth Box Architects in Providence where I have worked for  
7 twenty-three years. I am also a real estate developer with my partner of fifteen  
8 years, Jordan Durham of Barrington.  
9

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

11 A: No. This is my first time providing testimony to the Commission.  
12

## 13 **II. 2026 EERMC BUDGET DEVELOPMENT**

14

15 **Q: Can you please provide a description of the Council's process for developing  
16 its 2026 budget?**

17 A: The Council began its process for developing its 2026 budget at its June 26, 2025  
18 Council meeting. At that meeting, the Council received a presentation from the  
19 Office of Energy Resources (OER) (Exhibits 1 and 2)<sup>1</sup> with a brief overview of  
20 the 2025 budget planning process and expected timeline for 2026. These  
21 discussions continued at the July 17, 2025 Executive Committee meeting (Exhibit  
22 3)<sup>2</sup> and full Council meeting (Exhibit 4)<sup>3</sup>. At the July 17, 2025 Council meetings,  
23 the Council received a presentation (Exhibit 5) and memo (Exhibit 6) from OER  
24 staff on considerations for its 2026 budget. The presentation covered a refresher  
25 on the Council's budget planning timeline, a review of the Council's 2025 budget  
26 and spending to-date as a starting point, and some initial suggestions for the 2026  
27 budget. The memo included proposed budget levels by category, a description of

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<sup>1</sup> See Section 7a in Exhibit 2

<sup>2</sup> See Section 6b in Exhibit 3. Note that this portion of the meeting was conducted during Executive Session so documentation of discussion of the Executive Committee are not detailed in the minutes

<sup>3</sup> See Section 7a in Exhibit 4

1 each budget category, detail on OER’s proposed budget level, and a summary of  
2 the statutory authority for supporting each budget category.

3  
4 At this stage, OER proposed four (4) potential changes to the 2025 budget for the  
5 2026 budget proposal. These included (1) reduction of \$17,025 for the Council’s  
6 consultant services, (2) reduction of \$5,000 for legal services, (3) increase of  
7 \$8,750 for the Community of Practice and Lecture Series Public Education  
8 activities, and (4) removal of funding for the Council’s Energy Efficiency and  
9 Climate Awareness Campaign. After proposed modifications, the total draft  
10 amount for the Council’s 2026 budget was \$891,900, which represented a 9%  
11 decrease (\$88,275) from the Council’s 2025 budget allocation of \$980,175.

12  
13 Following the presentation, there was some discussion about whether the  
14 upcoming rate case may create additional work for the Council’s consultant and  
15 legal services. Ultimately, the Council unanimously voted (Exhibit 4)<sup>4</sup> to approve  
16 the proposed budget for inclusion in Rhode Island Energy’s anticipated filing with  
17 the Public Utilities Commission (PUC) as part of its 2026 Annual Energy  
18 Efficiency Plan. The Council’s 2026 budget proposal – which reflects the  
19 Council’s vote at the July 17, 2025 meeting – is available for review in Exhibit 7.<sup>5</sup>

20  
21 **Q: What additional steps did the Council take in developing its proposed budget**  
22 **for 2026?**

23 **A:** The Council received a guidance document from the PUC on October 18, 2022  
24 that included requests for the Council to consider when developing its pre-file  
25 testimony in support of its 2023 budget proposal. As it has done in years since,  
26 the Council considered this guidance document in describing the Council’s budget  
27 development process for 2026. The following questions and answers are provided

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<sup>4</sup> See Section 7a in Exhibit 4

<sup>5</sup> This may be reviewed alongside the aforementioned Exhibit 6, which for each category in the Council’s budget proposal, provides a full description of what each item is, how its costs were estimated, and why it is within the Council’s statutory authority.

1 in the order in which they were presented in the aforementioned guidance  
2 document.

3  
4 **Q: Can the EERMC please provide a table that includes budget allocations for  
5 2025, year-to-date spend, year-end forecasted spend, variances between year-  
6 end forecast and planned budget, and proposed budgets for 2026?**

7 A: Please refer to Exhibit 7 which includes for each budget category the following  
8 numbers:

- 9 • 2025 Budget
- 10 • 2025 year-to-date spend
- 11 • 2025 forecasted remaining spend
- 12 • Variances between 2025 forecasted year-end spend and 2025 budget  
13 (dollars and percent)
- 14 • Proposed 2026 Budget
- 15 • Variances between 2026 proposed budget and 2025 budget (dollars and  
16 percent)

17  
18 **Q: Can the EERMC please describe any variances between year-end forecast  
19 and planned budget for 2025 that are greater than plus or minus 10%.**

20 A: There are four items in year-end forecast of the 2025 budget that have variances  
21 of greater than plus or minus 10% from the allocated amount. These are described  
22 below.

- 23 1. Legal Counsel: This item had an allocated budget of \$75,000. At the time of  
24 developing this testimony, the Council's legal representative has indicated  
25 year-to-date spending (paid and invoiced but awaiting payment) of \$30,100.  
26 The Council's legal representative indicated that based on the third quarter of  
27 work from last year, it expects to invoice the Council an additional \$30,000.  
28 This brings the year-end forecasted spend for this item to \$60,100. As a result,  
29 the Council projects that this item will have a variance of negative 19.9%  
30 compared to the 2025 budget.

- 1           2. Annual Report Printing & Distribution: This item had an allocated budget of  
2           \$500. Through the end of September, the Council has incurred \$350 in  
3           expenses and does not anticipate expending any additional funds through the  
4           balance of the year. As a result, the Council projects that this item will have a  
5           variance of negative 30.0% compared to the 2025 budget.
- 6           3. Council Travel & EERMC Councilor Education and Advancement: This item  
7           had an allocated budget of \$900. Through the end of September, the Council  
8           has been invoiced for a total amount of \$219.05. At the time of drafting this  
9           testimony, the Council anticipates an additional \$219.05 to be invoiced for the  
10          period of October through December, which would bring the total for this  
11          item to \$438.10. As a result, the Council projects that this item will have a  
12          variance of negative 51.3% compared to the 2025 budget.
- 13          4. EE and Climate Awareness Campaign: This item had an allocated budget of  
14          \$75,000 for 2025 which would have supported the evolution or continuation  
15          of the work it conducted in 2024. The Council has not spent any of these  
16          budgeted funds and does not expect to do so through the balance of the year.  
17          As a result, the Council projects that this item will have a variance of negative  
18          100% compared to the 2025 budget.

19  
20   **Q:    Can the EERMC please describe any increases in the 2026 proposed budget**  
21   **compared to the 2025 budget allocation?**

22   A:    The Council’s proposed budget for 2026 includes one item that result in an  
23   increase in allocated funding compared to 2025. The Council proposes to increase  
24   the budget for the Community of Practice and Lecture Series public education  
25   activities by \$8,750 from \$91,250 to \$100,000. In 2025, the Council partnered  
26   with the University of Rhode Island Cooperative Extension (URI) to host an  
27   “Efficient Housing for All” Community of Practice.<sup>6</sup> This new initiative is  
28   designed to engage with residents with lived experience and expertise in energy  
29   efficiency policy and public health, to expand knowledge and awareness of

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<sup>6</sup> <https://web.uri.edu/coopext/efficient-housing-for-all/>

1 energy efficiency programs. URI will also be hosting lectures open to the public  
2 on the subject of energy efficiency. The EERMC is seeking to increase this  
3 budget allocation in 2026 to continue this work and promote the energy efficiency  
4 programs through new and growing networks of constituents.

5  
6 **Q: Can the EERMC please describe any decreases in the 2026 proposed budget  
7 compared to the 2025 budget allocation?**

8 A: The Council's proposed budget for 2026 includes three items that result in a  
9 decrease in allocated funding compared to 2025. These are described below.

- 10 1. Consultant Services: The Council proposes to decrease the budget for  
11 Consultant Services by \$17,025 from \$717,025 to \$700,000. Since 2022, the  
12 Council's Consultant Services have not exceeded \$700,000. This reduction  
13 was proposed by OER following its historical review of Consultant Team  
14 spending.
- 15 2. Legal Services: The Council proposes to decrease the budget for Legal  
16 Services by \$5,000 from \$75,000 to \$70,000. Since 2022, the Council's Legal  
17 Services have not exceeded \$70,000. This reduction was proposed by OER  
18 following its historical review of Legal Services spending.
- 19 3. EE and Climate Awareness Campaign: The Council is proposing to eliminate  
20 the budget for the EE and Climate Awareness Campaign. In 2024, the Council  
21 requested \$75,000 for this initiative, which would have been a continuation of  
22 the work conducted in 2024. At the time of the Council's budget preparation  
23 for 2025, the Council was considering continuing with this effort. During  
24 Executive Session at its March 31, 2025 meeting, the Council opted not to  
25 extend the contract for this programming and is not seeking to continue with  
26 this effort at this time. As a result, the Council is seeking to eliminate this line  
27 item, which is a \$75,000 reduction compared to the 2025 budget allocation.

28  
29 **Q: Can the EERMC please describe any new items contained in the 2025  
30 proposed budget, including how the EERMC calculated the estimated  
31 expense associated with each item?**

1 A: The Council is not proposing any new activities or budget allocations for 2026.

2

3 **Q: Can the EERMC provide documentation or explanations regarding its**  
4 **forecasted spend through year-end 2024?**

5 A: There are five items for which the Council has forecasted non-zero remaining  
6 spend in 2025.

7 1. Consultant Services: Assumes a similar level of spending for the final three  
8 months of the year as was billed to the Council for services rendered during  
9 that time period over the past two years.

10 2. Legal Counsel: Projects expected spend for the final three months of the year  
11 based on pending matters including but not limited to proceedings regarding  
12 the 2025 Energy Efficiency Plan.

13 3. Council Travel and EERMC Councilor Education and Advancement:  
14 Assumes that the Council will be invoiced the same amount in hosting fees for  
15 its Fall Learning, Education, and Advancement Discussion (LEAD) Session  
16 meeting (which is scheduled for November 3, 2025) as it was for its Spring  
17 LEAD meeting.

18 4. Community of Practice & Lecture Series: Assumes that invoicing for this  
19 work, which is ongoing, will come through and be paid at the full budget  
20 amount.

21 5. EERMC Website: Assumes that the Council will receive its annual invoice for  
22 hosting its website in Q4 as has historically been the case.

23

24 **Q: Is the EERMC aware that its proposed budget for 2026 exceeds the amount**  
25 **included in Rhode Island Energy's filed 2026 Energy Efficiency Plan?**

26 A: Yes. The Council is aware that its proposed budget for 2026 of \$891,000 exceeds  
27 the amount included for the Council in Tables E-2A and G-2A of Rhode Island  
28 Energy's filing. The amounts included in those tables equals \$829,497.41, which  
29 is \$62,402.59 less than the Council's proposed budget for 2026.

30

1 **Q: What is the EERMC’s understanding of Rhode Island Energy’s reasoning**  
2 **for including an amount that is less than the budget that the EERMC**  
3 **proposed for 2026?**

4 A: The Council’s understanding is that the total value that Rhode Island Energy  
5 included in its 2026 Energy Efficiency Plan filing was based on R.I. General  
6 Laws § 39-2-1.2 sub-sections (i)<sup>7</sup> and (j)<sup>8</sup> which states that the Council is eligible  
7 to receive no more than 40% of 3% of the funding required to support electric and  
8 gas energy efficiency and system-reliability programs proposed by Rhode Island  
9 Energy and approved by the Public Utilities Commission (“the statutory  
10 maximum”). On the basis of the filing in this Docket alone, the Council believes  
11 this number is accurate.

12  
13 **Q: Are there programs beyond those considered in this Docket that the EERMC**  
14 **believes should be considered in the calculation of the statutory maximum it**  
15 **is eligible to receive?**

16 A: The Council’s understanding is that the statutory maximum that it is eligible to  
17 receive should be based on both energy efficiency programs and system reliability  
18 procurement (SRP) plans and investment proposals. Prior to the most recent  
19 update to the Least Cost Procurement Standards (LCP Standards) in 2023 (Docket  
20 23-07-EE), this maximum would have also included Rhode Island Energy’s SRP

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<sup>7</sup> R.I. General Laws § 39-2-1.2.(i) states: “Effective January 1, 2007, the commission shall allocate, from demand-side management gas and electric funds authorized pursuant to this section, an amount not to exceed three percent (3%) of such funds on an annual basis for the retention of expert consultants, and reasonable administration costs of the energy efficiency and resource management council associated with planning, management, and evaluation of energy-efficiency programs, renewable energy programs, system reliability, least-cost procurement, and with regulatory proceedings, contested cases, and other actions pertaining to the purposes, powers, and duties of the council, which allocation may by mutual agreement, be used in coordination with the office of energy resources to support such activities.”

<sup>8</sup> R.I. General Laws § 39-2-1.2.(k) states: “Effective January 1, 2016, the commission shall annually allocate from the administrative funding amount allocated in subsection (i) from the demand-side management program as described in subsection (i) as follows: (1) for the energy efficiency and resource management council, no more than forty percent (40%) for the purposes identified in subsection (i) and (2) sixty percent (60%) of three percent (3%) from the demand-side management gas and electric funds annually to the office of energy resources for activities associated with planning, management, and evaluation of energy-efficiency programs, renewable energy programs, system reliability, least-cost procurement, and with regulatory proceedings, contested cases, and other actions pertaining to the purposes, powers, and duties of the office of energy resources and shall have exclusive authority to direct the use of the office administrative and programmatic funds.”

1 Plans and Active Demand Response programs (commonly known as Connected  
2 Solutions). Since the Connected Solutions programs are now filed separately from  
3 the energy efficiency plans as SRP Investment Proposals, they have not been  
4 accounted for in the total statutory maximum that is applicable to the Council as  
5 contemplated in R.I. General Laws § 39-2-1.2 sub-sections (i) and (j).  
6

7 **Q: What does the Council believe should be the statutory maximum in 2026?**

8 A: In Rhode Island Energy’s filing for its SRP Investment Proposal for its 2024-2026  
9 Electric Demand Response programs<sup>9</sup> in Docket 24-06-EE, the Company  
10 included a statutory maximum in the amount of approximately \$123,600<sup>10</sup> for the  
11 Council for 2026. In its Order<sup>11</sup> on this Docket, the Commission “*directed the*  
12 *Company to remove any regulatory allocation to the EERMC from its budgets, as*  
13 *the EERMC is already collecting its previously approved energy efficiency budget*  
14 *in full.*”<sup>12</sup> This was true at the time and the Council does not contest that ruling.  
15 However, because the Council’s proposed budget for 2026 exceeds the statutory  
16 maximum of the energy efficiency programs alone (despite a reduction of 9%  
17 compared to 2025), it is raising for consideration whether a portion of those funds  
18 could be allocated to the Council to cover the funding gap for 2026 that otherwise  
19 exists. If considered alongside the energy efficiency programs proposed in this  
20 Docket as we believe is appropriate, the Council’s statutory maximum would be  
21 approximately \$953,097. Considered from this perspective, the Council’s  
22 proposed budget for 2026 is approximately \$62,000 less than the statutory  
23 maximum.  
24  
25  
26

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<sup>9</sup> [https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-02/2406-RIE-SRPInvest2024-2026-bates\\_2-8-24.pdf](https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2024-02/2406-RIE-SRPInvest2024-2026-bates_2-8-24.pdf)

<sup>10</sup> Ibid., Bates 103

<sup>11</sup> PUC Order 25306, available at: <https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2025-04/Docket%2024-06-EE%20RIE%20SRP-EDR%2024-26%20Ord25306.pdf>

<sup>12</sup> Ibid., pg. 5.

1 **Q: What approval is the EERMC seeking as it relates to its proposed budget for**  
2 **2026?**

3 A: The Council is seeking approval of its proposed 2026 budget based on the  
4 findings provided in this testimony.  
5

6 **Q: Please summarize the testimony you have provided.**

7 A: The purpose of my testimony was to describe the EERMC's process for  
8 developing its proposed budget for 2026. My testimony includes responses to  
9 specific prompts which were included in a guidance document provided by the  
10 PUC. The testimony provided throughout is meant to be responsive to Chapter  
11 6.2.H.b of the LCP Standards which require that the Council "Provide testimony,  
12 reasonable documentation, and justification for the budget level to support a  
13 Commission allocation of the requested amount. The budget must reflect  
14 reasonable costs, be reasonably needed to carry out its duties, and be reasonably  
15 related to the expense types identified in the statute." My testimony concludes  
16 with a discussion around the process for determining the maximum statutory  
17 allocation that the Council is subject to and a request of the Commission to  
18 approve the Council's 2026 budget as proposed based on the findings provided in  
19 this testimony.  
20

21 **Q: Does this conclude your testimony regarding the EERMC's budget?**

22 A: It does.