# \* OF RHODE GAR

# State of Rhode Island and Providence Plantations

## DEPARTMENT OF ATTORNEY GENERAL

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Patrick C. Lynch, Attorney General

March 30, 2007

# By Electronic and Regular Surface Mail

Luly Massaro, Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888

> Re: National Grid Gas Energy Efficiency Programs – Commission Docket No. 3790

Dear Ms. Massaro:

Enclosed for filing in the above-captioned proceeding are an original and nine (9) copies of the testimony of Mr. Timothy Woolf, Vice President of Synapse Energy Economics, Inc., on behalf of the Division of Public Utilities and Carriers. Copies of this letter and its enclosure will be filed with you electronically, and provided to all persons on the service list for this docket.

Very truly yours,

William K. Lueker (R.I. Bar No. 6334) Special Assistant Attorney General

Willia K. Luckar

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Encl.

cc: Servic List PUC Docket No. 3790

# **BEFORE THE**

# STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID GAS	)	
FNFRGY FFEICIENCY PKUGKAMS	)	DOCKET NO. 3790

**Direct Testimony of** 

**Timothy Woolf** 

On Behalf of

The Division of Public Utilities and Carriers

Regarding National Grid's

**Gas Energy Efficiency Programs** 

March 29, 2007

1	Q.	What is your name, position and dusiness address:
2	A.	My name is Timothy Woolf. I am the Vice-President of Synapse Energy
3		Economics, Inc., 22 Pearl Street, Cambridge, MA 02139.

- 4 Q. Please describe Synapse Energy Economics.
- 5 A. Synapse Energy Economics is a research and consulting firm specializing in
- of clients, with an emphasis on consumer advocates, regulatory commissions, and environmental advocates.

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- 9 Q. Please describe your experience in the area of utility regulation, and in particular energy efficiency.
- My experience is summarized in my resume, which is attached as Exhibit TW-1. In 11 Α. my current position at Synapse, I investigate a variety of issues related to electric 12 and gas utility regulation and planning; with a focus on energy efficiency, 13 renewable resources, air quality, environmental policies, and many aspects of 14 consumer protection. Since 1987 my work has covered all aspects of energy 15 efficiency program design and implementation, including efficiency measure 16 assessment, program delivery options, program budgeting, cost-benefit analyses, 17 utility performance incentives and other relevant regulatory policies. 18
- Q. Please describe your professional experience before beginning your current position at Synapse Energy Economics.
- 21 A. Before joining Synapse Energy Economics, I was the Manager of the Electricity
  22 Program at Tellus Institute, a consulting firm in Boston, Massachusetts. In that
  23 capacity I managed a staff that provided research, testimony, reports and

- Economics from the London School of Economics, a BS in Mechanical
- 2 Engineering and a BA in English from Tufts University.
- 3 Q. On whose behalf are you testifying in this case?
- 4 A. I am testifying on behalf of the Division of Public Utilities and Carriers (the
- 5 Division).



1 2 .	Q.	Please provide a summary of National Grid's proposed Gas Energy Efficiency Programs.
3	A.	National Grid currently has a gas energy efficiency surcharge of \$0.063 per
4		decatherm, applicable from January through June 2007. The Company is
5		proposing to increase this surcharge to \$0.114 per decatherm, for the period July
6		2007 through December 2008. These surcharges will provide the Company with
7		total revenues of roughly \$7.5 million, for gas efficiency programs to be
8		implemented during the 18-month period of July 2007 through December 2008.
9		National Grid proposes to offer five residential and eight commercial and
10		industrial gas efficiency programs. The programs are intended to address all the
11		key gas end-uses, and to be available to all types of gas customers. In total, the
12		gas efficiency programs are expected to save 198,908 MMBtu per year, and a
13		total of 3,078,531 MMBtu over the lifetimes of the efficiency measures. The
14		program designs are described in Attachments 1 and 2 of the Settlement.
15		Each of the programs is estimated to be cost-effective, with benefit-cost ratios
16		exceeding one. On average, the residential programs are estimated to have a
17		benefit-cost ratio of 3.25, and the commercial and industrial programs are
18		estimated to have a benefit cost ratio of 3.68. The programs are expected to resul-
19		in total benefits of \$22.8 million, and net benefits (after subtracting out costs) of
20		roughly \$16 million. The benefit-cost analysis is presented in Attachment 8 of
21		the Settlement.
22 23	Q.	Please explain why the Division supports the Company's Gas Efficiency Programs.
24	A.	There are many reasons why the Division supports the Company's Gas Efficiency
25		Programs:
26		First, the program funding levels are consistent with the Comprehensive Energy
27		Conservation, Efficiency and Affordability Act of 2006 (2006 Act). The Act
28		allows the Company to implement a surcharge of up to \$0.15 per decatherm.

Both of these figures are in present value dollars.

While the surcharges for 2007 and 2008 are somewhat lower than this maximum 1 amount, they have been set to provide the Company with as much funding as is 2 needed for this initial 18-month period. New energy efficiency programs 3 typically require several years to ramp up to a mature level, and the Company 4 estimates that the proposed budgets are all that they could efficiently spend during 5 this initial ramp-up period. 6 Second, the gas efficiency program budgets are properly balanced across 7 customer classes, where the programs budgets for each sector (residential versus 8 commercial/industrial) are roughly equal to the amount of revenues contributed 9 by the that sector. Furthermore, within the residential sector a considerable 10 portion of the program funds have been dedicated to programs serving low-11 income customers – i.e., the Energy Wise program and the Single Family Low 12 13 Income program. Third, several of the Company's gas efficiency programs are offered through 14 GasNetworks, a regional collaborative of natural gas distribution companies that 15 coordinate natural gas efficiency programs throughout Maine, Massachusetts, 16 New Hampshire and, now, Rhode Island. This is a very sensible approach to 17 offering gas programs in Rhode Island, as it builds upon the experience developed 18 in other states and it creates efficiencies through regional coordination. 19 Fourth, several of the Company's gas efficiency programs are already being 20 provided by KeySpan Energy Delivery (KeySpan). Furthermore, the Company 21 will employ KeySpan staff to assist with the development and implementation of 22 the gas efficiency programs. KeySpan has several years of experience in offering 23 gas efficiency programs in other states, and is recognized as a leader in gas 24 efficiency programs in the region. Again, this is a sensible approach that will 25 increase the effectiveness of the Company's new gas efficiency programs. 26 Fifth, to the extent possible the gas efficiency programs will be coordinated with, 27 and offered in conjunction with, the Company's electric efficiency programs. 28 This coordination will make both the gas and electric programs more effective 29 and more efficient. This coordination is especially important for those programs 30

1		that involve home energy audits (for the residential customers) or technical
2		assessments (for commercial and industrial customers), where all cost-effective
3		energy efficiency improvements can be identified and provided with financial
4		support, regardless of whether the end-use requires electricity or natural gas.
5		Finally, the programs are designed to address all key gas end-uses, and to be made
6		available to all customer types. This is important to ensure that gas efficiency
7		services are comprehensive, and to promote customer equity across the efficiency
8		programs.
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- Q. Does the Settlement include any provisions regarding shareholder incentives
   for energy efficiency activities?
- 11 A. Yes. The proposed shareholder incentive is similar to that which is in place for 12 the National Grid electric efficiency programs. The Company must achieve 60% 13 of the savings goal before it can earn any shareholder incentive, and then it will be

- Q. Does the Division support the shareholder incentive mechanism proposed in the Settlement?
- 3 A. Yes. The Division believes that the shareholder incentive mechanism proposed in 4 the Settlement strikes the appropriate balance between (a) providing the Company
- 5 management with the proper to incentive to conduct successful efficiency
- 6 programs, and (b) maintaining as much of the available efficiency funds as
- 7 possible for the purpose of achieving gas efficiency savings and reducing
- 8 customers' gas bills.
- 9 O. Are there other elements to the Settlement?
- 10 A. Yes. One important additional element pertains to "self-directed" energy
- efficiency programs. The 2006 Act allows the Commission to exempt gas used
- for manufacturing processes from the energy efficiency surcharge where the
- customer has established a self-directed energy efficiency program. The parties to
- the Settlement request that the Commission address this important issue in a
- separate proceeding, in order to ensure that the Company's gas efficiency
- programs are allowed to proceed without delay. The parties to the Settlement
- have developed proposed guidelines for self-directed energy efficiency programs,
- in order to assist the Commission with that separate proceeding. These guidelines
- are provided in Attachment 5 of the Settlement.
- 20 Q. Does this conclude your testimony at this time?
- 21 A. Yes.

22

# **Timothy Woolf**

Vice President
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#### PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. Vice President, 1997-present. Conducting research, writing reports, and presenting expert testimony pertaining to consumer, environmental, and public policy implications of electricity industry regulation. Primary focus of work includes electricity industry regulation and restructuring, electric power system planning, energy efficiency programs and policies, renewable resources and related policies, power plant performance and economics, air quality, and many aspects of consumer and environmental protection.

**Tellus Institute**, Boston, MA. Senior Scientist, Manager of Electricity Program, 1992-1997. Responsible for managing six-person staff that provided research, testimony, reports and regulatory support to consumer advocates, environmental organizations, regulatory commissions, and state energy offices throughout the US.

**Association for the Conservation of Energy**, London, England. Research Director, 1991-1992. Researched and advocated legislative and regulatory policies for promoting integrated resource planning and energy efficiency in the competitive electric industries in the UK and Europe.

Massachusetts Department of Public Utilities, Boston, MA. Staff Economist, 1989-1990. Responsible for regulating and setting rates of Massachusetts electric utilities. Drafted integrated resource planning regulations. Evaluated utility energy efficiency programs.

**Massachusetts Office of Energy Resources**, Boston, MA. Policy Analyst, 1987-1989. Researched and advocated integrated resource planning regulations. Participated in demand-side management collaborative with electric utilities and other parties.

**Energy Systems Research Group**, Boston, MA. Research Associate, 1983-1987. Performed critical evaluations of electric utility planning and economics, including production cost modeling and assessment of power plant costs and performance.

Union of Concerned Scientists and Massachusetts Public Interest Research Group, Cambridge and Boston, MA. Energy Analyst, 1982-1983. Analyzed environmental and economic issues related to nuclear plants, renewable resources and energy efficiency.

#### **EDUCATION**

Masters, Business Administration. Boston University, Boston, MA, 1993. Diploma, Economics. London School of Economics, London, England, 1991. B.S., Mechanical Engineering. Tufts University, Medford, MA, 1982. B.A., English. Tufts University, Medford, MA, 1982.

### **TESTIMONY**

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Feasibilty Study of Alternative Energy and Advanced Energy Efficiency Technologies for Low-Income Housing in Massachusetts, prepared for the Low-Income Affordability Network, Action for Boston Community Development, and Action Inc., with Zapotec Energy, August 2005.

The Cape Light Compact Energy Efficiency Plan: Phase III 2005-2007: Providing Comprehensive Energy Efficiency Services to Communities on Cape Cod and Martha's Vineyard, prepared for the Cape Light Compact, April 2005.

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A Balanced Energy Plan for the Interior West, prepared for the Hewlett Foundation Energy Series, with Western Resource Advocates and Tellus Institute, May 2004.

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The Maryland Renewable Portfolio Standard: An Assessment of Potential Cost Impacts, prepared for the Maryland Public Interest Research Group, March 18, 2003.

The Cape Light Compact Energy Efficiency Plan: Phase II 2003-2007: Providing Comprehensive Energy Efficiency Services to Communities on Cape Cod and Martha's Vineyard, prepared for the Cape Light Compact, with Cort Richardson, the Vermont Energy Investment Corporation, and Optimal Energy Incorporated, March 2003.

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Electricity Restructuring Activities in the US: A Survey of Selected States, prepared for the Arizona Corporation Commission Utilities Division Staff, March 15, 2002.

Powering the South: A Clean and Affordable Energy Plan for the Southern United States, prepared with and for the Renewable Energy Policy Project and a coalition of Southern environmental advocates, January 2002.

Survey of Clean Power and Energy Efficiency Programs, prepared for the Ozone Transport Commission, January 14, 2002.

*Proposal for a Renewable Portfolio Standard for New Brunswick*, prepared for the Conservation Council of New Brunswick, presented to the New Brunswick Market Design Committee, December 12, 2001.

A Retrospective Review of FERC's Environmental Impact Statement on Open Transmission Access, prepared for the North American Commission for Environmental Cooperation, with the Global Development and Environment Institute, October 19, 2001.

Repowering the Midwest: The Clean Energy Development Plan for the Heartland, prepared for the Environmental Law and Policy Center and a coalition of Midwest environmental advocates, February 2001.

Marginal Price Assumptions for Estimating Customer Benefits of Air Conditioner Efficiency Standards, comments on the Department of Energy's proposed rules for efficiency standards for central air conditioners and heat pumps, on behalf of the Appliance Standards Awareness Project, December 2000.

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*Performance-Based Regulation in a Restructured Electric Industry*, prepared for the National Association of Regulatory Utility Commissioners, with Resource Insight, the National Consumer Law Center, and Peter Bradford, February 1998.

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Position Paper of the Vermont Department of Public Service. Investigation into the Restructuring of the Electric Utility Industry in Vermont, Docket No. 5854, Tellus Study No. 95-308, March 1996.

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*Electric Resource Planning for Sustainability*, prepared for the Texas Sustainable Energy Development Council, Tellus Study No. 94-114, February 1995.

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Local Policy Measures to Improve Air Quality: A Case Study of Queens County, New York, Local Environment, Volume 9, Number 1, February 2004.

Future Outlook for Electricity Prices in Massachusetts, guest speaker before the Boston Green Buildings Task Force, December 18, 2003.

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