

Memorandum

To: The Rhode Island Public Utilities Commission

From: Scudder Parker and Mike Guerard, Consultants to the EERMC, on behalf of the EERMC

Date: May 16, 2014

RE: RI PUC Docket # 4443: Response to Proposed Edits to the Least Cost Procurement Standards from the Division of Public Utilities

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General Comments:

The EERMC appreciates and values the comments of the Division of Public Utilities, and believes that the suggestions made will provide additional value to the discussion about revising the Standards.

Mr. Woolf proposes two specific changes to the Standards. Our comments address each separately.

EE Program Plan Filing Dates

The EERMC, OER, and National Grid participants in proposing revisions to the Standards discussed the proposal made by the Division’s Consultant and other options.

The EERMC is not persuaded that this specific change will provide the additional time for PUC review that the Division may be seeking (and that the EERMC understands would be desirable) because of the legislative requirement for a 60-day decision by the PUC.

We suggest that it may be feasible and beneficial to “split the difference” with a mid-October filing date, since this would move the 60-day deadline out of the winter Holiday period. We would recommend that in the years in which a three-year (or EE Procurement Plan”) is filed, the November date be retained.

We understand that National Grid may have comments on the proposal to change the filing date of the “annual Plan” (or EE Program Plan) from Nov. 1 to October 1.

Environmental Compliance Costs

The EERMC appreciates and concurs with the proposal of the Division about Environmental Compliance Costs and agrees that it would be prudent and beneficial for Rhode Island to adopt the proposed revision. This will make practice in Rhode Island consistent with other states in the region.