

## **The Rhode Island Energy Efficiency and Resource Management Council**

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August 24, 2018

VIA ELECTRONIC AND FIRST-CLASS MAIL

Luly E. Massaro  
Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket #4684**  
**EERMC Comments on the PUC's Proposed Revisions to the Least Cost**  
**Procurement Standards**

Dear Luly,

The Rhode Island Energy Efficiency and Resource Management Council ("EERMC") is pleased to submit the following information related to the above-referenced matter. This information is submitted in response to the Rhode Island Public Utilities Commission ("PUC") August 3, 2018 draft language revising the Least Cost Procurement ("LCP") Standards.

As a brief background, in response to the PUC's order to revise the LCP Standards to reflect the methodology for comparing the cost of efficiency with the cost of supply that was included in the final, approved 2018 Energy Efficiency Plan, the EERMC and its Consultant Team engaged in a series of discussions. These discussions reflected the EERMC's important role in supporting stakeholder input.

Based on these discussions, the EERMC submitted revisions to the LCP Standards to the PUC on May 18, 2018<sup>1</sup>. The new language clearly defined "cost of efficiency" and "cost of supply" in a manner consistent with the 2018 Plan. In its submittal, the EERMC also indicated interest in exploring whether or not a single test (i.e., the existing Rhode Island Test) could be used to demonstrate the requirement that efficiency cost less than supply, pending additional stakeholder engagement to review how that best could be undertaken.

We are also in agreement with the comments by the Rhode Island Office of Energy Resources ("OER") and Acadia Center that this represents a departure from the outcome that resulted from our extensive stakeholder discussions. The EERMC believes it is important that any language changes reflect the full input of all stakeholders. The comments submitted to date indicate a need for additional time for stakeholders to discuss the change in direction. The EERMC therefore requests a technical session, or other forum to allow for this, with the objective of having final language approved no later than September 11, 2018 for inclusion in the 2019 Plan filing due October 15, 2018.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me at (401) 477-0023.

Respectfully submitted  
Rhode Island Energy Efficiency  
Resource Management Council  
By its Attorney,



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<sup>1</sup> The proposed changes to the LCP Standards proceeded under the heading of Docket 4684, under which they had originally been approved.



## CERTIFICATION

I hereby certify that I filed ten (10) copies of the within comments and a true copy, via electronic mail, on this 24<sup>th</sup> day of August, 2018, to the below updated Service List for Docket #4684, as per below:

### VIA FIRST CLASS MAIL:

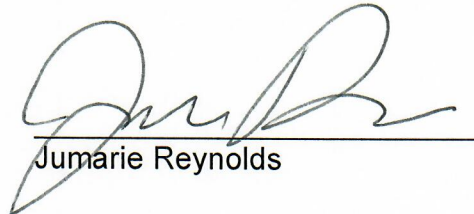
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### VIA ELECTRONIC MAIL:

**Docket No. 4684 – RI Energy Efficiency Resource Mgmt. Council (EERMC) Energy Efficiency Savings Targets, 2018-2020**

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