

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

October 25, 2017

Re: Support 2018-2020 Three Year Energy Efficiency & System Reliability Plan

Dear Chairperson Curran and Commissioner Gold,

People's Power & Light (PP&L) is a Rhode Island non-profit that advocates on behalf of consumers and the environment. We are active members of the RI Energy Efficiency Collaborative and we appreciate the opportunity to provide brief written comments to express our support of the 2018-2020 Three Year Energy Efficiency Plan.

As dedicated participants in the Collaborative, we can confirm that a lot of work and debate went into this Plan. PP&L would like to point out that it does not capture all the savings that provide benefits in excess of their costs. In fact, the electricity benefit-cost ratio averages about 3:1 and the gas benefit cost-ratio averages about 2:5. Because these numbers are so far above 1:1, it means we are losing opportunities to save money and reduce greenhouse gas emissions.

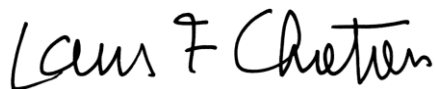
There are two elements in the plan that we strongly support. First, it is the application of the Rhode Island Test, which better values reduced greenhouse gas emissions. We are also supportive of the new innovation line in the Plan to enable new technologies and programs to garner more savings and participation.

Unfortunately, we want to go on record that the \$12.5 million raid of efficiency funds by the General Assembly for the state budget is bad public policy. It goes against the spirit of least cost procurement and is grossly unfair to the Rhode Island ratepayers who pay for these programs. Ratepayers are now going to spend more than \$12.5 million on greenhouse gas emitting natural gas as a result of the state budget. In light of the recent rate hike and concerns about energy costs, we see energy efficiency as the antidote. These efficiency programs reduce future supply costs, cut polluting emissions, and support Rhode Island's economy by growing jobs and keeping energy dollars in the state.

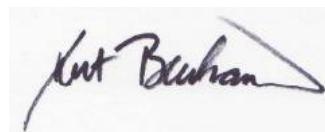
PP&L will continue to advocate for strong lifetimes savings goals and long-term investments that have a solid payback for Rhode Island consumers. We also will continue to push for services that meet the unique needs of all customers who may be underserved by these programs, such as moderate income customers, renters, and heating oil consumers in the upcoming annual plans.

Thank you for your time considering our comments regarding the 2018-2020 Three Year Energy Efficiency Plan. We hope you will support it.

Sincerely,



Larry Chretien, Executive Director



Kat Burnham, Energy Programs Manager