



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
Department of Administration
DIVISION OF LEGAL SERVICES
One Capitol Hill, 4th Floor
Providence, RI 02908-5890

Tel: (401) 222-8880
Fax: (401) 222-8244

December 4, 2020

Via Regular U.S. Mail & Electronic Mail

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

RE: Docket 5076 – 2021-2023 Energy Efficiency Program Plan & 2021 Annual Energy Efficiency Plan - Responses to PUC's First Set of Data Requests Directed to OER

Dear Ms. Massaro:

Enclosed for filing in the above referenced docket, please find an original and five copies of the Rhode Island Office of Energy Resources' Responses to PUC's First Set of Data Requests.

A PDF version of the enclosed was sent to the Service List via email.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Albert J. Vitali III
Senior Legal Counsel

Enclosures

Docket No. 5076 - National Grid – 2021-2023 Energy Efficiency Program Plan & 2021 Annual Energy Efficiency Program Plan

Name/Address	E-mail Distribution List	Phone
National Grid Andrew Marcaccio, Esq. National Grid 280 Melrose St. Providence, RI 02907	Andrew.Marcaccio@nationalgrid.com ;	401-784-4263
	Raquel.webster@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	Celia.obrien@nationalgrid.com ;	
	Matthew.Chase@nationalgrid.com ;	
	Timothy.Roughan@nationalgrid.com ;	
	John.Tortorella@nationalgrid.com ;	
	Christopher.Porter@nationalgrid.com ;	
	BENJAMIN.RIVERS@nationalgrid.com ;	
	John.Richards@nationalgrid.com ;	
	Matthew.Ray2@nationalgrid.com ;	
Division of Public Utilities and Carriers Jon Hagopian, Esq.	Jon.hagopian@dpuc.ri.gov ;	401-784-4775
	Margaret.L.Hogan@dpuc.ri.gov ;	
	john.bell@dpuc.ri.gov ;	
	Joel.munoz@dpuc.ri.gov ;	
Tim Woolf Jennifer Kallay Synapse Energy Economics 22 Pearl Street Cambridge, MA 02139	twoolf@synapse-energy.com ;	
	jkallay@synapse-energy.com ;	
RI EERMC Marisa Desautel, Esq. Office of Marisa Desautel, LLC 55 Pine St. Providence, RI 02903 Mike Guerard, Optimal Energy	marisa@desautelesq.com ;	401-477-0023
	guerard@optenergy.com ;	
	ross@optenergy.com ;	
	kravatz@optenergy.com ;	

Acadia Center Hank Webster, Director & Staff Atty.	HWebster@acadiacenter.org ;	401-276-0600 x402
Office of Energy Resources (OER) Albert Vitali, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908 Nick Ucci, Commissioner	Albert.Vitali@doa.ri.gov ;	401-222-8880
	Nancy.Russolino@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Becca.Trietch@energy.ri.gov ;	
	Carrie.Gill@energy.ri.gov ;	
	Nathan.Cleveland@energy.ri.gov ;	
Green Energy Consumers Alliance Larry Chretien, Executive Director Kai Salem	Larry@massenergy.org ;	
	kai@greenenergyconsumers.org ;	
	priscilla@greenenergyconsumers.org ;	
Original & 9 copies file w/: Luly E. Massaro, Commission Clerk John Harrington, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	John.Harrington@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Frederick Sneesby Dept. of Human Services	Frederick.sneesby@dhs.ri.gov ;	
Chris Vitale, Esq., RI Infrastructure Bank	cvitale@hvlawltd.com ;	
	SUsatine@riib.org ;	
Doug Gablinske, Executive Director The Energy Council of RI	doug@tecri.org ;	
Jordan Garfinkle Bloom Energy	Jordan.Garfinkle@bloomenergy.com ;	

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Request:

Referencing Attachment 4-23-9 from National Grid's responses to PUC data requests, please explain the distinction between the categories "LCP Eligible" and "All Energy Eligible." Please explain the differences between the two categories and describe what types of measures or investments are included in each category. Please also explain if there is a difference between OER's definition of cost-effectiveness and that adopted by the PUC in the Least Cost Procurement Standards.

Response:

The "LCP Eligible" category refers to Efficient Buildings Fund (EBF) projects, or portions thereof, that pass a cost-effectiveness screening which the Office of Energy Resources (OER) believes to be required by the LCP statute. The dollar amount listed in the "LCP Eligible" category is the amount that could be supported by LCP funds from the Energy Efficiency Plans based on OER's cost-effectiveness analysis of the project. EBF projects, or portions thereof, listed in this category comply with both the EBF statute requirements and the LCP statute requirements. Investments likely to fall under this category are cost-effective energy efficiency measures including, but not limited to, LED lighting, weatherization, efficient HVAC equipment, and LED streetlight conversions.

The "All Energy Eligible" category refers to EBF projects that meet the requirements of the EBF statute only. Investments likely to fall under this category, but not the "LCP Eligible" category, are holistic energy system components needed to bring efficient equipment online, such as electric wiring needed when upgrading old lighting or mechanical control systems, preparing electric vehicle charging infrastructure, or ductwork upgrades required to bring efficient HVAC equipment online.

This Project Priority List framework provides the Rhode Island Infrastructure Bank (RIIB) with guidance on how different funding sources can support each approved project. The information allows RIIB to work with potential borrowers and leverage private capital to provide a financing package that meets each project's unique needs and components.

OER's cost-effectiveness screening for EBF projects is different, although well-aligned, with the cost-effectiveness screening established in the LCP Standards. The Least Cost Procurement Standards uses the Docket 4600 framework to define cost effectiveness. For EBF projects, OER defines cost-effectiveness as total financing costs being less than or equal to total lifetime energy, operations, and maintenance cost savings. Total financing cost is defined as the cost of the proposed measures (customer contribution less any energy efficiency incentives provided), the total debt service, and a 5% contingency allowance. Applicants are able to bundle recently completed efficiency projects (completed in the last 2 years) as part of their application.