

# Memo



STATE OF RHODE ISLAND  
**ENERGY EFFICIENCY &  
RESOURCE MANAGEMENT COUNCIL**

**To:** Energy Efficiency & Resource Management Council  
**From:** Mike Guerard, Sam Ross  
**CC:** Becca Trietch  
**Date:** February 24, 2020  
**Subject:** Targets & LCP Standards update and next steps

CONSULTANT TEAM

The process leading to the EERMC's required vote and submittal of Targets and Least Cost Procurement (LCP) Standards for 2021-2023 is nearing its final phase. At the March 19, 2020 EERMC meeting, council members will vote to provide recommendations on the 2021-2023 Targets and LCP Standards to the RI Public Utilities Commission (PUC).

The preliminary, *draft* documents attached to this memo are consistent with recent Targets/LCP Standards filings, and are updated where appropriate with text for 2021-2023 based on information currently available. The first attachment is what the Consultant Team (C-Team) will provide you before the March EERMC meeting, once all required information is collected. The second attachment is a draft of the letter that the EERMC's counsel will file on your behalf with the PUC pending your vote. They are provided to give you a sense of the supporting documentation that will be available to inform your vote.

The incomplete sections will be updated based on the following upcoming events:

- February 24/25: Receipt of the updated findings on the Market Potential Study from Dunsky
- February 26: PUC Technical Sessions on the LCP Standards (10 am) and the Market Potential Study (2 pm)
- February 27: EERMC meeting and related council member input (including direction to the C-Team on any elements of the outline that are missing and would be important to include) and stakeholder public comment
- February/March TBD: meeting(s) with the Market Potential Study Management Team, Dunsky and National Grid
- February/March TBD: meeting(s) with additional stakeholders on request with C-Team and OER

Upon conclusion of these events, the C-Team will complete the Targets/LCP Standards Recommendation Memo, with the updated Market Potential Study presentation as an attachment. This document will be provided to the EERMC no later than March 12. The C-Team and OER will be available for any questions or concerns you have on an ongoing basis. Additionally, we will be reaching out to each council member to offer one-on-one meetings to provide additional background and information to support your consideration of the proposed Targets and LCP Standards. The C-Team and OER will also be in regular contact with key stakeholders, including National Grid and the Technical Working Groups, to inform the final recommendations.

**ATTACHMENT 1**

# Recommended Targets for Electric and Natural Gas Energy Efficiency & Proposed Amendments to the Least Cost Procurement Standards for 2021-2023

Prepared for



STATE OF RHODE ISLAND  
**ENERGY EFFICIENCY &  
RESOURCE MANAGEMENT COUNCIL**

Prepared by:

The Rhode Island Energy Efficiency and Resource Management Council Consultant Team

Lead Authors: Mike Guerard, Sam Ross / Optimal Energy, Inc.

**February 27, 2016**

## Table of Contents

I.	<a href="#">Introduction</a> .....	4
II.	<a href="#">Savings Targets</a> .....	6
	Summary of Market Potential Study results.....	<b>Error! Bookmark not defined.</b>
	Metrics used for Targets .....	<b>Error! Bookmark not defined.</b>
	<a href="#">Conclusion and Recommended Efficiency Savings Targets</a> .....	10
III.	<a href="#">Proposed Amendments to Least Cost Procurement Standards</a> .....	12
	<a href="#">Summary of primary themes and objectives for proposed Revisions to LCP Standards</a> .....	12
	<a href="#">Specific language proposed for inclusion in the LCP Standards</a> .....	<b>Error! Bookmark not defined.</b>
IV.	<a href="#">2018-2020 Savings Targets and LCP Standards Conclusion</a> .....	12
	<a href="#">Appendix A: Market Potential Study presentation by Dunsky Energy Consulting</a> .....	12
	<a href="#">Appendix B: Minutes of EERMC meetings and visual presentations on Targets &amp; LCP Standards</a> .....	12

## I. INTRODUCTION

This Memorandum presents proposed Three Year Savings Targets (“Targets”) for National Grid’s upcoming 2021-2023 Energy Efficiency Procurement Plan (“Three Year Plan”). These recommendations are based on the EERMC Consultant Team’s oversight and review of findings of the EERMC-funded Market Potential Study, conducted by Dunsy Energy Consulting, and resulting discussions with stakeholders and the Energy Efficiency and Resource Management Council (“EERMC”). The Memorandum also presents proposed modifications to the Least Cost Procurement Standards (“LCP Standards”), which will guide utility planning, cost-effectiveness assessment, program design, and implementation strategy for that same three-year period. Upon approving Targets and LCP Standards, as recommended or with modification, the EERMC’s counsel will submit the proposed Targets and proposed modifications to the LCP Standards to the Rhode Island Public Utilities Commission (PUC).

This will be the fourth submittal of triennial Targets and LCP Standards by the EERMC to the PUC since the promulgation of the 2006 Comprehensive Energy Conservation, Efficiency and Affordability Act, or “Least-Cost Procurement Law.” This process has also served to meet the EERMC’s legislated requirement in R.I. Gen. Laws § 39-1-27.7(c)(1):

*“The commissioner of the office of energy resources and the energy efficiency and resources management council, either jointly or separately, shall provide the commission findings and recommendations with regard to system reliability and energy efficiency and conservation procurement on or before March 1, 2008, and triennially on or before March 1, thereafter through March 1, 2024. The report shall be made public and be posted electronically on the website of the office of energy resources.”*

The proposed Targets presented by the Consultant Team are for both Electric Energy Efficiency and Natural Gas Efficiency programs for saving in each of the three years.

### Objectives for Targets

This memorandum presents for the EERMC the Consultant Team’s recommendations for 2021-2023 savings targets for National Grid’s upcoming Three Year Plan. These targets are presented by the Consultant Team for consideration by the EERMC in their deliberations regarding the savings targets they will recommend to the PUC. These proposed targets are derived from **[the MPS and stakeholder engagement.....additional text to be added]**

Electric and natural gas distribution companies are required by R.I. Gen. Laws § 39-1-27.7 System Reliability and least-cost procurement, subsection (c)(4) to file Three-Year plans for system reliability and energy efficiency and conservation procurement with the PUC.

In 2010, the legislature adopted the ratemaking concept of revenue decoupling, in R.I. Gen. Laws § 39-1-27.7.1. Pursuant to § 39-1-27.7.1(f), the EERMC was required to submit proposed energy savings targets to the PUC by September 1, 2010. The purpose of these targets was to give the utility guidance on the potentially available cost-effective efficiency resources in the state that would feed into the normal LCP

Three-Year and Annual efficiency program planning processes under § 39-1-27.7. During these normal planning processes required by Rhode Island law, the efficiency programs and budgets are developed by the utility and the cost-effectiveness of the budgets and programs is reviewed and approved by the EERMC before being filed with the Commission for their consideration and action. In addition, the planning process provides for crucial and substantial input and contributions from diverse stakeholders during the development of the Three Year and Annual Plans.

It is important to re-iterate the purpose of these Targets. In the September 1, 2014 filing, and subsequent consideration of the targets in the previous cycle, the EERMC stated:

*The EERMC and the parties understand that the efficiency savings targets are intended to serve as guideposts as the utility develops its Three-Year EE Procurement Plan and more detailed annual EE Program plans. As the parties described in a joint brief filed with the Commission in Docket 4202 on April 1, 2011:<sup>1</sup> “It is important to note that the energy efficiency savings targets are just that, targets of what the EERMC assessment estimates is potentially available for cost-effective efficiency...*

*...In summary, while the robust and detailed 3-Year Efficiency Procurement Plan and the related annual Efficiency Program Plans are subject to the cost-effectiveness standards of § 39-1-27.7(c) (5), the targets developed by the EERMC under R.I.G.L § 39-1-27.7.1(e)(4) and (f) are not subject to the cost-effectiveness standard, because as high level estimates, the purpose of the targets is simply to guide the development of those plans. The 2010 legislation recognizes that the energy savings targets themselves do not constitute a plan, but rather the targets are just high-level estimates of the potentially available cost-effective efficiency, whose function is to guide the development of actual Three-year LCP and annual efficiency plans.”*

While the Consultant Team has had the benefit of well-developed Market Potential Study to gain confidence that the recommended targets are reasonable, attainable, and consistent with Rhode Island law, we need to re-iterate that the language highlighted above also applies to these proposed targets for 2021-2023.

Further, to support consideration of the implications of this clarification, we acknowledge that while the 2021-2023 electric and natural gas savings targets have been developed using the best information and data available at this time, the annual savings targets, and most critically the associated budgets, should be reviewed each year during the development of the Annual Plans. Following this review, the target should either be confirmed or revised in light of new information, as described in the proposed Least Cost Procurement Standards for 2021-2023 to be filed with these Targets (pending their adoption).<sup>2</sup> The parties participating in the Annual Plan development should agree that revisions to the annual energy

---

<sup>1</sup> The joint brief is available at: [http://www.ripuc.org/eventsactions/docket/4202-EEMRC-JointRR\(4-1-11\).pdf](http://www.ripuc.org/eventsactions/docket/4202-EEMRC-JointRR(4-1-11).pdf)

<sup>2</sup> “The Utility shall include a preliminary budget for the Three-Year Plan covering the three-year period that identifies the projected costs, benefits, and initial energy saving targets of the portfolio for each year. The budget shall identify, at the portfolio level, the projected cost of efficiency resources in cents/ lifetime kWh or cents/lifetime MMBtu. The preliminary budget and initial energy saving targets may be updated, as necessary, in the Utility’s Annual Energy Efficiency Plan.” Section 1.3. B. iv. b.

savings targets should be based only on clearly documented changes in cost-effective resource availability.

## **Objectives for the LCP Standards**

The proposed revisions to the Standards are included as Appendix A in this filing. ***[Additional text to be added.]***

## **II. SAVINGS TARGETS**

### **Context and Industry Overview**

The targets for the 2021-2023 Three Year planning cycle are based on very detailed analysis and research, grounded in years of program experience and performance, and on a working knowledge of the current state and potential of the existing market, all of which informed the Market Potential Study. ***[Narrative to be completed on the key issues/findings from the potential study.]***

### **Metrics used for Targets**

In Rhode Island and many other jurisdictions, policy-makers set high level performance goals for utilities and/or non-utility administrators (“Program Administrators” or “PA”) of energy efficiency programs. These performance goals usually including some measure of the amount of energy savings that will be produced. There are several different approaches and assumptions that can be used to determine appropriate energy savings targets. Those goals should ideally be expressed in a manner that is most consistent with public policy objectives. That is, they should encourage efficiency program administrators to optimize their efficiency program portfolios in ways that maximize achievement of those objectives.

### **Considerations – a.) Savings Longevity**

#### **Topic Overview**

One important element affecting the value of efficiency investments is the longevity of the savings that the investments produce. Some efficiency programs produce savings that are relatively short-lived, either because they rely on behavioral change that doesn’t persist for long periods of time absent continued or additional efficiency program support, or because they promote measures that do not last very long before they wear out and need to be replaced. Examples of the latter are programs that emphasize the sale, purchase and/or installation of low flow showerheads and other hot water conservation measures, advanced or “smart” power strips, and steam traps. Other programs produce savings that are much longer-lived because they focus on measures that are either permanent (e.g. the orientation of a new building) or have very long lives (e.g. building insulation, HVAC equipment and some appliances). Historically, savings targets in Rhode Island and elsewhere, have been expressed in annual savings, or the amount of savings that efficiency measures will produce just in their first year of functionality. That metric encourages utilities charged with designing and implementing efficiency programs to maximize first year savings rather than lifetime savings or the value of the benefits provided over the entire lives of the efficiency measures. However, targets focused on lifetime savings,

would place greater value on capturing those savings that offer the largest lifecycle net economic benefits.

## **Option 1: Annual Savings**

### ***Pros***

Annual energy savings represent the energy savings occurring in a given year from efficiency measures implemented in that year. As previously mentioned, annual savings have historically been used as a primary savings metric in Rhode Island and many other states. It is therefore a metric familiar to stakeholders and is relatively easy to explain, understand, and measure. Annual savings represent the are commonly used to calculate savings relative to sales in a given year, which provides a value that is simple to benchmark and compare across states using common terms. Also, short-term savings measures, such as lighting and behavior changes, are often inexpensive and easy to implement. Setting annual savings targets therefore allow program administrators to meet goals in a way that minimizes short-term budget requirements and bill impacts. From a resource planning perspective, focusing on annual savings address short-term capacity or distribution requirements.

### ***Cons***

The primary downside of focusing on annual savings is that it fails to encourage utilities to maximize the value of the benefits provided over the entire lives of the efficiency measures. Consider, for example, the hypothetical decision a utility must make when deciding whether to promote an efficiency measure that saves 20 therms of gas for just one year and costs \$10 (i.e. \$0.50 per unit of first year savings and \$0.50 per unit of lifetime savings) or a measure that saves 100 therms per year for 20 years and costs \$200 (i.e. \$2.00 per unit of first year savings and \$0.10 per unit of lifetime savings). All other things being equal, the low cost per unit of first year savings creates an incentive that encourages utilities to invest much more in the first measure even though the second measure provides five times as much value over its life.<sup>3</sup> This may cause program administrators to focus on measures that are inexpensive in the short-term, but to miss savings potential from deeper savings measure that result in longer-term benefits. Further, an annual savings focus does not support using energy efficiency to for resource planning purposes or meet long-term climate goals.

## **Option 2: Lifetime Savings**

### ***Pros***

Using a lifetime savings metric encourages program administrators to focus on longer term savings measures that maximize benefits over the life cycle of the measures. Focusing on long term savings is also often closely related to other policy objectives, such as reducing greenhouse gas emissions. Further, measures with long measure lives are often associated with non-energy benefits such as health and

---

<sup>3</sup> The factor of five is calculated without any discounting of future benefits. However, even if future benefits were discounted using a 5% real annual discount rate, the second measure would be far preferable, providing more than three times the lifetime benefits.

comfort. Another benefit of using a lifetime metric is that it allows for energy efficiency to be used for resource planning and preventing or displacing supply-side resources.

### **Cons**

Although lifetime savings focus on maximizing program benefits, they are somewhat more challenging to understand and track. Few states set energy efficiency targets in terms of lifetime savings, so the ability to benchmark and compare results to other jurisdictions could be limited. Because annual savings targets have been the focus in Rhode Island, work would need to be done to reorient stakeholders to a different savings metric and allow them to understand current and future achievement in the context of past achievement. Savings lifetimes have also been found to vary significantly within a program category between program administrators.<sup>4</sup> Lifetime savings can vary for a number of reasons such as different measure mixes among similar programs, or different levels of rigor in evaluation, measurement and verification.

## **Consideration – b.) Savings units**

### **Topic Overview**

Historically, most energy savings goals have been developed, tracked, and reported separately for each fuel: megawatt-hours for electricity; gallons or MMBtus for fuel oil; and therms, ccf or MMBtus for gas. However, this practice fails to present a unified picture of energy efficiency efforts and savings opportunities. For example, measures installed in electric energy efficiency programs often result in delivered fuel savings (oil, propane, etc). Although these savings may be included as benefits for cost-effectiveness screening, these non-regulated fuel savings typically don't count toward a program administrator's savings target achievement. As more and more states focus on strategies for reducing total energy use and greenhouse gas emissions, such as strategic electrification, including all-fuel impacts into a common savings metric can more accurately reflect policy goals.

Further, while energy efficiency savings have largely been on a year after year upward trajectory for the last decade, that trend is beginning to change. Program Administrators are facing a steep decline in claimable lighting savings over the next several years. This reduction in savings is due to federal standards and market developments with associated impacts on net-to-gross ratios. For many years, residential lighting was an inexpensive and plentiful source of electric savings for many jurisdictions. As states look towards a future where claimable electric savings are significantly reduced due to changes in the lighting market, moving to a single fuel-neutral energy savings metric provides the opportunity to maintain overall strong efficiency savings.

## **Option 1: Common All-Fuels Metric**

### **Pros**

---

<sup>4</sup> <https://emp.lbl.gov/sites/default/files/savings-lifetime-persistence-brief.pdf>



Developing and establishing a single energy savings metric for multi-fuel goals could provide several benefits. First, it provides a clearer picture of total energy savings. In some cases, focusing only on electric and gas savings omits large contributions from reductions in oil and propane consumption. For example, the savings from oil and propane are often reported in a secondary fashion, separate from electric and gas savings. A multi-fuel metric allows for “apples-to-apples” comparisons of all PA efforts and serves as an effective tool for prioritizing those initiatives that save the most energy overall. As policy discussions speak increasingly in terms of carbon reduction, a multi-fuel metric can better inform those reductions than looking at individual fuels discretely. An all fuels metric also allows for a better assessment of the net impact of fuel switching and would allow program administrators to focus on achieving broader policy goals.

### ***Cons***

An all-fuels metric can be more complicated to track and understand than tracking fuels on an individual basis. For example, a key consideration for developing an all-fuel metric would be to determine whether site energy use or source energy use is the basis for measurement. Under most current reporting frameworks program administrators report site energy, or energy that is saved at the customers’ meters. Using a common site energy metric would only require that electric savings currently measured in kWh be converted to MMBtu using basic energy equivalence. This can be a useful metric when comparing, for example, what portion of the savings in a certain program are coming from which fuel source. However, for the purposes of goal setting, using a common site energy metric does not provide a full picture of energy savings because it does not account for plant losses and line losses that occur from the source of electric generation to the building consuming the energy. Source savings help to level the playing field for electric savings and savings from other fuel sources. However, using a source MMBtu metric could make it difficult to compare results that have been tracked at a site level in the past and may be difficult for stakeholders to understand. Calculating source energy savings also requires that the heat rates of generating facilities and system line losses be known. These values would need to be determined and updated periodically. It is also important to keep in mind that the benefits associated with an MMBtu of energy savings differs by fuel.

## **Option 2: Separate Fuel-Specific Metrics**

### ***Pros***

Setting energy savings targets based on individual fuels would be clear and easy to understand as well as consistent with historic target setting. Separate savings metrics would also provide more granularity around the sources of savings and benefits achieved through energy efficiency programs.

### ***Cons***

Continuing to set targets based on individual fuels, particularly if only electricity and gas are included, would fail to encourage program administrators to maximize total energy savings. It may also prevent the energy efficiency programs from most effectively contributing to broader policy goals such as encouraging strategic electrification and reducing greenhouse gas emissions.

## Stakeholder Input

*[Description to completed of stakeholder engagement via Technical Working groups and other forums that supported Target recommendations.]*

## Overview of Methodology and Results

*[Description to be completed of the Market Potential Study content, objectives and deliverables leading to Low, Mid and Max scenarios.]*

## Conclusion and Recommended Efficiency Savings Targets

As discussed above, the Consultant Team engaged in an extensive process to identify the achievable potential of electric and natural gas energy efficiency savings in Rhode Island for the 2021-2023 period, based primarily on the findings of the Market Potential Study. While there is some level of uncertainty in forecasting the future, the Consultant Team has high confidence that the process undertaken effectively identifies an achievable potential.

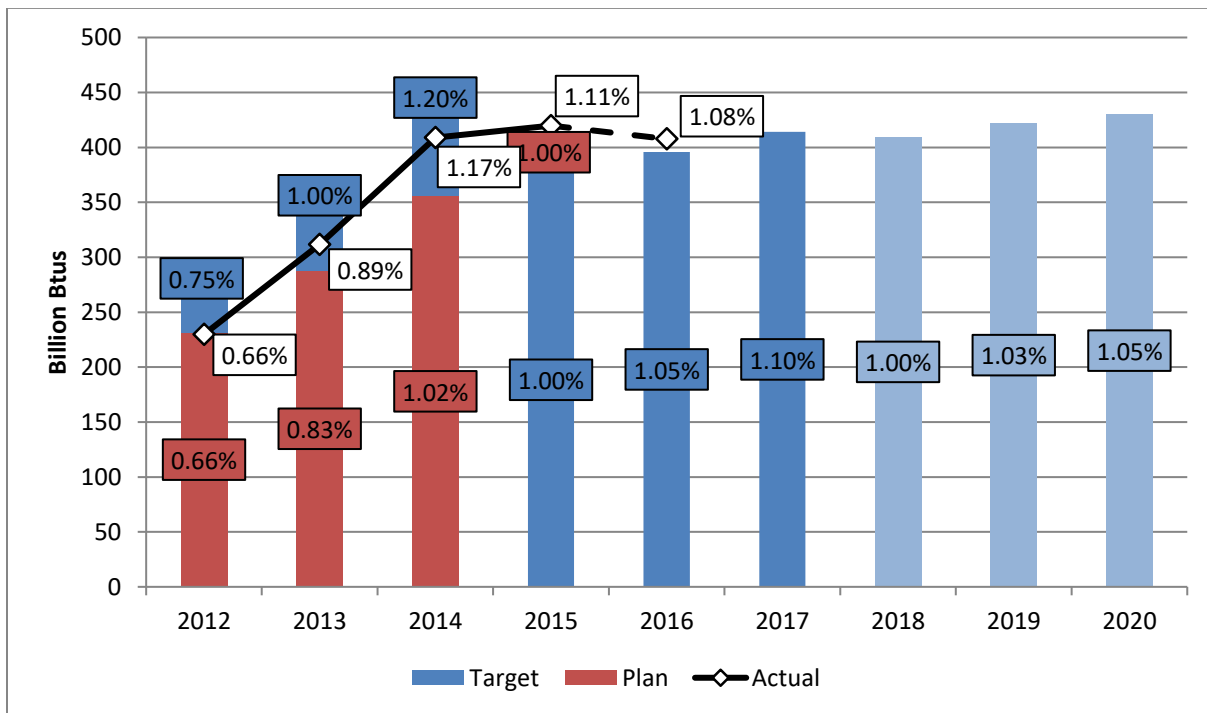
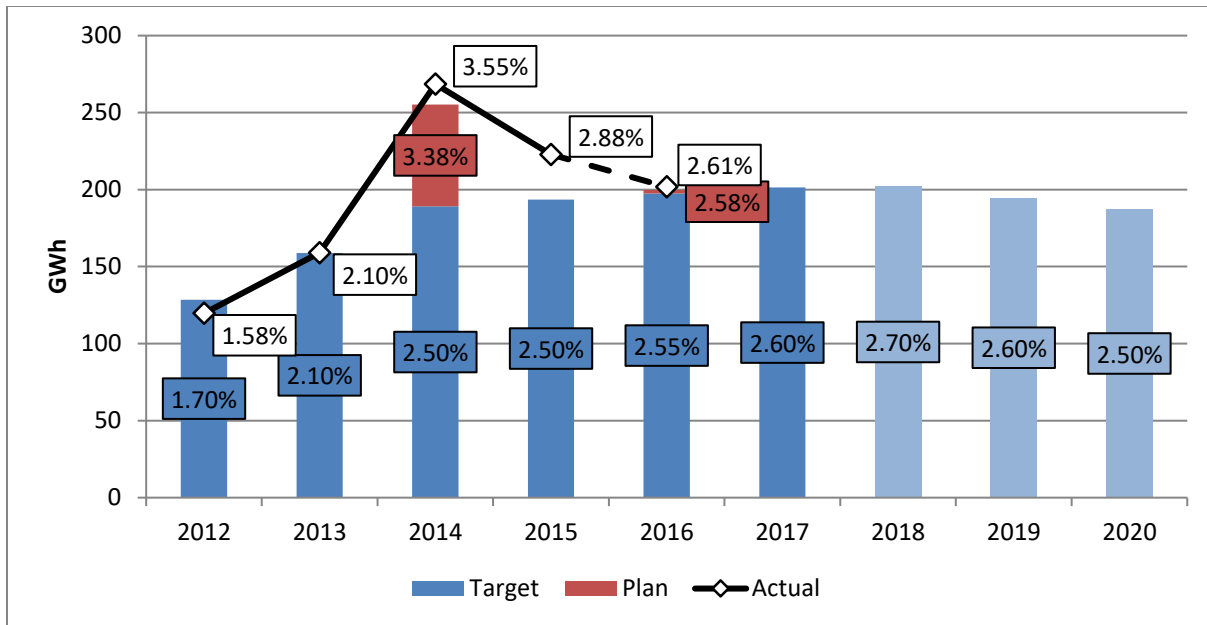
**Table x | Proposed 2021-2023 Savings Targets**

Targets	2021	2022	2023	2021-2023
Electric (MWh)	Xxx,xxx	Yyy,yyy	Zzz,zzz	Abc,def
% of ...	x.yz%	x.yz%	x.yz%	x.yz%
Natural Gas (MMBtu)	Xxx,xxx	Yyy,yyy	Zzz,zzz	Abc,def
% of ...	x.yz%	x.yz%	x.yz%	x.yz%

The electric savings targets, at the portfolio level, represent a slight (*tbd*) trajectory year over year. This is largely due to..... *tbd*.

The gas savings targets, at the portfolio level, represent a slight (*tbd*) trajectory year over year. This is largely due to..... *tbd*.

For context, the following two charts show the historical tracking of targets, associated annual plans and actual results. *[Charts will be updated to added recommended 2021-2023 targets]*



### **III. PROPOSED AMENDMENTS TO LCP STANDARDS**

*[Section to be updated pending PUC Technical Session on February 26 And EERMC meeting on February 27.]*

#### **Summary of Revisions to EE Standard**

*[Section to be updated pending PUC Technical Session on February 26 And EERMC meeting on February 27.]*

#### **Detailed List of Changes**

*[Section to be updated pending PUC Technical Session on February 26 And EERMC meeting on February 27.]*

### **IV. 2021-2023 TARGETS AND LCP STANDARDS CONCLUSION**

The Consultant Team recommends that the EERMC adopt these proposed targets for electric and gas savings as its proposal to the Commission for savings targets that the National Grid energy efficiency programs should plan to achieve in the years 2021, 2022, and 2023.

The Consultant Team also recommends that the EERMC adopt the attached proposed revisions to the EE and SRP Standards as its proposal to the Commission for proposed modifications to the Standards for the 2021-2023 Three Year Planning period.

---

## **Appendix A: Proposed Revisions to the Standards**

*[Market Potential Study results from Dunsky]*

---

## **Appendix B: EERMC meeting materials and documentation**

*[EERMC meeting minutes and presentations relating to Potential Study/Targets/LECP Standards]*

## **ATTACHMENT 2**

### Voting Members

Mr. Christopher Powell, Chair  
Mr. Anthony Hubbard, Vice Chair  
Mr. Peter Gill Case  
Mr. Joe Garlick  
Mr. Thomas Magliocchetti  
Mr. Bill Riccio  
Mr. Butch Roberts  
Mr. Kurt Teichert  
Ms. Karen Verrengia  
Mr. Bob White

### Non-Voting Members

Mr. Nicholas Ucci, Acting Executive Director  
Ms. Roberta Fagan  
Mr. Matthew Ray  
Mr. Timothy Roughan

## The Rhode Island Energy Efficiency and Resource Management Council (EERMC)

March 28, 2020

Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

RE: Energy Efficiency Savings Targets, 2021-2023

Dear Chair *[tbd]*, Commissioner Anthony, and Commissioner Gold,

The Energy Efficiency and Resource Management Council (“the Council” or “EERMC”) conducted in-depth analysis, research and stakeholder engagement to establish achievable, cost-effective levels of energy efficiency to inform proposed energy savings targets (“Targets”) to support development of a triennial energy efficiency plan. Similar processes were undertaken in 2010, 2013 and 2016, which has proven to be a critical component in supporting planning and implementation consistent with Least Cost Procurement (“LCP”) objectives. Concurrent to the energy savings Target effort, the EERMC also reviewed and proposes enhancements to the Least Cost Procurement Standards for Energy Efficiency and System Reliability Procurement (“LCP Standards”). In the first two Targets and LCP Standards cycles commencing in 2010 and 2013, the filing of the Targets were delivered at the end of the year prior to the development of Three Year Plans, and the proposed modifications to the LCP Standards were filed early in the year in which the Three Year Plan was developed. Each time, both were addressed in a consolidated Docket. For the cycle covering the current 2018-2020 Three Year Plan, the EERMC combined the Targets and LCP Standards efforts given their inter-related nature and submitted them together at the end of 2016 to support the 2017 activities relating to developing the Three Year and Annual Plans covering 2018-2020. By way of this letter and its attachments, the Council again respectfully submits to the Commission for review and consideration high-level electric and natural gas energy efficiency savings Targets and proposed modifications to the LCP Standards in a combined submittal.

The proposed Targets and LCP Standards, subject to the PUC’s approval, will guide LCP for the 2021-2023 implementation period and will inform National Grid’s Three Year planning process, and the subsequent Annual Implementation plans. Both the Three Year Plan, and each Annual Plan will be submitted for review and approval to the PUC. These Plans will convert the Targets and LCP Standards into increasingly detailed strategic documents with budgets, implementation strategies, cost-effectiveness analysis, and specified outcomes to guide the acquisition of least cost resources for Rhode Island customers.

To inform the Targets proposed herein, the EERMC commissioned a Market Potential Study and directed its Consultant Team to oversee the activities of the selected vendor, and to facilitate the process of analytical review, stakeholder engagement and council member support to inform the appropriate Targets to establish for the 2021-2023 period. *[More text on rationale, objectives and outcomes to follow.]*

Based on the Market Potential Study conducted by Dunskey Energy Consulting, Council deliberations and ongoing engagement with stakeholders, the EERMC’s Consultant Team developed and presented the attached Memorandum to the EERMC ahead of the March 19, 2020 EERMC meeting. The Memorandum contains... *[Text to follow based on Council input on content to include]*.

As a result of EERMC deliberations at the February 27 and March 19, 2020 council meetings, and public comments provided at the meetings, the EERMC voted at the March 19, 2020 council meeting to recommend the Targets captured in the table below to the PUC. The EERMC also voted to approve recommendations to enhance the LCP Standards, and the proposed revisions are included as Appendix A in this filing. The proposed Targets presented are for both Electric Energy Efficiency and Natural Gas Efficiency programs for *lifetime/annual (?)* saving in each of the three years, and are represented as a percentage of the electric and gas sales from a base year of 2018<sup>5</sup>. These are:

<b>Targets</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2018-2020</b>
<b>Electric (MWh)</b>	<b>Xxx,xxx</b>	<b>Xxx,xxx</b>	<b>Xxx,xxx</b>	<b>Xxx,xxx</b>
<b>%</b>	<b>x.xx%</b>	<b>x.xx%</b>	<b>x.xx%</b>	<b>x.xx%</b>
<b>Natural Gas (MMBtu)</b>	<b>Xxx,xxx</b>	<b>Xxx,xxx</b>	<b>Xxx,xxx</b>	<b>Xxx,xxx</b>
<b>%</b>	<b>x.xx%</b>	<b>x.xx%</b>	<b>x.xx%</b>	<b>x.xx%</b>

The EERMC believes that the process (discussed in the Memorandum) for inclusion of National Grid, the Office of Energy Resources, the Division of Public Utilities and Carriers, parties to the Energy Efficiency and System Reliability Technical Working Groups and other affected parties has helped ensure essential input and a solid level of agreement among the key players in

<sup>5</sup> The 2018 year is the last complete year of actual sales, and is used as reference to consistently benchmark each of the three years covering 2021-2023.

Rhode Island that these Targets and LCP Standards will provide appropriate guidance to the implementation of LCP in Rhode Island in the 2021-2023 time period.

Respectfully Submitted, THE RHODE ISLAND ENERGY  
EFFICIENCY AND RESOURCE MANAGEMENT COUNCIL

By its attorney, /s/ \_\_\_\_\_

CERTIFICATE OF SERVICE I hereby certify that on the day of March 28, 2020, I delivered a true copy of the foregoing document either by first class mail or by electronic mail to the Rhode Island Public Utilities Commission as required by R.I.G.L. § 39-1-27.7.1(f).

/s/  
\_\_\_\_\_