

**2025 Energy Efficiency Plan  
Outline Memorandum  
April 5, 2024**

Dear Energy Efficiency Technical Working Group Members and EEC Councilmembers,

Rhode Island Energy is providing stakeholders with this 2025 Energy Efficiency Plan Outline Memorandum (“Outline”) to provide early insights regarding the changes and topics that will be addressed in the coming draft of the 2025 Annual Energy Efficiency Plan. The intention of this Outline is to highlight key programmatic elements of the forthcoming annual plan that will be of interest and shape the discussion with stakeholders during the remainder of the planning process.

There is information that is not available at this stage of the planning process. This Outline does not include preliminary 2025 savings, benefits, or budgets because those detailed quantitative planning processes are still underway. This Outline also does not include the assessment of cost of supply and rate and bill impacts. Those analyses are dependent upon the planning and screening processes and will therefore be provided at later stages of the annual planning process.

Further, when reviewing this Outline, please note the following:

- a. This Outline should not be considered as a complete list of topics that will be addressed in the first draft of the Plan and is not binding. Subject to further discussions with stakeholders and analysis during the planning process, content included here may be modified reflecting the early stage at which this Outline is provided.
- b. This Outline highlights areas that will be covered where they are noticeably different, or of a larger focus, than in previous years.
- c. The structure of the Outline below is based on the 2024 Annual Plan.
- d. The Company may refine and consolidate the text to make a more readable and accessible final document.

**The Company requests that reviewers provide any written input on the contents of this Outline by Friday, April 26, 2024.**

A schedule of key planning dates is provided below.

April	
04/05/24 (Fri)	2025 Annual Plan Outline Memo Due to EEC
04/18/24 (Thu)	EEC Meeting
04/25/24 (Thu)	Technical Working Group Meeting
04/26/24 (Fri)	2025 Annual Plan Outline Memo Stakeholder Comment Period Ends
May	
05/16/24 (Thu)	EEC Meeting
05/23/24 (Thu)	Technical Working Group Meeting
June	
06/05/24 (Wed)	1st Draft of 2025 Annual Plan Narrative Due to EEC

<b>06/20/24 (Thu)</b>	EEC Meeting
<b>06/27/24 (Thu)</b>	Technical Working Group Meeting
<b>06/28/24 (Fri)</b>	First Draft Annual Plan Narrative Stakeholder Comment Period Ends
<b>July</b>	
<b>07/03/24 (Wed)</b>	First Draft 2024 Annual Numbers due to EEC
<b>07/18/24 (Thu)</b>	EEC Meeting
<b>07/21/24 (Sun)</b>	Comments due from EEC/Stakeholders on Draft Plan Numbers and BC Model
<b>07/25/24 (Thu)</b>	Technical Working Group Meeting
<b>August</b>	
<b>08/05/24 (Mon)</b>	Second Draft of 2025 Annual EE Plan due to EEC (Narrative and Numbers)
<b>08/15/24 (Thu)</b>	EEC Meeting
<b>08/22/24 (Thu)</b>	Technical Working Group Meeting
<b>08/23/24 (Fri)</b>	Second Draft 2025 Annual Plan Stakeholder Comment Period Ends
<b>September</b>	
<b>09/06/24 (Fri)</b>	Final Draft 2025 annual plan sent to EEC (Narrative and Numbers)
<b>09/06/24 (Fri)</b>	Final Draft BC Model for Annual Plan Sent to EEC
<b>09/12/24 (Thu)</b>	EEC Meeting
<b>09/26/24 (Thu)</b>	EEC Meeting
<b>09/27/24 (Fri)</b>	Technical Working Group Meeting
<b>October</b>	
<b>10/01/24 (Tue)</b>	2025 Plan Filed with PUC
<b>10/17/24 (Thu)</b>	EEC Meeting
<b>10/18/24 (Fri)</b>	File TRM with PUC
<b>10/18/24 (Fri)</b>	Final TRM to EEC

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## Pre-Filed Testimony

Consistent with the revised Least Cost Procurement Standards (“LCP Standards” or “Standards”), the Company will include pre-filed testimony with the Plan that the Plan is compliant with the Standards.

# 1. INTRODUCTION

## 1.1 Executive Summary

## 1.2 Plan Summary

## 1.3 The Planning Process

## 1.4 How to Read This Plan

# 2. STRATEGIES AND APPROACHES TO PLANNING

## 2.1 Strategic Overview of Programs and Priorities

This Annual Plan is the second year of the 2024-2026 Plan. This 2025 Plan supports continued innovation and accelerates the efficiency of Rhode Island homes and businesses. This Annual Plan achieves savings by implementing the following key strategic priorities set out in the 2024-2026 Plan:

### Five Key Priorities



Deliver optimized, tailored programs that serve all customers and **increase program reach**



Understand customer needs, planning cycles, and goals to optimize incorporation of the **next generation of efficiency measures**



Enhance financing options, simplify offerings, and raise customer awareness of complementary funding sources that can be leveraged to **enable customers to invest in efficiency**



**Serve customers equitably** by designing programs with a conscious effort to serve small business and low- and moderate-income; gender, racially and ethnically diverse; and non-native English-speaking customers



**Increase workforce capacity** to serve customers and implement energy efficiency

## 2.2 Principles of Program Design

This 2025 Plan has been guided by the LCP Standards as updated in RI PUC Docket 23-07-EE, which provides a set of principles of program design. The bullets below summarize the principles and, if appropriate, in what sections of this Annual Plan they will be addressed.

- **Integration with other programs and policies.**
  - Section 5: Coordination with Other Energy Policies and Programs provides details on the Annual Plan's connection to specific state policies. Energy Efficiency Program descriptions in Attachments 1 and 2 describe the dissemination of information on energy programs beyond those run directly by the Company.
- **Innovation.**
  - Innovative strategies are outlined in Attachment 8: Demonstrations, Pilots and Assessments.
- **Comprehensiveness.**
  - Examples of strategies to achieve deep savings that emphasize whole building and whole system solutions are found in the C&I market sector approach and the Residential and Income Eligible whole building delivery program descriptions (Attachments 1 & 2)
- **Equity.**
  - Using an equity lens involves consideration of how to modify systemic and institutional structures that have made it easier for some customers to access the energy efficiency programs than others. Sections 2.6.1 describe the Company's approach to equity in 2025.
- **Build on prior plans.**
  - The experience and lessons of prior planning and regulatory approval processes informs the current program design.
- **Build on prior programs.**
  - Programs are continuously evolving, building from one plan year to the next. Each program description in Attachments 1 and 2 has a section addressing program design changes for 2025.
- **Planned based on potential assessments.**
  - This Annual Plan is informed by the 2023 Market Potential Study Refresh, and the areas of opportunity identified within it, as well as the cost implications and approach to barrier mitigation necessary to achieve higher levels of potential savings.
- **Unlock capital and effectively uses funding sources.**
  - This Annual Plan consistently looks beyond direct financial incentives and traditional financing strategies to design capital and program access strategies that respond to specific customer barriers, such as grants for overcoming pre-weatherization barriers, a revised HEAT Loan or third-party financing.
- **Integration of natural gas and electric energy efficiency programs.**
  - All programs are integrated across fuels where it is possible to optimize and benefit from synergies between the two energy systems.
- **Strategies to achieve targets.**
  - As noted above, the overarching strategies highlighted in the 2024-2026 Plan permeate this Annual Plan.
- **Investments on behalf of all customers.**

- All customers contribute to energy efficiency program funding, and, in return, programs are designed so that all customers have the opportunity to participate. This element of equity is discussed further in section 2.6.1.
- **Efficacy.**
  - The Company has incorporated opportunities to balance the portfolio of energy savings measures and program approaches to drive higher cost efficiencies (i.e., the amount of energy savings per dollar invested) and minimize the impact on customer bills. Efficacy also incorporates workforce development, which is described further in section 2.6.2.
- **Parity among sectors.**
  - This Annual Plan examines the amount collected from the different sectors by the SBC, as compared to the program budgets by sectors, to ensure that sectors are generally receiving the benefits paid for. This is further described in section 6.4.3.
- **Cost effectiveness.**
  - Programs are cost effective as required and shown in Attachments 5 and 6. The application of cost effectiveness as a design principle at a program level involves a balancing of comprehensive, costly projects with long-term measures, with programming that requires less intensive customer support, such as upstream programming that moves the incentive from the end user to the point of sale and Strategic Energy Management Planning with very large customers.

Further details on the Company’s application of the Standards are found in section 6. As with any plan, this 2025 Plan was developed using the best information available at the time. Should circumstances change as the year develops, the Company will act in its capacity as Program Administrator to adapt as needed and inform stakeholders of the inability to execute a proposed strategy or commitment or the need to revise them.

The Company will evaluate measures in the Residential, Income Eligible, and Commercial & Industrial sectors using traditional cost of supply calculations and the RI Test. In addition, the Company will consider the value of each measure and program to the utility system through a mechanism that removes or discounts certain societal benefits and non-energy impacts, specifically interstate and delivered fuel benefits. For each measure with costs in excess of system benefits, the Company will consider the role of that measure in supporting programmatic goals and other LCP standard principles.

## 2.3 Residential Programs

In 2025, the Company will continue all Residential and Income Eligible energy efficiency programs offered in 2024. All Residential and Income Eligible programs are funded by electric and natural gas customers. The Company offers the programs detailed below to provide comprehensive services to two regulatorily defined sectors, market rate and income eligible.

2025 anticipated highlights and changes include:

### **EnergyWise Single Family**

- Deliberate on approaches to serve delivered fuels customers given PUC feedback.
- Increase emphasis on electric weatherization and electric resistance heat to heat pump conversions.



- Coordinate with OER on leveraging and braiding IRA funds.
- Continue to work on the issue of pre-weatherization barriers; through improved data collection and analysis, seeking additional funding, and exploring partnerships.

### **Multifamily & Income Eligible Multifamily**

- Leverage results of residential equity outreach initiative.
- Evaluate lead vendor performance (2025 will be the first full year of performance incentives with the lead vendor.)
- Continue the BlocPower demonstration.
- Target outreach to multifamily properties in equity communities, including building relationships with landlords.
- Institute a 100% weatherization incentive for multi-family properties where 100% of occupants are renters, so long as the project overall remains cost effective (RI Test BCR > 1.0).

### **High-Efficiency Heating, Cooling and Hot Water Program (Energy Star HVAC)**

- Expand contractor training and provide additional sales resources for contractors to share the benefits of heat pumps with their customers.
- Offer tiered incentives to encourage the purchase of the highest efficiency heat pumps.
- Continue coordination with OER on heat pump incentives to ensure customer clarity and awareness on available incentives.

### **Residential Consumer Products**

- Offer appliance recycling program full program scope to customers for pick-up services to recycle working refrigerators and freezers with add-on dehumidifiers.
- Continue to explore ways to increase program awareness around instant rebates on Most Efficient Appliances; refrigerators, clothes washers & dryers, room air conditioners.
- Continue monitoring EM&V and market data (eg on free-ridership, NTG) to ensure optimization of RCP measures and incentives.

### **Residential New Construction**

- Conduct exit surveys with builders after the completion of each project.
- Enhance partnerships with affordable housing entities such as RI Housing to develop high efficiency construction guidelines and standards for affordable housing.
- Adjust program incentives to account for an increasingly more stringent code baseline, and continue to encourage high efficiency construction, with a goal of setting zero energy as the construction standard in Rhode Island.

### **Home Energy Reports**

- No significant program changes anticipated.

## 2.4 Income Eligible Programs

The Company wants customers who meet the income eligibility requirements and may have a high energy burden and/or difficulty paying their electric or gas bills to participate in, and benefit from, the Company's energy efficiency programs. Therefore, the income-eligible sector is designated as a unique sector and funding for this sector is subsidized by both non-income-eligible residential customers and C&I customers so a larger proportion of income eligible customers can be served.

The Income Eligible Services (IES) Program offers home energy assessments, weatherization services, appliance, and heating system replacements with no customer cost to qualified single-family customers. Customers who qualify for the A-60 rate or for the Low-Income Home Energy Assistance Program (LIHEAP) are eligible to receive all services and equipment upgrades at no cost. The IES Program's services are delivered by local Community Action Program (CAP) agencies who coordinate with outside contractors that perform heating system and appliance replacements and weatherization installations with oversight provided by a Lead Vendor.

The Income Eligible Multifamily Program offers comprehensive energy services for multifamily customers that also meet the criteria for "income eligible" as defined in Attachment 1: Residential and IES Programs, Section 4: Multifamily. These services include energy assessments, incentives for heating and domestic hot water systems, air source heat pumps, cooling equipment, water-saving installations, and smart thermostats. Typically, there are no costs to the customer for these services as most income-eligible upgrades are covered at 100 percent.

2025 anticipated highlights and changes include:

### **Income Eligible Single Family**

- Improvements to appliance measures and delivery, including:
  - Move from MA appliance replacement scheduler to RI CAP scheduler, centralized at one CAP agency.
  - Leverage lead vendor's experience in appliance delivery to realize bulk purchase of appliances at discounted cost.
  - On board additional RI appliance delivery vendors.
- Continue work on addressing pre-weatherization barriers
  - Improve data collection.
  - Work with DHS to continue leveraging PWB funding.
- Build upon and continue flexible program delivery by allowing overflow vendor and inter-agency referrals.
- Coordinate with OER on leveraging and braiding IRA funds.
- Continue building upon equity work, commitments, and tracking.
- Continue work towards hitting targets for electric resistance heat to heat pump conversions.

### **Income Eligible Multifamily**

- Income Eligible Multifamily is combined with Multifamily above.

## 2.5 Commercial and Industrial Programs

The C&I Programs offer incentives, rebates, technical assistance, and financing to customers that look to reduce energy consumption, cut greenhouse gas emissions, or meet corporate sustainability goals. To reach customers, the Company uses a market sector approach, whereby specific energy efficiency initiatives are developed to meet the needs of different market segments (e.g., the Grocery program, Chain Restaurants, and the Industrial Initiative). In addition to the market sector approach, the Company also provides Prescriptive and Custom offerings. The Prescriptive offerings are available for a wide variety of standardized energy-efficient products with “deemed” savings values, such as lighting equipment, air compressors, variable speed drives, and stream traps. While the Custom offerings are available for any energy conservation measure that is not covered under alternative pathways.

In planning the Commercial and Industrial programs, the Company evaluates customer needs, market dynamics, and State policy objectives to determine how program offerings can be enhanced or adjusted to drive market transformation across multiple end-uses. Another central component to the planning process is the development of strategies that advance more equitable services, particularly within the Small Business and Multifamily Programs.

2025 anticipated C&I changes include:

- Addition of new measures to reflect code impacts, regulations, emerging technologies and greater comprehensiveness
  - addition of mid-stream program food service measures
  - grocers turning to natural refrigerants such as CO<sub>2</sub> in response to compliance with hydro-fluouro carbon regulations
  - adjustment to the LED measure lives in response to the January 1, 2025 ban on mercury-containing linear fluorescent lamps
  - continued deployment of the custom and prescriptive weatherization tools
  - expansion of Small Business measures such as smart power strips and energy efficient hand dryers to achieve greater savings
- Continue focus on initiatives to generate greater savings
  - continued promotion of the Small Business Main Street campaigns, building on the enhancements and modifications made in 2024, including continued outreach to local and community organizations that can help drive participation by smaller businesses (i.e. using less than 100,000 kWh annually)
  - continued refinement of the Building Analytics Program reflecting the lessons learned in 2024
- Continue engagement with stakeholders
  - development of a public-facing dashboard showcasing program activity by town and zip code
  - outreach to community groups to promote the Small Business Main Street campaigns
- Continue program refinement to further streamline the programs for customers, vendors, and program staff
  - Process evaluations of the custom Retrofit Program process and New Construction Program which will provide insights on how the New Construction Program and custom process can be refined and improved for customers and trade allies

- Lighting Market Research study
- Market characterization/sizing of small business customers heating with electric resistance heat, delivered fuels and natural gas

## 2.6 Multi-year Strategies

In the LCP Standards adopted by the PUC in Docket 23-07-EE, the PUC directs the Company to identify investment strategies for which implementation and budget requests (or revenue collection) are expected to span multiple years. In addition to the budgets and targets required for the rest of the portfolio, the PUC directs that the Company may separately provide budgets and goals for multi-year strategies. The requirement applies to both the Annual and Three-Year Energy Efficiency Plans. There is no such multi-year commitment envisioned for 2025.

## 2.6 Cross-Cutting Programs

### 2.6.1 Equity

Equity is a key priority for the 2025 Plan. The Company is committed to ensuring that all Rhode Islanders – regardless of race, income, gender, ability, or other aspects of social status – can access and benefit from energy efficiency. The Company planned and developed its 2025 Energy Efficiency Portfolio through an active process to identify and address the barriers that residents, businesses, and communities face in participating in program offerings.

Since 2021, Rhode Island Energy and OER have co-hosted a series of Equity Working Group (EWG) meetings facilitated by the Green & Healthy Homes Initiative. The EWG is comprised of community representatives from a diverse array of community-based organizations, small businesses, non-profit organizations, CAPs, resident advocacy groups and alliances, municipal and state entities, and diversity equity and inclusion (DEI) industry experts. The purpose of these meetings is to discuss how the Rhode Island energy efficiency programs can more equitably serve residents and businesses. As a result of these discussions, the EWG provides the Company with written recommendations to advance equity in the planning, design, and delivery of its energy efficiency programs. These recommendations include specific, actionable equity strategies for the Company’s programs as well as a list of metrics and targets to track performance. The recommendations, strategies, and metrics are included in an annual report for inclusion in this plan. Please see Attachment X for the 2024 Rhode Island Energy Efficiency Equity Working Group Report.

The Company weighs its program priorities, customer knowledge, and the EWG’s recommendations to identify specific equity efforts within each energy efficiency plan. In 2024, the Company focused on the following areas:

1. **Outreach through non-profit organizations.** The Company developed a Residential Equity Outreach Assessment that engaged the City of Central Falls and the non-profit organization Progreso Latino to conduct direct outreach and education to landlords to address barriers that they and renters experience when participating in the Company’s energy efficiency programs.
2. **Justice40 Initiative.** The Company developed processes and capabilities to measure program participation in Justice40 communities to better align with federal reporting standards and initiatives. Leveraging input from the EWG and stakeholders, the Company

also developed specific metrics that are now included in the quarterly and annual energy efficiency reports.

3. **Equitable marketing strategies.** The Company worked to expand energy efficiency education to a Latina radio station in Spanish. Engagement with the Latina community has made the Company aware that radio is a preferred resource for relaying community information as opposed to print and email formats.
4. **Removing barriers to participation.** In Q1 2024, the Company worked with the EWG to prioritize and pursue several strategies to foster equitable access and participation across its programs:
  - i. Building a network of community-based partners that conduct marketing and outreach and provide programs and services in the Equity Communities
  - ii. Developing a strategic plan with landlords & multifamily property owners around how Rhode Island Energy will serve and reach multifamily landlords
  - iii. Coordinating with the Rhode Island Department of Health (RIDOH) on the development of its rental registry
  - iv. Working with partners to strategically align, braid, and leverage healthy homes programs to address pre-weatherization barriers
  - v. Working with partners to explore new sources of housing rehabilitation funding
  - vi. Continuing to fund workforce development partnerships
  - vii. Hosting workshops for contractor businesses to increase availability and support for vendors to become certified Minority/Women-owned Business Enterprises
  - viii. Increasing the number of Main Street or outreach efforts conducted in zip codes with lower historical participation in the Small Business Direct Install program
  - ix. Retaining financing offers for small-business customers to overcome upfront cost barriers
  - x. Efforts to serve small businesses in tandem with the Central Falls Residential Equity Outreach Assessment
5. **Equitable Workforce Development.** The Company also aligned on and pursued additional strategies to develop a workforce that reflects the communities that it serves. Please see section 2.6.2 for additional details.
6. **Energy efficiency equity metrics.** In Q1 2024, the Company engaged in an iterative process with the EWG to prioritize and establish several energy efficiency equity metrics to measure

performance across its programs. The Company began reporting out on these metrics in 2024 and intends to refine, enhance, and continue reporting throughout 2025. Please see the following groupings and metrics below.

Single Family Programs Participation (EnergyWise, Income Eligible Services):

1. # of Home Energy Audits Completed
  - a. Broken down by Justice40 vs non-Justice40 communities
  - b. Broken down by renters vs non-renters
2. # of Weatherization Projects Completed
  - a. Broken down by Justice40 vs non-Justice40 communities
  - b. Broken down by renters vs non-renters

Multifamily Programs Participation (EnergyWise Multifamily, Income Eligible Services Multifamily):

3. # of Home Energy Audits Completed
  - a. Broken down by Justice40 vs non-Justice40 communities
4. # of Weatherization Projects Completed
  - a. Broken down by Justice40 vs non-Justice40 communities

Pre-Weatherization Barriers:

5. # of Audits with Pre-Weatherization Barriers Detected
  - a. Broken down by pre-weatherization barrier type for EnergyWise Single Family program
  - b. Broken down by Community Action Program service territory for Income Eligible Services Single Family program

Microbusiness & Small Business Participation:

6. # of Eligible Customers Participating in Small Business Direct Install
  - a. Broken down by Justice40 vs non-Justice40 communities
7. % of Commercial & Industrial Participation
  - a. Broken down by consumption category

Carrying this momentum forward, the Company has committed to the following equity focus areas and strategies in 2025:

- TBD
- TBD
- TBD

Additionally, the Company will continue to measure its progress and report out on the following energy efficiency metrics in 2025:

- TBD
- TBD
- TBD

The Company will also continue to host the Equity Working Group meetings to ensure a continued focus on equity throughout the year and in support of future planning activities. The Company is committed to X EWG meetings in 2025.

The Company’s energy efficiency equity work is also focused on ensuring qualified customers are moved to the discount rate. Even in community organizations that provide space to educate their customers about energy efficiency, the priority is to assist customers with billing questions and payment plan opportunities. Not surprisingly, the immediate bill relief from the discount rate removes some financial pressure and concern from an energy burdened population. Direct face-to-face contact with customer advocates also builds customer trust. Once that trust is established, it is easier to move the attention of customers to energy efficiency.

Beginning in 2023, the Company began to engage with the Rhode Island Department of Health Equity Zone Initiative through a connection facilitated by the Energy Efficiency Council. The Health Equity Zone Initiative supports place-based approaches to promote healthy communities and improve the socioeconomic and environmental conditions in neighborhoods across Rhode Island. There are 15 Health Equity Zone collaboratives across the state and each zone is overseen by a backbone agency. The Company has previously engaged many of these agencies through the Weatherization Program and the Health Equity Zone Initiative provides an additional opportunity to work with agencies that serve residents who have not historically participated in The Company’s energy efficiency programs. In 2025, the Company will continue to participate in Health Equity Zone events and collaborate with backbone agencies to increase awareness of efficiency offerings.

### 2.6.2 Workforce Development

Clean energy and energy efficiency programs are drivers of job creation in Rhode Island. The Company’s energy efficiency programs support a large clean energy workforce of local and regional vendors, contractors, distributors, and suppliers. It is important that the jobs and economic benefits created from energy efficiency jobs reach all Rhode Island communities, especially Environmental Justice Focus Areas.

The objective for 2025 will be to continue to grow the energy efficiency workforce and support several key sectors:

#### **Energy Auditors**

Increase energy auditor workforce

- Support RCWP pre-apprentice program to grow pipeline of candidates
- Provide BPI training and certification

#### **Energy Code**

Increase training and technical support

- Increase program-approved trainers through “train the trainer”
- Develop on demand online training

- Provide HERS rater training and certification
- Provide resources such as FAQs and technical bulletins on RI Energy's website

### **HVAC Contractors**

Increase and educate workforce

- Increase training on proper sizing, design, and installation of heat pumps
- Engage local HVAC tech programs and provide training

### **Zero Energy**

Increase training and technical support

- Provide residential Zero Energy Homes training
- Provide commercial Zero Energy Building training
- Reimburse local professionals for Certified Passive House Consultant/Builder credentials
- Support the RI Chapter of PHIUS (Passive House US)

## 2.6.3 Multifamily Landlords

The Company plans to promote heat pump upgrades and other applicable energy efficiency measures to building owners and landlords. RI Energy recognizes gaps in current financing offerings, such as a lack of options for landlords in the Multifamily Program. In 2025, the Company plans to work to find effective ways to address these gaps and will continue to work with BlocPower on the new Multifamily Financing Program demonstration.

## 2.6.4 Enhance Financing and Funding Options

The Company currently offers several financing vehicles to customers including the On-Bill Refinancing Loan, Third-Party C&I Financing Loan, HEAT Loan, and financing through the Efficient Buildings Fund. In 2025, the Company will investigate ways in which these offerings can be expanded to serve more customers, including increasing loan limits for comprehensive projects. To make financing more useful in moving projects across the finish line, the Company will provide additional training on available financing mechanisms and how to position them effectively to internal sales staff and trade allies.

In addition to financing, the Company will collaborate with OER to integrate program incentives with state and federal funding. OER will administer \$64 million in funding from the federal IRA in addition to \$25 million from ARPA for its Clean Heat RI Program. The IRA also offers several enhanced tax credits to encourage homeowners to pursue efficiency and electrification measures. Rhode Island Infrastructure Bank, in addition to their \$5 million annual allocation of program dollars, received an additional \$5 million from a 2022 state bond issue to support a small business energy efficiency fund. The Company intends to leverage these outside dollars to encourage greater program participation.



## 2.6.5 HVAC Equipment

The Company will continue to coordinate with OER to leverage additional funding opportunities for energy efficiency measures and projects funded through ARPA and IRA, such as the [Clean Heat RI Program](#). This program is administered by OER and received \$25 million in ARPA funds to provide financial incentives to residential and C&I customers for the purchase and installation of high efficiency electric heat pumps.

The Company will target electric heat resistance heat pump upgrades as outlined in the Company's *Electric Resistance Heating to Air Source Heat Pumps: Implementation Plan for the Income Eligible Sector*. The Company was directed by the Public Utilities Commission to develop the Heat Pump Plan to achieve 750 conversions annually by 2025 with 25 percent of those customers served classified as income eligible. In 2025, the Company will continue efforts to upgrade income-eligible customers.

## 2.6.6 Community-Based Initiatives

The Community Solutions Initiative allows the Project Team to collaborate holistically with a municipality to develop and execute a three-year workplan to reduce energy use in advancement of the municipality's sustainability goals. Community Solutions is an evolution of our successful SEMP Initiative. It expands the partnership model from a single customer to an entire community. The Community Solutions model begins with a memorandum of understanding (MOU) that establishes a non-binding framework for working together, defines energy efficiency savings goals and incentives, and sets priorities for collaboratively engaging residents and businesses in energy efficiency programs. The municipality is linked with a technical assistant who prioritizes City-owned buildings, identifies opportunities and estimates costs and savings. In 2023, the Company signed our first MOU with a participating municipality and for 2025 will look to 1) sign additional MOUs with additional cities 2) apply best practices from these partnerships to program delivery across municipalities regardless of size.

The Main Street Initiative takes a neighborhood approach to driving energy savings through its Mainstreet Initiative. Main street campaigns are planned in six different communities to be served over seven weeks in 2024, including outreach and engagement with community-based organizations. The Project Team will work with stakeholders to plan more campaigns for 2025 based on results and lessons learned. Please see the table below for the specific communities, dates and participation goals.

2024 Small Business Main Street Campaigns

Community	Estimated Duration	Participant Goal
Providence	May 13-24	60
Pawtucket	June 10-21	40
Cranston	July 15-19	40
West Warwick	August 5-9	30
Middletown/Newport	September 16-20	40

A new energy efficiency advocate will be fully engaged in 2025. This bilingual advocate will be embedded within community-based organizations to provide training to each organization's team about the intersection of energy with health and safety. The organizations can then support their communities in identifying ways in which energy efficiency can help and how to access opportunities.

### 2.6.7 Codes and Standards Support

Because the state adopted a new International Energy Conservation Code (IECC) in 2022, compliance activities in 2025 will include education and resources related to the newly adopted code. The Company is also exploring opportunities to conduct research and analysis in support of future RI state codes and standards updates (including reversal of weakening amendments in state code relative to IECC). These activities will not include advocacy, and expenditures will be relatively limited.

### 2.6.8 Participation and Outreach

In 2025, the Company will continue to drive participation through two main pathways – targeted programs and broad-based programs. Further detail on outreach plans for 2025 will be provided as the efficacy of current outreach efforts is evaluated in 2024.

## 3. PILOTS, DEMONSTRATIONS AND ASSESSMENTS

Commercial, industrial, and residential demonstrations, pilots and assessments are all vehicles that may be used to identify, test, analyze, and deliver new innovative solutions and services that are technically feasible, desirable by customers, and viable for inclusion in the portfolio. The Company will continue to systematically review opportunities to add to the portfolio through a consistent and transparent process. Please refer to Attachment 8 for additional details on evaluations for demonstrations, pilot, and assessments. Consistent with PUC Guidance, the Company uses the following definitions for demonstrations, pilots and assessments.

### 3.1 Demonstrations

A demonstration will test the feasibility of a new product or offering for inclusion in existing programs. It is generally expected that demonstrations will be less time and resource intensive than pilots, since generally there is greater certainty around a narrow, incremental idea added to a program rather than a totally new set of offerings. Savings associated with demonstration projects may contribute to shareholder incentives. Demonstrations may be evaluated with either an independent or a vendor evaluation.

### 3.2 Pilots

A small-scale, targeted program that is limited in scope, time, and spending and is designed to analyze the feasibility of a future program or rate design. Pilots are designed to test technologies and approaches to energy management not included in the core energy efficiency programs that could potentially become a new, standalone program. Given the scope of adding a new core program to the Company Energy Efficiency Portfolio, it is likely that pilots will require a long-term commitment and broader set of stakeholder input. Savings associated with pilots will not contribute to shareholder incentives. Pilots may be evaluated with either an independent or a vendor evaluation.

### 3.3 Assessments

An assessment will be deployed for solutions that address a particular gap or program need but have significant uncertainty around the effectiveness or potential of the solution to realize savings. Because of the uncertainty, assessments will not include field demonstrations or customer installations. Instead, assessments will focus on information gathering to equip Company staff to make a more informed decision of whether and how to proceed with the idea. It is possible that an assessment could recommend further demonstration of the idea or determine the solution should exit the review process. Savings associated with assessments may not contribute to shareholder incentives. Assessments may be evaluated with an independent evaluation, vendor evaluation, or internal review.

The Company will coordinate efforts with internal and external stakeholders, such as EM&V, Customer Energy Management, the OER, and the EEC, at various points in the development process to ensure appropriately rigorous evaluation and attention is given to each demonstration, pilot and assessment. Updates will be provided to OER and the EEC consultant team on a quarterly basis and the Company will solicit input during its collaborative annual planning process.

### 3.4 2025 Demonstrations, Pilots and Assessments

The Company will evaluate opportunities for demonstrations, pilots, and assessments for 2025.

## 4. EVALUATION, MEASUREMENT AND VERIFICATION PLAN

EM&V provides independent verification of impacts to ensure that savings and benefits claimed by the Company through its energy efficiency programs are accurate and credible. EM&V also provides insight into market characteristics and guidance on program design to improve the delivery of cost-effective programs.

To verify the impacts of programs on energy savings, the Company hires independent third-party consulting firms to regularly conduct evaluation studies as part of its EM&V process. These evaluations incorporate industry standard methods such as engineering analysis, metering analysis, billing analysis, site visits, surveys, and market studies to realize the actual energy savings of a measure. The EEC and OER provide direct oversight of each evaluation study conducted. Every year, the results of the studies are used to update the benefit-cost calculations during planning. Attachment 3: EM&V Plan lists the evaluations that have occurred since 2010 that are still being used and their influence on program planning. All completed evaluations are submitted electronically to the PUC; final reports of evaluations completed in prior years are available in the dockets for previous years, on the EEC website, or upon request.

The areas proposed for study in 2025 will be chosen based on several factors: the relative amount of savings in that program or end use, the vintage of the most recent evaluation study, the relative precision of the recent evaluation study, recommendations from previously completed studies, and the available evaluation budget. This list may be added to as the year progresses, and different evaluation priorities are identified. In particular, the Company will consider the value of using evaluations from other jurisdictions as well as adding Rhode Island-specific impact or process evaluations, as appropriate, that will help inform the Company's efforts towards achieving the goals of Least Cost Procurement. Several EM&V areas of interest were

highlighted in the three-year plan and these will be incorporated into 2025 evaluation planning, if appropriate.

## 5. COORDINATION WITH OTHER ENERGY POLICIES AND PROGRAMS

This section will continue to describe the ways that the energy efficiency programs coordinate with, influence, and are influenced by other dockets before the RI PUC and by state and Company policies. At this time the Company anticipates several areas of continued focus and coordination will inform the plan.

### 5.1 System Reliability Procurement

There are two points of integration between energy efficiency and system reliability procurement. First, demand response is integrated into system reliability procurement, which prompts coordination between energy efficiency program staff and system planning team members. This coordination includes, but is not limited to, supporting market engagement efforts for non-wires and non-pipes solutions, conducting locational outreach for energy efficiency measures that may preemptively alleviate grid needs to some extent, and supporting internal evaluation of energy efficiency as a non-wires or non-pipes solution. The Company will coordinate internally through overlapping staffing assignments and anticipates support for coordination through external stakeholder engagement. Second, energy efficiency may be a potentially viable solution to system needs. The system reliability procurement process evaluates the ability of energy efficiency to resolve system needs either partially or fully in a manner that less than the cost of the best alternative utility reliability procurement solution. In this manner, energy efficiency coordinates with system reliability procurement to potentially mitigate specific system needs as they arise.

### 5.2 Advanced Metering Functionality and Grid Modernization

The increased availability of more near real-time customer energy usage data, if enabled by AMF deployment, will allow for enhancements to energy-efficiency program design and implementation. Currently, the Company's plan for AMF meter deployment if approved begins with a "Solution Validation" phase, installing approximately 500 meters starting in early 2025, followed by continual deployment expected to go through mid-2026. Therefore, this Annual Plan does not include activities that rely on territory-wide deployment of AMF. However, throughout 2025, the Company will identify activities which may help lay the groundwork for implementing program enhancements which AMF will enable in future years. The Company will explore the possibility of engaging customers who receive AMF meters in 2025 in pilot/demonstration/assessment activities, but this is dependent on the progress of the meter/backend network deployment, and the efficiency team will coordinate with the AMF team to determine what is possible. The intent of such activities would be to increase participants', stakeholders', and the Company's comfort and familiarity with targeted programs and pay-for-performance (P4P) programs. As these are foundational program enhancements enabled by AMF, laying the groundwork for these concepts in 2025 should help facilitate a smooth implementation of AMF-enabled enhancements once they are available.

### 5.3 2021 Act on Climate

Through the 2021 Act on Climate, the State of Rhode Island set mandatory, enforceable, statewide, economy-wide greenhouse gas emissions reduction targets of 45 percent below 1990 levels by 2030, 80

percent below 1990 levels by 2040, and net-zero emissions by 2050. Although the Act identifies the State Administration as the obligated entity that takes on responsibility of achieving these mandates and consequences for not achieving them, we recognize that we – the predominant electric and gas distribution utility that administers energy efficiency and renewable energy programs – have a critical role to play in supporting and driving decarbonization.

In alignment with the State’s 2022 Update to the 2016 Greenhouse Gas Emissions Reduction Plan, we can consider Rhode Island Energy’s role, specifically regarding energy efficiency, in how we meet our approaching 2030 mandate across electric, thermal, and transportation sectors. We know that one pathway to economy-wide decarbonization is through electrifying thermal end uses and transportation, while decarbonizing our electricity sources.

Rhode Island’s 100% Renewable Energy Standard requires an increasing percentage of electricity come from renewable energy resources, until meeting 100% in 2033 and beyond. In 2025, there are both decarbonization benefits and affordability benefits from reducing energy use through energy efficiency. Through the end of the decade, the 100% Renewable Energy Standard will erode the decarbonization benefits from energy efficiency (because electricity will be increasingly decarbonized) but will likely increase the affordability benefits of reducing energy consumption (because the cost to decarbonize will be internalized into electricity prices). We also have to consider the interaction between customer-funded energy efficiency programs and price signals of electricity rates: increasing customer-sourced collections will increase electricity prices, which will deter electrification and therefore slow decarbonization. Therefore, our 2025 Annual Plan will start to focus on driving affordability benefits – lower electricity and gas bills – while building coordination structure to shift from using customer funding to non-customer funding to drive decarbonization benefits through layered incentives and rebates.

We must also recognize the value of energy efficiency in building community climate resilience. A family can shelter in place more safely and for longer in a well-weatherized home during a power outage that interrupts heating or cooling systems. Rhode Islanders who are prone to heat-related illness have lower health risks if they have a cooling system and can afford to run it during heat waves. We see our energy efficiency program as helping families, communities, and businesses become more resilient. Therefore, our 2025 Annual Plan will double down on efforts to support communities – especially equity communities – in participating in Rhode Island Energy Efficiency Programs.

These strategies are fully aligned with the State’s priority measures in its most recent Priority Climate Action Plan, available at [www.climatechange.ri.gov](http://www.climatechange.ri.gov). These priority measures include a number of measures aimed to encourage thermal and transportation electrification, energy efficiency in buildings, and climate resilience. Rhode Island Energy will continue to be a productive partner in support the State develop its Comprehensive Climate Action Plan (“2025 Strategy”) over the next year and half. We will push for increasing coordination between Rhode Island Energy Efficiency Programs and state and federal programs so we maximize incentives for our customers and impacts from energy efficiency. We will lend our expertise on customer bill impacts to support a deliberate pacing strategy that puts downward pressure on energy bills. We will work with State partners and stakeholders on program delivery strategies to reach more Rhode Islanders and embody diversity, equity, inclusion, and belonging into all aspects of Rhode Island Energy Efficiency Programs.

Specifically, in building the 2025 Annual Plan, we will work with OER, the Energy Efficiency Council, regulators, and stakeholders to understand various lenses through which we compare costs of energy efficiency with costs of supply; develop a framework for prioritizing funding sources, laying funding streams, and fully addressing the purposes of Least-Cost Procurement; ensuring robust coordination on federal funding opportunities and opportunities to access and layer funding sources; and updating our greenhouse gas emissions accounting and valuation methodology to reflect the impacts of the 2021 Act on Climate and 100% Renewable Energy Standard on decarbonization.

## 5.4 Coordination with State and Federal Incentive Programs

In 2025, the Company will continue to coordinate with OER on the Clean Heat RI (CHRI) Program to facilitate the customer experience, ensure that all available incentives are communicated, and explore synergies in implementation. CHRI includes funding for fuel switching and will complement RI Energy's efforts to promote efficient heat pump adoption for residential, low-income and small commercial customers.

The Company will continue to coordinate with OER with regards to their plans for distributing Inflation Reduction Act (IRA) funding. The Company has had discussions with OER about their preliminary plans for the IRA funding and expects to have more information to inform 2025 planning by the end of Q2 2024.

## 5.5 New Codes and Standards

In January 2023, the Rhode Island House of Representatives passed legislation, [H6101/S0855 Sub A](#), requiring the state to adopt the 2024 International Energy Conservation Code (2024 IECC) within three months of publication, which is currently expected in mid-2024.<sup>27</sup> The law requires adoption of the 2024 IECC with no weakening amendments as well as the creation of a plan for 90 percent compliance within six months for residential and commercial new construction and renovation projects. These residential code changes will most likely shift the new construction and renovation industry away from prescriptive pathways toward a performance-based pathway for compliance (i.e., energy ratings) and as a result, more Home Energy Rating System (HERS) Raters will be needed. The Company increased trainings in 2024 to begin preparing the market for the new code, and this training will continue in 2025 to support code compliance. To support this increase, the Company and OER will leverage IRA funding that assists states in adopting the 2024 IECC and/or a zero-energy code, as well as implementing a code compliance plan. OER will be responsible for administering this funding and the Company will work closely with the agency to support code training efforts.

## 5.6 Future of Gas

The PUC Docket 22-01-NG Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island is ongoing. It is expected the PUC will provide guidance during the summer of 2024 on decarbonization strategies that are actionable in the near-term; affordable and practical for Rhode Island's households, businesses, and essential institutions; account for customer choice considerations; ensure reliable, safe, and cost-effective energy delivery; and support economic development and growth in Rhode Island. This guidance will help inform the 2025 annual planning process.

## 6. CONSISTENCY WITH STANDARDS

### 6.1 Least Cost Procurement Law and Standards

This Annual Plan is submitted in accordance with the Least Cost Procurement Law, R.I. Gen. Laws § 39-1-27.7, the basis for which is the *Comprehensive Energy Conservation, Efficiency, and Affordability Act of 2006*, R.I. Gen. Laws § 39-2-1.2, and the LCP Standards as approved and adopted in Docket No. 23-07-EE in July 2023. The Standards guide how energy efficiency services are delivered in a manner that is optimally cost-effective, reliable, prudent, and environmentally responsible. The Company has assessed each of these requirements in developing this Annual Plan. Details on the Company’s approach to considering each of these elements are included in this section. In addition, further detail on the cost-effectiveness screening of the proposed investments is in Attachment 4: RI Benefit Cost Test, with detail on rate and bill impacts in Attachment 7.

Relative to the assessment of compliance with the Standards presented in the 2024 Annual Plan, the Company anticipates that the following new information may contribute to the assessment of compliance in the 2025 Plan.

- An updated avoided cost study, AESC 2024 was completed in February 2024. This will be used in the benefit-cost model for 2025 and will influence the finding of Cost Effectiveness.
- The company is contemplating a revision to the rate and bill impact analysis, consistent with insights about bill impacts shared by the PUC during the 2024 Plan proceedings. Updates to this analysis will influence the assessment of Prudence.
- The Company’s assessment about Equity may be influenced by ongoing work with the Equity Working Group and EJ40 as well as guidance about equity shared by the PUC during the 2024 Plan proceedings.

### 6.2 Cost Effectiveness

### 6.3 Reliability

### 6.4 Prudence

#### 6.4.1 General Considerations of Prudence

#### 6.4.2 Equity

#### 6.4.3 Parity Among Sectors

#### 6.4.4 Rate and Bill Impacts

### 6.5 Environmentally Responsible

The Company plans to work with Stakeholders throughout the 2025 planning process to update how avoided emissions are tracked within the programs.

### 6.5.1 Emissions Reductions

### 6.5.2 Support for an Environmentally Responsible Local Jobs Infrastructure

### 6.5.3 Raised Customer Awareness of Environmental Issues and the Impacts of their Choices

## 6.6 Cost of Annual Plan Compared to the Cost of Energy Supply

For the 2025 plan the Company will reassess the definition and calculation of cost of supply to reflect PUC input with regards to utility system benefits and delivered fuel impacts. As part of this effort the Company will also refine a methodology for providing justification for measures and programs that exceed cost of supply but support other LCP principles. The Company will engage stakeholders throughout this reevaluation of cost of supply methodology.

## 7. SAVINGS GOALS

### 7.1 Savings Goals

Savings goals will change from those included in the 2025 year of the 2024 – 2026 Three-Year Plan Compliance Filings.

### 7.2 Annual Plan Compared to the Three-Year Plan

The Company anticipates there will be changes to program year 2025 from the illustrative savings, benefits, and costs as shown in the Company’s compliance filings for the Three-Year Plan (3YP). Changes from the Three-Year Plan compliance filings will be explained in the text of the Annual Plan. Top-line values from the Three-Year Plan compliance filings will be shown in the table below for reference.

*Table 1. Comparison of 2025 Electric Portfolio in Three-Year Plan Compliance Filing and 2025 Annual Plan*

Electric Portfolio	2025 in 3YP Compliance Filing	2025 Annual Plan	% Change
Annual Savings (MWh)		-	-
Lifetime Savings (MWh)		-	-
Total Benefits (RI Test)		-	-
Total Spending		-	-
Benefit Cost Ratio (RI Test)		-	-
Cost/Lifetime kWh		-	-
EE Program Charge per kWh		-	-

*Table 2. Comparison of 2025 Gas Portfolio in Three-Year Plan Compliance Filing and 2025 Annual Plan*

Gas Portfolio	2025 in 3YP Compliance Filing	2025 Annual Plan	% Change
Annual Savings (MMBtu)		-	-
Lifetime Savings (MMBtu)		-	-



Cost/Lifetime MMBtu		-	-
Total Benefits (RI Test)		-	-
Total Spending		-	-
Benefit Cost Ratio (RI Test)		-	-
C&I EE Program Charge per Dth		-	-
Residential EE Program Charge per Dth		-	-

### 7.3 Comparison of 2025 Goals with Proposed EEC Targets

This section compares the Company’s proposed goals for 2025 with the targets proposed by the EEC.

## 8. FUNDING PLAN AND BUDGETS

The 2025 Annual Plan will be submitted to the RI PUC on October 1, 2024, consistent with the revised LCP Standards issued by the RI PUC in 2020.

### 8.1 Budgets

Based on guidance from the RI PUC at the December 22, 2020 and January 25, 2022 open meeting, the Company, absent the identification of additional opportunities to drive the prioritized net benefits streams identified by the PUC, anticipates adhering to the 5% target budget increase communicated by the PUC in its approval of the 2021- 2023 Three Year Plan and 2022 Annual Plan. Any adjustments to this target 5% budget increase above levels approved by the RI PUC for 2023 in the most recent energy efficiency hearings and open meeting decisions will need to take into account the Commission’s guidance on prudence and reliability, including an understanding of long-term bill impacts and realization of prioritized benefit streams.

### 8.2 Funding Plan

#### 8.2.1 Energy Efficiency Charges.

No major revisions anticipated.

#### 8.2.2 Fund Balances

No major revisions anticipated.

#### 8.2.3 ISO-NE Capacity Market Revenue

Similar to the past several years, the Company expects that FCM revenues will decline for the 2025 plan year. The current estimate for capacity market revenue in 2025 is \$9,795,081.

#### 8.2.4 RGGI Funding

The Company does not expect any revenue from RGGI for the 2025 plan year.

### 8.2.5 Exceptions to the Natural Gas Energy Efficiency Program Charge

No major revisions anticipated.

### 8.2.6 Budget Management

No major revisions anticipated.

### 8.2.7 Notification of Large Customer Incentives

No major revisions anticipated.

## 9. PERFORMANCE INCENTIVE PLAN

### 9.1 Future Performance Metrics

Throughout the planning process, the Company will engage with stakeholders if updates are needed to this section of the plan regarding future performance metrics.

## 10. ADVANCING DOCKET 4600 PRINCIPLES AND GOALS

No major revisions anticipated. This section will detail how the 2025 Plan advances the principles and goals from Docket 4600.

## 11. CONCLUSION

## 12. MISCELLANEOUS PROVISIONS

No major revisions anticipated. This section will indicate specific caveats and stipulations of the Plan.

## 13. REPORTING REQUIREMENTS

No major revisions to this section are anticipated. This section will provide information on the quarterly and annual reporting on the implementation of the 2025 Annual Plan.

## 14. REQUESTED RULINGS

Consistent with the latest revised LCP Standards, this section will indicate the specific rulings the Company requests of the RI PUC through this filing.

## ATTACHMENTS

Annual Plan Attachment 1. Residential and Income Eligible Energy Efficiency Solutions and Programs

Anticipated revisions to program strategy highlighted in Sections 0 and 0 above. This attachment will continue to provide detail about all elements of the Residential and Income Eligible programs.

## Annual Plan Attachment 2. Commercial and Industrial Energy Efficiency Solutions and Programs

Anticipated revisions to program strategy highlighted in Section 0 above. This attachment will continue to provide detail about all elements of the Commercial and Industrial programs.

## Annual Plan Attachment 3. Evaluation, Measurement & Verification Plan

This attachment will provide an overview of the Evaluation, Measurement & Verification (EM&V) process in Rhode Island, including description of how EM&V studies influence program savings, program designs, and what areas may be explored through EM&V studies in 2025. Below is a list of the EM&V Studies being conducted in 2024:

Sector	Programs	Study names
Res	Multiple	RI-23-RX-ElecHeatCC - Electric Heat Customer Characterization Study
Res	IESF	RI-24-RX-IncEligible - Income Eligible Single Family Impact Evaluation
Res	Multiple	RI-24-RX-MarketResearch – Residential Market Research
C&I	C&I	RI-22-CX-Codes C&I New Construction Baseline Study
C&I	C&I	RI-22-CX-RTUOpt Automated RTU Optimization Demonstration Evaluation

C&I	C&I Gas	RI-23-CG-CustGasPY22 - Impact Evaluation of PY2022 Custom Gas Installations
C&I	C&I Elec	RI-23-CE-CustElecPY22 - Impact Evaluation of PY2022 Custom Electric Installations
C&I	C&I NC	RI-24-CX-CINCPProcess - Process Evaluation of C&I New Construction Program
C&I	Multiple	RI-24-CX-MarketResearch - Commercial and Industrial Market Research
C&I	Multiple	RI-24-CX-ISPRResearch - Commercial and Industrial Industry Standard Practice Research
C&I	SBS	RI-24-CX-SBDashboard - Small Business Data Dashboard
C&I	C&I Retrofit	RI-24-CE-Lighting - Impact Evaluation of Midstream or Downstream Prescriptive C&I Lighting
C&I	C&I	RI-24-CX-CustProcessEval - Process Evaluation of C&I Custom Approach
Cross	Multiple	RI-24-XX-MeasureLife2 - Comprehensive Measure Life Review, Phase II
Cross	Multiple	RI-24-XX-MultiFamCustom - Multifamily Custom Measure Impact Evaluation
Cross	Multiple	RI-24-XX-StandardsSavings - Appliance Standards Gross Savings Review

The EM&V studies planned for 2025 will be listed in this section. Studies will be prioritized based on age of previous study, contribution to savings (currently and in future), changes to program design, and available budget. The list will be discussed and vetted with the EERMC consulting team and the OER.

#### Annual Plan Attachment 4. Rhode Island Benefit Cost Test Description

This section will provide a description of the approach to calculating all component benefits and costs in the RI Test as applied to the Energy Efficiency portfolio, and how the RI Test aligns with the benefit cost framework as detailed in Docket 4600.

#### Annual Plan Attachment 5 and Attachment 6. Electric and Gas Energy Efficiency Program Tables

The Company may make incremental updates to the tables in Attachments 5 and 6. Primarily these will be to provide greater clarity where needed. Specifically, the Company currently plans to have a separate table in Attachment 5 and 6 that presents economic impacts.

#### Annual Plan Attachment 7. Rate and Bill Impacts

#### Annual Plan Attachment 8. Pilots, Demonstrations & Assessments

#### Annual Plan Attachment 9. Cross-Program Summary

No major revisions anticipated.

#### Annual Plan Attachment 10. Definitions

No major revisions anticipated.