



# 2025 Annual Plan Narrative – First Draft

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Consultant Team Presentation

**Date:** June 20, 2024

# Outline



Process Update & Overview

High Level & Cross Cutting Comments

Sector Comments

Council Discussion



# Process Update & Overview

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# 2025 Plan First Draft – Review Process



Rhode Island Energy (RIE or the Company) shared the First Draft 2025 Annual Plan Narrative including:

- 2025 Annual Plan Main Text
- Attachment 1 (Residential & Income Eligible Programs)
- Attachment 2 (Commercial & Industrial Programs)
- Attachment 3 ( Evaluation, Measurement, & Verification)
- Attachment 4 (RI Cost Test)
- Attachment 8 (Demonstrations, Pilots, & Assessments)

**Comments on the First Draft Narrative are due on June 28<sup>th</sup>**

# 2025 Plan First Draft – Review Process



Initial EEC Consultant review primarily focuses on key concerns and areas for improvement for the **2025 Annual Plan Narrative**

The Company will share 2025 Annual Plan Numbers on July 3<sup>rd</sup>



# High Level & Cross Cutting Comments

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# Level of Completeness



Many sections in Main Text left blank and/or carry over  
“No major revisions anticipated” from Plan Outline  
Memo

Inconsistency between Residential & Income Eligible  
and Commercial & Industrial sections of the Main Text

Some Attachments not provided

# Cost of Annual Plan Compared to Cost of Supply



**Reminder:** PUC Ordered Company to assemble a secondary cost-of-supply analysis that focuses on system (i.e. electric and gas) costs and benefits

Company included a high-level justification framework

- Elements of RI Test, Cost of Supply comparison, compliance with LCP Standards, and more

Significant opportunity to improve presentation of this framework

	Standard A	Standard B	Standard C	Etc.
Program A				
Program B				
Program C				



# Rate and Bill Impacts



Plan indicates a revised approach for assessing rate and bill impacts of the Plan

Rate and Bill Impacts Attachment not provided, and content in Main Text is not sufficient for conveying what the revised approach is

Timing a concern if additional detail not provided until second draft or later

# Equity Highlights



The Plan includes several strategies focused on increasing participation in underserved communities

- EE Consumer Advocate support for community-based organizations
- Increased language access through multilingual auditors and surveys
- Promotion of equitable hiring through vendor agreements, with a specific focus on minority- and women-owned businesses
- Collaboration with the Office of Energy Resources Equity Justice Manager to facilitate engagement with nonprofits and community-based organizations

# Equity Highlights



The Plan lacks commentary on how the Company will benchmark participation in underserved communities

- Expect the Equity Working Group (EWG) Report to include a list of metrics and recommendations for tracking trends in participation

Company should commit to specific dates for draft and final EWG Report instead of “in August and September”

# Workforce Development Highlights



Section 2.6.2 of the Main Text details focuses for Workforce Development, informed by the 2023 Workforce Needs Assessment

Meaningful strategies to build a pipeline of energy workers, but lack of robust commentary on increasing workforce diversification

- Will a non-diverse workforce be able to effectively reach and serve diverse communities, which have been underserved by the existing workforce?

# Demos, Pilots & Assessments & Evaluation, Measurement and Verification



## Demonstrations, Pilots and Assessments (DPAs)

- Main text and dedicated Attachment have 2025 activities listed as TBD
- More historical data on how completed DPAs are (or are not) incorporated into standard program offering

## Evaluation, Measurement & Verification (EM&V)

- C-Team has reviewed with the Company's EM&V team a list of potential studies for 2025
- First Draft of Plan does not reflect potential EM&V studies under consideration



# Sector Highlights

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# Residential Highlights



Lack of innovative thinking around ways to improve program outcomes

- Multifamily a key example of this

Many references of continuing research and/or exploring solutions could be improved by committing to actions

New Construction should be moving to all-electric, as has been the case in neighboring states

Commitment to restart moderate income incentives, but lack of detail around plan for addressing concerns raised by PUC in 2024 Plan

# Commercial & Industrial Highlights



Beginning January 1, 2025, will be illegal to sell new pin-base type compact or linear fluorescent lamps

- Mercury ban will raise lighting baselines, thereby limiting viable program offerings and claimable lighting savings

Continued expansion of savings from non-lighting measures/strategies may be at risk due to bottlenecks in workforce capacity

Community Solutions model, in which municipalities are linked to a technical assistant, represents an opportunity to decarbonize schools in environmental-justice communities

Results from two upcoming Custom C&I Process Evaluations (RI and MA) should provide useful findings





# Council Discussion

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# Council Member Discussion



- What changes would the Council like to see included in the Second Draft 2025 Annual Plan?
- Are there areas for improvement which would increase responsiveness to the Council's Priorities?
- Are there highlights in the Plan for which the Company should provide greater detail?



# Appendix

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# Council Priorities for 2025



- Comply with Least Cost Procurement (LCP) Standards
- Comply with the Act on Climate
- Incorporate stakeholder input
- Ensure an effective and efficient Plan development and review process
- Set ambitious energy savings goals
- Increase participation in underserved communities
- Conduct targeted workforce development

# Council Priorities for 2025



- Revisit the cost of supply methodology
- Develop and utilize a framework for justifying programs that exceed cost of supply, but support other areas of LCP Standards
- Ensure robust coordination on Federal funding opportunities
- Update the carbon accounting methodology used in the EE Plans