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

February 24, 2011

Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Energy Efficiency Procurement Standards – Statutory Compliance Matter

Dear Commissioners Germani, Bray, and Roberti

By way of this letter and its attachment, the Energy Efficiency and Resource Management Council, (“EERMC”) respectfully submits to the Commission this statutory compliance matter with regard to the Energy Efficiency Procurement Standards. Pursuant to R.I.G.L. § 39-1-27.7(c)(1), the EERMC recommends making two technical updates to the Energy Efficiency Procurement Standards in order to maintain consistency with recent changes to R.I.G.L. § 39-1-27.7(c)(4)-(6) and the Commission’s recent ruling in Docket 4209.

The EERMC recommends, with the support of the parties to 4209 – the Division of Public Utilities and Carriers, the Office of Energy Resources, National Grid, The Energy Council of Rhode Island (TEC-RI), and Environment Northeast (ENE) – the following:

- *Section 1.2 “EE Procurement Plan Components,” Section 1.2(4)(a)(v)*, replace the reference to distribution rates, with a reference to the fully reconciling funding mechanism pursuant to recently amended R.I.G.L. § 39-1-27.7(c)(5) and the Commission’s Order in Docket 4209.
- *Section 1.2 (4)(b) and Sections 1.3(B)(1) and (2)*, replace “kWh” with “unit of energy” pursuant to recent changes to R.I.G.L. § 39-1-27.7, § 39-1-27.7 (c)(4), and § 39-1-27.7 (c)(6), which establishes the least cost procurement of natural gas efficiency resources.

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Respectfully Submitted,

THE RHODE ISLAND ENERGY EFFICIENCY AND RESOURCE
MANAGEMENT COUNCIL

By its attorney,

/s/ R. Daniel Prentiss


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CERTIFICATE OF SERVICE

I hereby certify that on the 24st day of February, 2011, 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(c)(1).

/s/ R. Daniel Prentiss

R. Daniel Prentiss

Attachment A:

EERMC's Recommended Technical Amendment to the Energy Efficiency Procurement Standards

1. Strike all existing language in Section 1.2(4)(a)(v) and replace with the following:

“funds from the fully reconciling funding mechanism established in the 2010 revision to § 39-1-27.7(c)(5) of the General Laws, namely, a requirement to fully fund cost-effective 3-year plans for energy efficiency procurement, reviewed and approved by the energy efficiency resources management council, and any related annual plans.”

2. Strike “kWh” in Section 1.2 (4)(b) and Sections 1.3(B)(1) and (2) and replace with “unit of energy.”