

September 26, 2014

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: National Grid's 2015-2017 Energy Efficiency and System Reliability Procurement Plan, Docket No. 4522

Dear Ms. Massaro:

The National Consumer Law Center, the George Wiley Center, the National Housing Trust, and Natural Resources Defense Council jointly wish to comment on National Grid's ("NGRID") three-year Energy Efficiency and System Reliability Procurement Plan ("Plan"). Over the past several months, we have been in discussions with NGRID, the Office of Energy Resources ("OER"), and consultants to the Energy Efficiency Resource Management Council ("EERMC"), focusing on areas where we believe that NGRID's energy efficiency offerings for affordable multifamily housing can be improved. At our request, OER set up an informal multifamily working group in which we actively participated.

From our discussions with NGRID, OER, and the EERMC consultants, it is very clear that they all are committed to improving the multifamily programs and to achieving greater savings from this sector. The groups who are submitting these comments work together on multifamily energy efficiency issues in a number of other states, from Maryland to California, and we are quite impressed by the level of cooperation among the key Rhode Island players as well as their dedication to implementing high-quality programs that meet customer needs.

By its nature, the NGRID three-year Plan provides only a high-level overview of the company's goals and planned efforts. The brief discussion of "multifamily services" covers less than one page.¹ However, despite its brevity, it includes some specific proposals that we fully support and that we urge the Commission to approve. At the outset, the Plan highlights that the multifamily sector "still holds considerable potential for efficiency improvements." We strongly agree – in almost every state in the country, there is still a largely untapped potential for savings in this sector.² To better tap that potential, NGRID makes these specific proposals:

¹ Plan, pp. 22-23.

² See, for example, Benningfield Group, "U.S. Multifamily Energy Efficiency Potential By 2020" (Oct. 2009); ACEEE, Report E13N, "Apartment Hunters: Programs Searching for Energy Savings in Multifamily Buildings" (Dec. 2013) (recommending "best practices" to overcome barriers and achieve deeper multifamily savings).

- Providing “more comprehensive . . . and easy-to-understand efficiency services that are available in multifamily buildings of all sizes, including a focus on whole-building gas measures.” We strongly support increasing the focus on whole-building gas measures. In cold climate states like Rhode Island, focusing on the whole building – including the heating and hot water systems – not only yields deeper energy savings but also helps affordable multifamily buildings remain as affordable in the long term.
- “Benchmarking multifamily building energy use.” As part of our efforts to promote energy efficiency investments in affordable multifamily housing, we have worked with Rhode Island Housing (“RIH”), the state’s lead agency for ensuring that all those who live in Rhode Island can afford a healthy, attractive home that meets their needs. From that work, we know that benchmarking is a valuable tool that will allow RIH to prioritize the buildings which are in greatest need of investing in energy efficiency. We therefore applaud NGRID for its commitment to move ahead with its plan to benchmark hundreds of multifamily buildings in the near future.
- “Develop and enhance strong, enduring relationships with multifamily customers (Rhode Island Housing, housing authorities . . .) that will produce reliable and rich pipelines of projects over the next three years.” Housing financing agencies like RIH can be extremely valuable partners for utilities that are investing heavily in energy efficiency because these agencies readily can identify large numbers of multifamily properties already planning to refinance and invest in major renovations. A refinancing event provides the perfect opportunity for NGRID to engage the multifamily owner around energy efficiency improvements, as the owner is already committed to undertaking substantial building upgrades. We support NGRID’s commitment to work with the broad range of affordable housing owners.
- “Develop stable financing options for multifamily customers.” Accessible financing makes it easier for an owner to decide to invest in energy efficiency and also allows NGRID to serve more buildings, by using its available rebates and incentives to leverage borrowed capital. We encourage the Commission to make sure NGRID actually develops new financing tools and makes them available within the next year.

As already noted, the three-year plan is short on detail. We could comment on the many areas in which we would want the three-year Plan’s discussion of multifamily programs to be more specific. However, we are already in discussions with those drafting the one-year Plan due in November and are optimistic that it will contain additional and sufficient detail to fully flesh out the ideas sketched out in the three-year plan.

Overall, we support the multifamily components of NGRID’s three-year plan and urge the Commission’s approval.

Respectfully submitted,

Charles Harak, Esq.
Managing attorney, NCLC
On behalf of George Wiley Center, National Housing Trust and Natural
Resources Defense Council