STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID'S 2015 ENERGY EFFICIENCY PROGRAM PLAN and 2015 SYSTEM RELIABILITY PROCUREMENT REPORT

DOCKET NO. 4527/4528

COMMISSION'S FIRST SET OF DATA REQUESTS

<u>DIRECTED TO EERMC</u>

(December 9, 2014)

Reply by December 12, 2014

COMM 1. Cost-Effectiveness Study, p.6. If the comments and proposed enhancements submitted by the Council to National Grid regarding the first, second and third drafts of the 2015 EEPP (on 9/5, 9/19 and 10/9) were submitted in writing, please provide copies of same. If not in writing, summarize the contents of the Council's comments and proposed enhancements.

Response to COMM 1:

With regard to the summary of comments and proposed enhancements, it is important to note the 2015 EEPP was developed close on the heels of the 2015 - 2017 Procurement Plan. The extensive work on that Plan significantly informed the 2015 EEPP's designs and strategies, limiting the extent of additional input needed in the EEPP relative to other years.

Nevertheless, the comments provided were numerous, and they were not provided to National Grid in the form of a separate summary document. Instead, comments were provided via a "Track Changes" edited version of the three drafts of the 2015EEPP. Proposed changes focused primarily on Attachments 1 and 2. Since these Attachments are over 100 pages for each draft, providing the documentation in this format would require over 300 pages of documentation electronically, and thousands of pages of printed copies.

In summary, the Council's input provided via its Consultant Team in the Track Changes process sought to assure that important areas of emphasis were clearly called out, i.e. to expand language under the Energy *Wise* Single Family program description in order to clearly state Grid's commitment to cross-program promotion of all relevant residential offerings at time of audit. A second focus was to secure a commitment to explore all financing options that may arise beyond the currently available or planned options. A third was to reference explicitly the intention to target and serve "hard-to-reach" customers. The suggestions were in the form of direct insertion of recommended language into the text or via "comment box" notes that the Company would then create language to address. The vast majority of the proposed enhancements were accommodated in the final draft, and where suggestions were not accepted, sufficient justification was provided by National Grid. Additional, more minor input was also provided to

clarify referenced names/roles of stakeholders, industry standards/entities, and product descriptions.

Response prepared by Mike Guerard

COMM 2. Cost-Effectiveness Study, p. 12. Identify the minor errors and feedback that EERMC provided to National Grid regarding the benefit cost model.

Response to COMM 2:

BC Model updates for the 2015 EEPP resulting from C-Team comments and areas flagged for the Company to confirm or adjust include the following:

- Updated customer incentive costs for the large C&I retrofit program
- Updated savings and incentives for LED street lighting
- Coincidence factors and hours-of-use for CFLs and LEDs in the EnergyWise, Income Eligible and Multifamily programs were updated to reflect the latest evaluation study from NMR
- Measure life for replacement refrigerators in the LI program was reduced to account for upcoming federal standard
- Summer coincidence factors, total resource costs, and incentive levels were corrected for efficient TVs in the residential appliances program
- Coincidence factors for CFLs and Tier 1 & 2 homes in the Residential New Construction program were updated
- Deemed energy savings (kwh) was updated for LEDs in the Residential New Construction Program
- Participation estimate for smart strips in the multifamily program were updated in response to comments
- Heat pump savings for the Residential HVAC program were updated to reflect new federal standards
- Heating Penalty added to Furnace ECM Fan in the Residential HVAC program
- Removed 96% AFUE boiler from Residential HVAC program
- Efficiency of baseline stand-alone water heaters updated to reflect new federal standards. This baseline applies to multiple measures in the Residential HVAC program
- Non-energy benefits added to measures in the Income Eligible program

Response prepared by Mike Guerard, with assistance from Sam Huntington and Sam Dent

COMM 3. Did the Council propose changes to any of the draft SRP Plans received from National Grid. If yes, what were they?

Response to Comm. 3:

Yes. The Council did propose changes to an initial draft of the SRP report. This response built on previous communication about the SRP component of the Three Year Procurement Plan.

Aside from a number of minor proposed editing changes, the comments focused on:

- The importance of assessing the potential for Cold Climate Heat Pumps to be considered as an appropriate additional efficiency measure in the targeted area.
- A suggestion that discussion of the partnership with OER regarding deployment of targeted solar installations be expanded.
- Suggested further coordination with efficiency efforts directed at delivered fossil fuels.

Response prepared by Scudder Parker