



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Rhode Island Division of
Public Utilities and Carriers
89 Jefferson Blvd.
Warwick RI 02888
(401) 941-4500

August 8, 2018

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, R.I. 02888

**In Re: Docket No. 4684 – The Energy Efficiency & Resource Management Council –
Revisions to Least Cost Procurement Standards for System Reliability & Energy efficiency
& Conservation Procurement Pursuant to R.I. Gen. Laws § 39-1-27.7**

Dear Luly,

Please find for filing with the Public Utilities Commission (the “Commission”), the State of Rhode Island Division of Public Utilities and Carriers, (the “Division”) Comments following the rejection of the revised Least Cost Procurement Standards of the Energy Efficiency & Resource Management Council’s (the “EERMC”) filing in the above captioned docket.

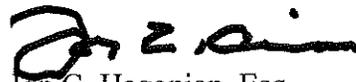
On May 18, 2018 the EERMC filed a copy of its revised Least Cost Procurement (“LCP”) Standards in Docket 4684 for consideration and approval by the Commission. The Standards were crafted by the EERMC and its consultant team at the request of the Commission for an LCP update during the 2018 Energy efficiency Plan approval process. The revised LCP Standards were rejected by the Commission at its July 31st open meeting.

On August 3rd, the Commission staff circulated a new set of proposed LCP standards for which the parties are expected to comment on by August 24th. The process for formulating energy efficiency programs has always relied upon robust stakeholder engagement. The Division has always worked with stakeholders in this process which has produced successful results with respect to energy efficiency. The proposed LCP standards with revisions which were rejected by the Commission were the product of a robust stakeholder process. The Division believes it is

important that the process for review and consideration of the Commission staff's proposed LCP standards should give all stakeholders adequate time to digest these new proposed LCP standards in a meaningful manner. However, the short window of time given here to comment simply may not afford the opportunity for proper engagement in this process. The Division recommends that a timetable and process be developed that will encourage and incorporate stakeholder input at the highest level possible. The Division also recommends that the Commission approve the revised LCP standards filed by the EERMC consultants as an interim measure.

I appreciate your attention in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jon G. Hagopian".

Jon G. Hagopian, Esq.
Deputy Chief Legal Counsel