



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

August 9, 2018

Re: Letter on Docket 4684 and the Implementation of Amended Least Cost Procurement Standards

Dear Ms. Massaro,

We write to you to provide follow-up and clarity on our recent letter regarding the amendments to the Least Cost Procurement Standards. People's Power & Light heartily agrees with the Commission's recent comments from the August 9th open meeting that there was appropriate stakeholder engagement in Docket 4600 proceedings. We were pleased to work with our fellow stakeholders over a series of regular meetings to create the framework to consider benefits and costs with a more holistic lens. PP&L has expressed concern in previous proceedings that several standard cost-tests fail to appropriately account for system-wide metrics and non-energy considerations. We support the finalized Benefit-Cost Framework approved by the PUC for Docket 4600A.

We initially urged caution regarding amending the standards for the 2019 Annual Plan evaluation because we were under the impression that integrating a new, unfamiliar framework in late August for the 2019 Annual Plan could delay the evaluation process and jeopardize timely energy efficiency program offerings to Rhode Islanders. Our team has since connected with National Grid and confirmed that the Company is confident they can work with the appropriate parties to integrate improved standards in the appropriate timeframe. PP&L still requests opportunities be granted for stakeholders like us to work together to understand how the Docket 4600A framework or pieces of the framework would be integrated, specifically for the 2019 Annual Plan and other relevant filings.

We greatly appreciate your consideration of our letter and look forward to next steps to effectively integrate Docket 4600A principles into Rhode Island energy efforts.

Thank you,

A handwritten signature in black ink that reads "Kat Burnham". The signature is written in a cursive style and is enclosed in a light gray rectangular box.

Kat Burnham

Energy Programs Manager