



THE ENERGY COUNCIL OF RHODE ISLAND

Advocating for affordable energy prices and a robust supply of power in Rhode Island

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

RE: Docket 4684; Proposed Energy Efficiency Targets

Commissioners,

Regarding the LCP Standards, as they apply to Docket 4600 framework to energy efficiency programs, we offer the following comments.

We are pleased that the PUC has chosen to differ with the suggested language and intent of the proposed changes by the EERMC. You seemingly require at the very least, a review of the cost of energy supply vs. the cost of energy efficiency test to possibly change on a yearly basis.

As you will recall, during public hearing testimony for the 2018 energy efficiency plan approval process, TEC-RI was outraged to learn at the 11th hour that the EERMC consultant and subsequently the EERMC itself, agreed to changes in the formula that resulted for the first time in ten years of the annual plan, the ratepayer contributory cost be removed from the formula.

The only purpose of this change, was to significantly reduce the threshold of cost vs. supply, therefore lowering the bar, or the "goal post" you may recall from my testimony. The program had been precariously close to not making aggressive goals set by the EERMC, as the low lying fruit had dried up and this trickery, along with other sleights of hand, like relying on "projected technical advancements" for reaching goals was proposed.

We commend the PUC for requiring at the least a yearly review. Of course, we would have preferred an outright rejection of this change to the formula, as it is ridiculous concept to "pretend" that the ratepayer cost is not a cost to be considered in the formula!

Regards,

A handwritten signature in cursive script that reads "Douglas W. Gablinske".

Douglas W. Gablinske
TEC-RI Executive Director