December 20, 2018

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

In Re: Docket 4888 - The Narragansett Electric Company, d/b/a National Grid
2019 Energy Efficiency Program Plan

Dear Luly,

Please find the State of Rhode Island Division of Public Utilities and Carriers, (the “Division”) Response to the Public Utilities Commission’s Record Request for filing in the above captioned docket.
I appreciate your anticipated cooperation in this matter.

Very truly yours,

Jon G. Hagopian
Deputy Chief Legal Counsel
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC:
COMPANY d/b/a NATIONAL GRID:
2019 ENERGY EFFICIENCY PROGRAM PLAN:

DOCKET NO. 4888

THE PUBLIC UTILITIES & CARRIERS FIRST SET OF RECORD REQUESTS
DIRECTED TO
THE DIVISION OF PUBLIC UTILITIES & CARRIERS

(issued on December 11, 2018)

1-1 Based upon the National Grid’s response to PUC Data Request 1-2, what did the Division consider to ensure that Narragansett Electric has not been overpaid for energy efficiency.

Response:

The Division interprets this question to be, more specifically, “in light of the fact that the Company has frequently exceeded its efficiency savings targets in recent years, what did the Division consider to ensure that Narragansett Electric has not been overpaid for energy efficiency.” Further, the Division interprets “overpaid” to refer to the shareholder incentive mechanism and the revenues that it provides to utility shareholders, because the costs of the programs themselves are simply passed through to customers and the Company cannot be overpaid for those.

The Division considered the concern raised by this question in the design of the shareholder incentive mechanism itself. First, the energy efficiency programs are deemed to be cost-effective thereby ensuring that the benefits of the programs exceed the costs. This condition typically holds true even when the efficiency savings targets are exceeded. In fact, the efficiency program costs are capped, so when savings exceed the EE Plan targets customers are getting more net benefits than was originally expected at the time of the Energy Efficiency Plan. So, the customers are certain to enjoy net benefits even when savings are exceeded. For this reason, savings that exceed the EE Plan targets are considered to be a positive outcome from customers’ perspective.

Second, with regard to the shareholder incentives provided to the Company, the incentive amount is 5% of EE program budgets, a relatively small amount. And the shareholder incentive amount is included as a cost in the cost-effectiveness analysis. These features ensure that the
customers are still enjoying net benefits from the efficiency programs, even when the efficiency savings (and the Company’s incentive payments) exceed the EE Plan targets.

Third, the shareholder incentive mechanism does have a cap in place. The amount of shareholder incentive that the Company can earn is limited 6.25% of the program budget once the savings reach 125% of the EE Plan targets. This feature of the incentive mechanism is designed to prevent a windfall to the Company in the event that it is able to achieve savings significantly higher than the EE Plan targets.

Response provided by or under the supervision of Tim Woolf, Synapse Energy Economics, Inc.

Division of Public Utilities and Carriers
By its attorney,

Jon G. Hagopian, Esq. (#4123)
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Dated: December 20, 2018

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of December 2018 that I transmitted an electronic copy of the within Response to Record Request to the attached service list and to Luly Massarc, Division Clerk via electronic mail.

Docket No. 4888 - National Grid – 2019 Energy Efficiency Plan (EEP)
Service list updated 12/3/18
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