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December 4, 2019

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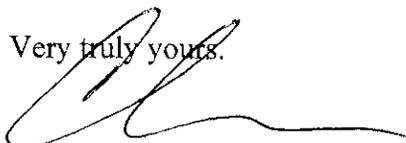
Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

In Re: Docket No. 4979— 2020 Energy Efficiency Program Plan

Dear Ms. Massaro:

Please find for filing with the Commission an original and nine (9) copies of Rhode Island Infrastructure Bank Comments in support of the 2020 Energy Efficiency Plan (the “Plan”) filed by National Grid on October 15, 2019.

Very truly yours.



Christopher P. Vitale, Esq.

Enclosure

c. Docket 4979 Service List



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Jeffrey R. Diehl
Executive Director and CEO

December 2, 2019

Chairperson Margaret E. Curran
Commissioner Marion Gold
Commissioner Abigail Anthony
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket #4979 – 2020 Energy Efficiency Program Plan Comments

Dear Commissioners:

Rhode Island Infrastructure Bank (the “Bank”) respectfully submits the following comments regarding National Grid’s proposed 2020 Energy Efficiency Program Plan (the “Plan”) as filed on October 15, 2019.

With respect to the Efficient Buildings Fund (the “EBF”) program administered jointly by the Bank and the Rhode Island Office of Energy Resources (the “OER”), the Bank supports the Plan as submitted by National Grid and encourages the Commission to adopt the Plan. Since the creation of the EBF in 2015, the Bank has worked with OER to develop and administer the EBF. Through the program, the Bank and OER have provided technical assistance to Rhode Island’s cities, towns and other public agencies to help identify and develop both energy efficiency and renewable energy projects. These projects have created significant energy cost savings, generated significant environmental benefits, and created or supported hundreds of construction jobs around the State.

The EBF receives no funding from the State. The re-investment and leveraging of ratepayer funds that have been allocated by the Commission in recent EE Plans to the EBF has provided the Bank with the ability to provide over \$18,000,000 in low-cost financing for EE projects around the State, with another \$7,000,000 in EE projects expected to close shortly. The Bank has also provided another \$13,000,000 in low-cost financing for renewable energy projects for Rhode Island’s cities and towns using other funds available to the Bank.

Past notable projects include the Edgewood Highland Elementary School where a \$2.2 million loan enabled an investment in new boilers and chillers, new HVAC units and programmable thermostats. These improvements reduced energy consumption by more than 40% while improving air quality, temperature and ventilation. Additional information found here: <https://www.riib.org/node/189>.

Another significant project is in the Town of Westerly. An EBF loan supported the replacement of 2,930 streetlights with energy efficient LEDs, HVAC replacement, controls, LED lighting and building envelope improvements at the Westerly Town Hall, as well as the installation of a solar array to the Department of Public Works building. The lighting upgrades and solar project together save the town \$267,000 in energy costs per year. Additional information found here: <http://www.energy.ri.gov/documents/RIEBF/ebf-westerly-energy-profile-2019.pdf>.



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The Bank believes this program serves an important role in the State's continuing efforts to achieving greater energy efficiency levels. The projects financed through the EBF save taxpayers money in their communities, which continue year-to-year through decreased energy costs. The Bank has also been able to pair EBF financing with financing from its other programs. The City of Newport financed significant improvements to its water treatment facility through the Bank's Clean Water State Revolving Fund but did not have enough bond authorization for that project to include the installation of solar panels and energy efficiency components. The Bank was able to make a concurrent but separate loan from EBF to the City to finance the energy-related portions of the project. This has produced lower costs for the users of the Newport Water system while reducing energy consumption.

We appreciate the opportunity to provide these comments to the Commission and to work with the varied stakeholders to the process that produced the 2020 EE Plan.

Sincerely,