



STATE OF RHODE ISLAND

**OFFICE OF
ENERGY RESOURCES**

July 2, 2020

Chairperson Ronald Gerwatowski
Commissioner Marion Gold
Commissioner Abigail Anthony
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: PUC Docket No. 4991 – Pascoag Utility District’s 2020 DSM Plan Supplemental Filing

Dear Commissioners:

The Office of Energy Resources (OER) respectfully submits these comments in support of Pascoag Utility District’s (PUD) supplemental filing to its 2020 Demand Side Management Plan (2020 DSM Plan), which was approved by the Commission in Docket #4991.

PUD is proposing to adjust its 2020 DSM Plan by increasing consumer incentives for insulation and air sealing measures from 75% to 100% of total project costs for insulation and air sealing, as well as raising the incentive cap to a maximum of \$3,000 for both measures combined. This change is being pursued in response to recent declines in consumer participation for home energy audits and weatherization rebates precipitated by COVID-19.

OER believes that PUD’s proposal is an appropriate response for the utility and its customers in the face of an economy and energy industry still reeling from the impacts of COVID-19. This request will support achievement of PUD’s 2020 DSM goals and the build-out of a pipeline of energy efficiency projects as the economy begins to recover. Helping reduce up-front capital barriers for local consumers will facilitate adoption of these important energy efficiency measures and realization of their economic, energy, environmental, and public health benefits. Enhanced incentives and the reallocation of funds from underutilized budget categories due to the current crisis (e.g. elimination of Community Events) represents a reasonable and proven path forward to regaining program momentum. Furthermore, with virtual audit techniques still being refined across the industry, enhanced incentives guard against variance in project cost estimates and reduces customer risk.

OER is appreciative of PUD’s commitment to ensuring its demand side management programs effectively serve the Pascoag community, especially during these challenging times. We respectfully ask for the Commission’s support in this matter.

Thank you for your consideration.

Sincerely,

Nicholas S. Ucci
Commissioner