

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

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THE NARRAGANSETT ELECTRIC CO. D/B/A	)	
NATIONAL GRID'S 2022 ANNUAL ENERGY	)	DOCKET NO. 5189
EFFICIENCY PLAN	)	
	)	

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**RHODE ISLAND ENERGY EFFICIENCY AND RESOURCE MANAGEMENT  
COUNCIL'S LIMITED SCOPE OBJECTION**

NOW COMES the Rhode Island Energy Efficiency and Resource Management Council (EERMC) and submits this responsive pleading as a result of the recent filing of the Division of Public Utilities and Carriers' (Division) position on the contested issues in this docket. Following review of the entire record in this matter, including the requested approvals of both the Division and National Grid, the EERMC respectfully requests that the Public Utilities Commission (PUC) consider the following.

The Division indicates, in its filing, that the proposed EERMC budget seeks a full three percent allocation from the demand side electric and gas demand-side management funds, and incorrectly states the EERMC's position about the allocation. Specifically, the Division states that the EERMC asserted that the PUC does not possess discretion in this allocation. However, the EERMC does not contest the PUC's discretion. In fact, the EERMC stated on the record that the relevant statute at issue speaks for itself and actually does afford the PUC discretion in the allocation.

The Division goes on to submit that the evidentiary record did not support EERMC's proposed budget, in spite of the fact that EERMC was still submitting evidence into the record in this regard. The EERMC points out that the timing of the Division's filing was premature and

unfair, as the EERMC was still in process of submitting responses to records requests in this docket. Further, the Division points to no evidence in the record, or other rationale to support its position, that the allocation at the full 3% is not justified.

WHEREFORE, the EERMC requests that the PUC consider the foregoing in the process of rendering its decision in this docket.

Respectfully Submitted,  
Energy Efficiency and Resource  
Management Council

By its Attorney,  
DESAUTEL LAW



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Marisa A. Desautel, Esq. (#7556)  
38 Bellevue Avenue, Unit H  
Newport, RI 02840  
401-477-0023  
[marisa@desautelesq.com](mailto:marisa@desautelesq.com)

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on this 23<sup>rd</sup> day of January, 2022, I served a true copy of the within upon all parties on the Service List for Docket No. 5189 Updated December 15, 2021.

