

January 7, 2022

VIA ELECTRONIC MAIL

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

**RE: Docket 5189 – 2022 Annual Energy Efficiency Program Plan
Corrections to Provisional Plan**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed, please find a document entitled “Total Resource Cost Update for Provisional Plan” and attachments to that document which include Refiled Tables E-1 – E-10 for the Provisional Plan; PUC 1-20 Refiled; and PUC 3-1 Corrected (Refiled) for filing in the above-referenced docket.¹

Thank you for your attention to this filing. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

cc: Docket 5189 Service List
Margaret Hogan, Esq.
John Bell, Division
John Hagopian, Esq.

¹ Per the Commission’s request, the Company is providing one copy of this transmittal for the Commission’s file in this docket and six (6) copies, 3-hole punched for the Commission.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

January 7, 2022
Date

**Docket No. 5189 - National Grid – 2022 Annual Energy Efficiency Program
Service list updated 11/29/2021**

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TOTAL RESOURCE COST UPDATE FOR PROVISIONAL PLAN

Corrections to Plan

This memo includes the following attachments:

Refiled Tables E-1 – E-10 for the Provisional Plan (This updated set of tables are referred to as the “Refiled 1-7-2022” tables) (as explained below)

PUC 1-20 Refiled

PUC 3-1 Corrected (Refiled)

Corrections to Provisional Plan

The attached and referenced edits are a result of the Consulting Team to the EERMC flagging for the Company the unintended impact of a Company Total Resource Cost (TRC) modeling convention on planned increases to total TRC values, and therefore to customer contributions, resulting from the Company’s re-allocation of the \$9.1mln included in the Provisional Plan to increased assumed incentive levels for certain measures where incremental volumes and savings were assumed. The Company is grateful for the identification of this issue, and for the opportunity to correct the record ahead of the final three days of hearings.

Summary of Issue

When the Company prepared the Provisional Plan to be filed with the RI PUC, it assumed higher incentive rates for the incremental measures added in the Provisional Plan. When incentive costs were increased, customer contributions should have decreased and overall TRC should have been unchanged. However, as a result of a modeling convention, this increase in the \$/kWh incentive levels also led to assumed customer contribution costs increasing, when, in fact, those customer contributions should have decreased, reflecting the Company assumption that increased incentive share of total measure costs would be required to drive incremental customer adoption of targeted measures. As a result, the “customer contribution” as seen in Table E-5 for these incremental measures was higher than it would have been if the Total Resource Cost had been held constant, and, in the Company’s view, led to an overstatement of likely Total Resource Costs for the entire volume of impacted measures.

This update lowers the assumed customer contribution and Total Resource Costs and therefore increases the overall RI Test BCR in the Provisional Plan Refiled 1-7-2022 tables. As seen below, for the incremental \$9.1M, this update does not impact the implementation budget, total benefits, energy savings, or net eligible PIM benefits - this update only impacts the customer contribution calculation and two measurements (overall benefit cost ratio and cost of supply) that includes these costs. As a result of these changes:

- The benefit cost ratio of the re-allocated \$9.1mln in the initial Provisional Plan, before the application of economic benefits, is now in excess of 1 (in other words, the proposed re-allocation of the \$9.1mln is robustly cost-effective, on its own)
- The lifetime cost of the savings from the incremental measures resulting from the proposed re-allocation of the \$9.1mln included in the Provisional Plan is now less than the cost of alternative supply.

Comparison between original PUC 1-20 and PUC 1-20 with correction

Table	PUC 1-20	PUC 1-20 Refiled	Change
E-2 Budget	\$9,154,399	\$9,154,399	\$ -
E-5 Primary - Total Benefits	\$12,081,700	\$12,081,700	\$ -
E-5 Primary -RI Test BCR	0.99	2.25	1.26
E-5 Primary - Customer Contribution	\$3,007,481	\$(3,791,545)	\$(6,799,026)
E6A - Impacts - Lifetime MWh	59,665	59,665	-
E8A – Net Eligible PIM Benefits	\$8,309,722	\$8,309,722	\$ -

At the measure level, Total Resource Cost (TRC) represents the total cost of implementing a measure – including incentives plus customer contribution. The reason that the “customer contribution” goes from positive to negative in the revised response to PUC 1-20 is that when the Company increased the \$/kWh incentives cost for the measures in Provisional Plan, the TRC of these measures was originally assumed to have increased in proportion to the incentive increase due to the Company’s modeling convention.

The issue with this convention is that the measure cost should remain fixed (or increase very marginally), and the incentive should simply cover a greater portion of the costs. For example, if a particular incentive for a retrofit measure increased from \$0.30/kWh to \$0.40/kWh (a 33% increase), in the Company’s planning tools the TRC is assumed to increase from \$0.60/kWh to \$0.80/kWh. While the incremental savings achieved through projects funded by this increased incentive might come at a marginally higher cost, it is erroneous to assume that the TRC for **all** projects increase. Essentially, the TRC should remain fixed, potentially with a marginal increase. Thus, in the refiled response to PUC 1-20, the Company has reverted the TRCs to the levels in the original filed plan and simply assumed greater incentive levels.

Implications

After making these adjustments to the TRC, the spend associated with all but two measures achieve BCRs >1. Thus, these should be included in the Provisional Plan 2 under the PUC's guidance in developing this version of the plan. The two measures that do not achieve BCRs >1 are Small Business Direct Install Heat Pumps and Upstream Heat Pumps (Packaged). The total cost of these two measures is \$620,079.

Table E-1 - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Electric DSM Funding Sources in 2022 by Sector
\$(000)

	Income Eligible Residential	Projections by Sector Non-Income Eligible Residential	Commercial & Industrial	Total
(1) Projected Budget (from E-2):	\$17,077.9	\$36,282.7	\$69,264.9	\$122,625.5
Sources of Other Funding:				
(2) Projected DSM Commitments at Year-End 2021:	\$0.0	\$0.0	\$0.0	\$0.0
(3) Projected Year-End 2021 Fund Balance and Interest:	(\$17.5)	(\$6,770.1)	\$13,236.9	\$6,449.3
(4) Projected FCM Net Revenue from ISO-NE:	\$479.2	\$5,690.2	\$8,083.2	\$14,252.7
(5) Total Other Funding:	\$461.7	(\$1,079.9)	\$21,320.1	\$20,702.0
(6) Customer Funding Required:	\$16,616.2	\$37,362.5	\$47,944.8	\$101,923.5
(7) Forecasted kWh Sales:	246,778,762	2,930,118,727	4,162,361,309	7,339,258,798
(8) Energy Efficiency Program charge per kWh, excluding uncollectible recovery:				\$0.01388
(9) Proposed SRP Opex Factor per kWh, excluding uncollectible recovery:				<u>\$0.00000</u>
(10) Total Proposed Energy Efficiency Charge per kWh, excluding uncollectible recovery:				\$0.01388
(11) Currently Effective Uncollectible Rate				1.30%
(12) Proposed Energy Efficiency Program Charge per kWh, including Uncollectible Recovery:				\$0.01406
(13) Currently Effective Energy Efficiency Program Charge per kwh				<u>\$0.01113</u>
(14) Proposed Adjustment to Reflect Fully Reconciling Funding Mechanism				\$0.00293

Notes:

- (1) Projected Budget from E-2 includes OER and EERMC costs allocated to each sector based on forecasted sales.
- (2) DSM Commitments are projects that are under construction with anticipated completion in 2022.
- (3) Fund balance projections include projected revenue and spend through year end with Income Eligible sector set to \$0 through projected subsidization from other sectors, minus commitments which are illustrated separately on line (2). The fund balance includes a \$124,135 credit from shareholder funds to the fund balance which the Company plans to make prior to February 1, 2022 based on the Company's response to PUC 5-4 part e. The fund balance also assumes a transfer of \$5,000,000 to the Rhode Island Infrastructure Bank (RIIB), approved in the 2021 Annual Plan, to be made in early 2022. Note that these funds have not yet been transferred to RIIB, however the Company anticipates, subject to PUC approval, transferring these funds given that the Company received a written request from RIIB on December 30, 2021, and is currently working with RIIB in order to ensure that all required documentation has been provided and is in order prior to completing the transfer.
- (4) The total projection of FCM revenue is allocated by kWh sales to each sector. FCM Revenue includes an estimated \$332,804 penalty. See prefiled testimony for additional details.
- (5) Line (2) + Line (3) + Line (4)
- (6) Line (1) - Line (5)
- (7) Per Company Forecast
- (8) Line (6) ÷ Line (7), truncated to 5 decimal places
- (9) Truncated to 5 decimal places
- (11) Proposed SRP Opex Factor is \$0.00000.
- (10) Line (8) + Line (9)
- (11) Uncollectible rate approved in Docket No 4770.
- (12) Line (10) ÷ (1-Line (11)), truncated to 5 decimal places
- (13) Currently Effective EE Charge includes System Reliability Factor and uncollectible recovery.
- (14) Line (12) - Line (13)

Table E-2 - PROVISIONAL PLAN - Refined 1-7-2022
National Grid
2022 Electric Energy Efficiency Program Budget (\$000)

	Program Planning & Administration	Marketing	Cost of services and product rebates/incentives provided to customers	Sales, Technical Assistance & Training	Evaluation & Market Research	Total Performance Incentive	Grand Total
Non-Income Eligible Residential							
Residential New Construction	\$91.7	\$23.6	\$800.9	\$504.2	\$79.9		\$1,500.3
ENERGY STAR® HVAC	\$100.4	\$279.6	\$3,734.7	\$485.9	\$262.3		\$4,862.8
EnergyWise	\$403.1	\$373.6	\$13,289.6	\$1,315.4	\$282.0		\$15,663.7
EnergyWise Multifamily	\$100.8	\$74.3	\$2,613.8	\$407.0	\$40.4		\$3,236.3
Residential Consumer Products	\$83.7	\$464.3	\$1,724.7	\$500.7	\$22.2		\$2,795.6
Home Energy Reports	\$55.9	\$13.1	\$0.0	\$2,551.5	\$20.8		\$2,641.3
Residential ConnectedSolutions	\$38.2	\$11.3	\$1,356.1	\$368.4	\$37.4		\$1,811.5
Energy Efficiency Education Programs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0		\$0.0
Residential Pilots	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0		\$0.0
Community Based Initiatives - Residential	\$33.7	\$125.2	\$96.2	\$0.0	\$0.0		\$255.1
Comprehensive Marketing - Residential	\$1.3	\$246.7	\$0.0	\$0.0	\$0.0		\$247.9
Residential Performance Incentive	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Subtotal - Non-Income Eligible Residential	\$908.8	\$1,611.8	\$23,615.9	\$6,133.0	\$744.9	\$0.0	\$33,014.5
Income Eligible Residential							
Single Family - Income Eligible Services	\$337.0	\$135.0	\$10,756.0	\$1,966.0	\$72.5		\$13,266.5
Income Eligible Multifamily	\$114.1	\$14.1	\$3,024.0	\$344.1	\$39.8		\$3,536.1
Income Eligible Performance Incentive	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Subtotal - Income Eligible Residential	\$451.1	\$149.2	\$13,780.0	\$2,310.1	\$112.3	\$0.0	\$16,802.7
Commercial & Industrial							
Large Commercial New Construction	\$226.5	\$306.8	\$9,545.4	\$1,942.2	\$432.9		\$12,453.6
Large Commercial Retrofit	\$781.1	\$239.5	\$22,865.4	\$5,605.02	\$816.3		\$30,307.4
Small Business Direct Install	\$235.0	\$244.0	\$8,688.6	\$308.7	\$256.0		\$9,732.3
Commercial ConnectedSolutions	\$96.5	\$6.8	\$4,102.6	\$180.7	\$0.0		\$4,386.6
Commercial Pilots	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0		\$0.0
Community Based Initiatives - C&I	\$11.2	\$41.7	\$32.1	\$0.0	\$0.0		\$85.0
Finance Costs	\$0.0	\$0.0	\$2,000.0	\$0.0	\$0.0		\$2,000.0
Commercial Workforce Development	\$0.0	\$0.0	\$0.0	\$157.5	\$0.0		\$157.5
Commercial & Industrial Performance Incentive	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$5,500.0	\$5,500.0
Subtotal - Commercial & Industrial	\$1,350.3	\$838.8	\$47,234.0	\$8,194.1	\$1,505.2	\$5,500.0	\$64,622.3
Regulatory							
OER	\$1,911.5	\$0.0	\$0.0	\$0.0	\$0.0		\$1,911.5
EERMC	\$1,274.4	\$0.0	\$0.0	\$0.0	\$0.0		\$1,274.4
Rhode Island Infrastructure Bank	\$0.0	\$0.0	\$5,000.0	\$0.0	\$0.0		\$5,000.0
Subtotal - Regulatory	\$3,185.9	\$0.0	\$5,000.0	\$0.0	\$0.0	\$0.0	\$8,185.9
Grand Total	\$5,896.1	\$2,599.8	\$89,630.0	\$16,637.2	\$2,362.3	\$5,500.0	\$122,625.5

Notes:

- (1) 2022 Large Commercial Retrofit Commitments (\$000):
- (2) For more information on Finance Costs, please refer to Attachment 2, Section 9.
- (3) OER and EERMC total 3.0% of customers' EE Program Charge collected on Table E-1, minus 3%.
- (4) Finance Costs are detailed in Table E-9. Finance Costs include an injection of \$2M into the Large C&I Revolving Loan Fund. Without this injection the Large C&I Revolving Loan Fund is projected to be negative by the end of 2022.
- (5) Demonstrations and Assessments budgets are included in specific program level budgets listed above. More information on Demonstration and Assessments descriptions, budgets, and which program level budget they are included in can be found in Attachment 8.
- (6) Based on the state's System Reliability and Least Cost procurement statute (amended in 2021), funds transferred to the Rhode Island Infrastructure Bank are now classified under Regulatory costs.

Table E-3 - Refiled 1-7-2022
National Grid
Derivation of the 2022 Spending and Implementation Budgets (\$000)

	Proposed 2022 Budget From E-2	Commitments	Regulatory Costs	Performance Incentive	Eligible Sector Spending Budget for Performance Incentive on E-8B	Implementation Expenses for Cost- Effectiveness on E-5
Non-Income Eligible Residential						
Residential New Construction	\$1,500.3					\$1,500.3
ENERGY STAR@ HVAC	\$4,862.8					\$4,862.8
EnergyWise	\$15,663.7					\$15,663.7
EnergyWise Multifamily	\$3,236.3					\$3,236.3
Residential Consumer Products	\$2,795.6					\$2,795.6
Home Energy Reports	\$2,641.3					\$2,641.3
Residential ConnectedSolutions	\$1,811.5					\$1,811.5
Energy Efficiency Education Programs	\$0.0					\$0.0
Residential Pilots	\$0.0					\$0.0
Community Based Initiatives - Residential	\$255.1					\$255.1
Comprehensive Marketing - Residential	\$247.9					\$247.9
Residential Performance Incentive	\$0.0			\$0.0		\$0.0
Subtotal - Non-Income Eligible Residential	\$33,014.5	\$0.0	\$0.0	\$0.0	\$31,178.2	\$33,014.5
Income Eligible Residential						
Single Family - Income Eligible Services	\$13,266.5					\$13,266.5
Income Eligible Multifamily	\$3,536.1					\$3,536.1
Income Eligible Performance Incentive	\$0.0			\$0.0		\$0.0
Subtotal - Income Eligible Residential	\$16,802.7	\$0.0	\$0.0	\$0.0	\$16,802.7	\$16,802.7
Commercial & Industrial						
Large Commercial New Construction	\$12,453.6	\$0.0				\$12,453.6
Large Commercial Retrofit	\$30,307.4	\$0.0				\$30,307.4
Small Business Direct Install	\$9,732.3	\$0.0				\$9,732.3
Commercial ConnectedSolutions	\$4,386.6					\$4,386.6
Commercial Pilots	\$0.0					\$0.0
Community Based Initiatives - C&I	\$85.0					\$85.0
Finance Costs	\$2,000.0					\$2,000.0
Commercial Workforce Development	\$157.5					\$157.5
Commercial & Industrial Performance Incentive	\$5,500.0			\$5,500.0		\$0.0
Subtotal - Commercial & Industrial	\$64,622.3	\$0.0	\$0.0	\$5,500.0	\$54,704.7	\$59,122.3
Regulatory						
OER	\$1,911.5		\$1,911.5			\$1,911.5
EERMC	\$1,274.4		\$1,274.4			\$1,274.4
Rhode Island Infrastructure Bank	\$5,000.0		\$5,000.0			\$5,000.0
Subtotal - Regulatory	\$8,185.9	\$0.0	\$8,185.9	\$0.0	\$0.0	\$8,185.9
Grand Total	\$122,625.5	\$0.0	\$8,185.9	\$5,500.0	\$102,685.6	\$117,125.5

Notes:

- (1) Eligible Sector Spending Budget = Total Budget from E-2 minus commitments, regulatory costs, pilots, assessments, Residential ConnectedSolutions, Commercial ConnectedSolutions, Performance Incentive
- (2) Eligible Sector Spending Budget does not include assessments, see Attachment 8 for assessments budgets.
- (3) Implementation Expenses = Total Budget from E-2 minus commitments and Performance Incentive.

Table E-4 - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Proposed 2022 Budget Compared to Approved 2021 Budget (\$000)

	Proposed Implementation Budget 2022	Approved Implementation Budget 2021	Difference
Non-Income Eligible Residential			
Residential New Construction	\$1,500.3	\$1,611.3	-\$111.1
ENERGY STAR® HVAC	\$4,862.8	\$3,487.8	\$1,375.0
EnergyWise	\$15,663.7	\$15,692.2	-\$28.4
EnergyWise Multifamily	\$3,236.3	\$2,804.3	\$432.0
ENERGY STAR® Lighting	\$0.0	\$5,274.8	-\$5,274.8
Residential Consumer Products	\$2,795.6	\$2,681.2	\$114.4
Home Energy Reports	\$2,641.3	\$2,641.7	-\$0.4
Residential ConnectedSolutions	\$1,811.5	\$1,920.5	-\$109.1
Energy Efficiency Education Programs	\$0.0	\$40.0	-\$40.0
Residential Pilots	\$0.0	\$0.0	\$0.0
Community Based Initiatives - Residential	\$255.1	\$226.2	\$28.9
Comprehensive Marketing - Residential	\$247.9	\$332.7	-\$84.8
Subtotal - Non-Income Eligible Residential	\$33,014.5	\$36,712.7	-\$3,698.1
Income Eligible Residential			
Single Family - Income Eligible Services	\$13,266.5	\$12,846.1	\$420.5
Income Eligible Multifamily	\$3,536.1	\$3,549.0	-\$12.8
Subtotal - Income Eligible Residential	\$16,802.7	\$16,395.1	\$407.6
Commercial & Industrial			
Large Commercial New Construction	\$12,453.6	\$8,188.2	\$4,265.4
Large Commercial Retrofit	\$30,307.4	\$31,565.2	-\$1,257.9
Small Business Direct Install	\$9,732.3	\$8,883.6	\$848.7
Commercial ConnectedSolutions	\$4,386.6	\$2,990.1	\$1,396.5
Community Based Initiatives - C&I	\$85.0	\$74.5	\$10.4
Commercial Pilots	\$0.0	\$0.0	\$0.0
Finance Costs	\$2,000.0	\$5,000.0	-\$3,000.0
Commercial Workforce Development	\$157.5	\$0.0	\$157.5
Subtotal Commercial & Industrial	\$59,122.3	\$56,701.6	\$2,420.7
Regulatory			
EERMC	\$1,274.4	\$738.5	\$535.9
OER	\$1,911.5	\$738.5	\$1,173.0
Rhode Island Infrastructure Bank	\$5,000.0	\$0.0	\$5,000.0
Subtotal Regulatory	\$8,185.9	\$1,477.0	\$6,708.9
TOTAL IMPLEMENTATION BUDGET	\$117,125.5	\$111,286.3	\$5,839.1
OTHER EXPENSE ITEMS			
Commitments	\$0.0	\$0.0	\$0.0
Company Incentive	\$5,500.0	\$5,500.0	\$0.0
Subtotal - Other Expense Items	\$5,500.0	\$5,500.0	\$0.0
TOTAL BUDGET	\$122,625.5	\$116,786.3	\$5,839.1

Notes:

- (1) Program Implementation Budget excludes Commitments, Company Incentive; derived on Table E-3
- (2) Total Budget includes Implementation, Commitments; illustrated on Table E-3
- (3) The Energy Star® Lighting program year-over-year decrease is due to the phase out of the program in 2022.
- (4) The increased budget for the Large Commercial and Industrial New Construction program can be attributed to a roughly \$3,800,000 increase in incentives for HVAC, controls, industrial process, and other non-lighting measures, plus associated program administration costs to implement a more complex measure mix.
- (5) The Large Commercial Retrofit program decreased primarily due to roughly a \$2,600,000 reduction in lighting incentives due to lower anticipated volume as the market becomes increasingly saturated. The CHP budget also decreased approximately \$500,000 because there was a CHP retrofit in the 2021 plan. This has been partially offset by increased non-lighting incentive budgets and associated program administration costs to implement a more complex measure mix.
- (6) The increase in the 2022 Commercial and Industrial ConnectedSolutions program budget can be attributed to the higher participation in the Daily Dispatch demand response offering. In total, the customer incentive payments represent approximately 98% of the cost associated with this measure.
- (7) The Finance Cost decline is driven by a reallocation of \$5M in RIIB from this line to the RIIB line under regulatory due to the updated the Least Cost Procurement statute (amended in 2021).
- (8) The increase in allocation of funds to the OER is made consistent with the state's System Reliability and Least Cost procurement statute (amended in 2021), which provides that the Commission shall allocate an amount not to exceed three percent (3.0%) from authorized demand-side management gas and electric funds authorized.
- (9) The Rhode Island Infrastructure Bank addition is driven by a reallocation of \$5M in RIIB from the Finance Cost Line to the Rhode Island Infrastructure Bank line under the regulatory sector to comply with the Least Cost Procurement statute (amended in 2021).

Table E-5 - Primary - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Calculation of 2022 Program Year Cost-Effectiveness
All Dollar Values in (\$000)

	RI Test Benefit/ Cost¹	Total Benefit	Program Implementation Expenses²	Customer Contribution	Performance Incentive	¢/Lifetime kWh
Non-Income Eligible Residential						
Residential New Construction	2.07	\$4,232.1	\$1,500.3	\$547.2		13.7
ENERGY STAR® HVAC	2.18	\$14,630.8	\$4,862.8	\$1,848.5		8.6
EnergyWise	1.03	\$16,626.6	\$15,663.7	\$530.6		120.2
EnergyWise Multifamily	1.64	\$6,189.9	\$3,236.3	\$532.0		18.1
Home Energy Reports	2.04	\$5,401.4	\$2,641.3	\$0.0		9.8
Residential Consumer Products	2.21	\$9,713.3	\$2,795.6	\$1,606.6		9.3
Residential ConnectedSolutions	1.59	\$2,886.0	\$1,811.5	\$0.0		N/A
Energy Efficiency Education Programs			\$0.0			
Residential Pilots			\$0.0			
Community Based Initiatives - Residential			\$255.1			
Comprehensive Marketing - Residential			\$247.9			
Non-Income Eligible Residential SUBTOTAL	1.57	\$59,680.0	\$33,014.5	\$5,064.9	\$0.0	18.9
Income Eligible Residential						
Single Family - Income Eligible Services	1.94	\$25,758.0	\$13,266.5	\$0.0		34.5
Income Eligible Multifamily	2.37	\$8,368.1	\$3,536.1	\$0.0		14.5
Income Eligible Residential SUBTOTAL	2.03	\$34,126.2	\$16,802.7	\$0.0	\$0.0	26.7
Commercial & Industrial						
Large Commercial New Construction	3.44	\$39,123.7	\$12,453.6	-\$1,085.4		5.2
Large Commercial Retrofit	2.18	\$79,655.6	\$30,307.4	\$6,231.5		10.7
Small Business Direct Install	1.13	\$13,059.2	\$9,732.3	\$1,792.4		17.2
Commercial ConnectedSolutions	2.42	\$10,621.2	\$4,386.6	\$0.0		N/A
Commercial Pilots			\$0.0			
Community Based Initiatives - C&I			\$85.0			
Finance Costs			\$2,000.0			
Commercial Workforce Development			\$157.5			
C&I SUBTOTAL	1.99	\$142,459.7	\$59,122.3	\$6,938.6	\$5,500.0	10.5
Regulatory						
OER			\$1,911.5			
EERMC			\$1,274.4			
Rhode Island Infrastructure Bank			\$5,000.0			
Regulatory SUBTOTAL			\$8,185.9			
TOTAL	1.75	\$236,265.9	\$117,125.5	\$12,003.5	\$5,500.0	14.5

Notes:

- (1) RI Test B/C Test = Total Benefits from Table E-6A / Program Implementation Expenses from Table E-3
Also includes effects of free-ridership and spillover.
- (2) For Implementation Expenses derivation, see Table E-3.

Table E-5 - Secondary - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Calculation of 2022 Program Year Cost-Effectiveness with Economic Benefits Included
All Dollar Values in (\$000)

	RI Test Benefit/ Cost¹	Total Benefit	Program Implementation Expenses²	Customer Contribution	Performance Incentive	¢/Lifetime kWh
Non-Income Eligible Residential						
Residential New Construction	3.21	\$6,572.5	\$1,500.3	\$547.2		13.7
ENERGY STAR® HVAC	3.32	\$22,314.1	\$4,862.8	\$1,848.5		8.6
EnergyWise	2.04	\$33,073.5	\$15,663.7	\$530.6		120.2
EnergyWise Multifamily	2.89	\$10,882.6	\$3,236.3	\$532.0		18.1
Home Energy Reports	3.15	\$8,333.3	\$2,641.3	\$0.0		9.8
Residential Consumer Products	3.25	\$14,326.0	\$2,795.6	\$1,606.6		9.3
Residential ConnectedSolutions	2.42	\$4,389.5	\$1,811.5	\$0.0		N/A
Energy Efficiency Education Programs			\$0.0			
Residential Pilots			\$0.0			
Community Based Initiatives - Residential			\$255.1			
Comprehensive Marketing - Residential			\$247.9			
Non-Income Eligible Residential SUBTOTAL	2.62	\$99,891.4	\$33,014.5	\$5,064.9	\$0.0	18.9
Income Eligible Residential						
Single Family - Income Eligible Services	2.90	\$38,493.9	\$13,266.5	\$0.0		34.5
Income Eligible Multifamily	3.67	\$12,965.1	\$3,536.1	\$0.0		14.5
Income Eligible Residential SUBTOTAL	3.06	\$51,459.1	\$16,802.7	\$0.0	\$0.0	26.7
Commercial & Industrial						
Large Commercial New Construction	6.44	\$73,246.5	\$12,453.6	-\$1,085.4		5.2
Large Commercial Retrofit	6.56	\$239,678.6	\$30,307.4	\$6,231.5		10.7
Small Business Direct Install	2.43	\$27,949.6	\$9,732.3	\$1,792.4		17.2
Commercial ConnectedSolutions	4.61	\$20,227.9	\$4,386.6	\$0.0		N/A
Commercial Pilots			\$0.0			
Community Based Initiatives - C&I			\$85.0			
Finance Costs			\$2,000.0			
Commercial Workforce Development			\$157.5			
C&I SUBTOTAL	5.05	\$361,102.6	\$59,122.3	\$6,938.6	\$5,500.0	10.5
Regulatory						
OER			\$1,911.5			
EERMC			\$1,274.4			
Rhode Island Infrastructure Bank			\$5,000.0			
Regulatory SUBTOTAL			\$8,185.9			
TOTAL	3.81	\$512,453.0	\$117,125.5	\$12,003.5	\$5,500.0	14.5

Notes:

- (1) RI Test B/C Test = Total Benefits from Table E-6A including Economic Benefits / Program Implementation Expenses from Table E-3
Also includes effects of free-ridership and spillover.
- (2) For Implementation Expenses derivation, see Table E-3.

Table E-5A - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Calculation of 2022 Program Year Cost-Effectiveness with TRC Test
All Dollar Values in (\$000)

	TRC Benefit/ Cost ¹	Total Benefit	Program Implementation Expenses ²	Customer Contribution	Performance Incentive	¢/Lifetime kWh
Non-Income Eligible Residential						
Residential New Construction	1.65	\$3,371.2	\$1,500.3	\$547.2		13.7
ENERGY STAR® HVAC	1.60	\$10,738.0	\$4,862.8	\$1,848.5		8.6
EnergyWise	0.78	\$12,563.7	\$15,663.7	\$530.6		120.2
EnergyWise Multifamily	1.36	\$5,142.9	\$3,236.3	\$532.0		18.1
Home Energy Reports	1.38	\$3,642.0	\$2,641.3	\$0.0		9.8
Residential Consumer Products	1.59	\$7,013.3	\$2,795.6	\$1,606.6		9.3
Residential ConnectedSolutions	1.59	\$2,882.5	\$1,811.5	\$0.0		N/A
Energy Efficiency Education Programs			\$0.0			0.0
Residential Pilots			\$0.0			0.0
Community Based Initiatives - Residential			\$255.1			0.0
Comprehensive Marketing - Residential			\$247.9			0.0
Non-Income Eligible Residential SUBTOTAL	1.19	\$45,353.5	\$33,014.5	\$5,064.9	\$0.0	18.9
Income Eligible Residential						
Single Family - Income Eligible Services	1.66	\$22,034.6	\$13,266.5	\$0.0		34.5
Income Eligible Multifamily	2.03	\$7,186.3	\$3,536.1	\$0.0		14.5
Income Eligible Residential SUBTOTAL	1.74	\$29,220.8	\$16,802.7	\$0.0	\$0.0	26.7
Commercial & Industrial						
Large Commercial New Construction	2.64	\$29,993.6	\$12,453.6	-\$1,085.4		5.2
Large Commercial Retrofit	1.72	\$62,986.7	\$30,307.4	\$6,231.5		10.7
Small Business Direct Install	0.84	\$9,691.3	\$9,732.3	\$1,792.4		17.2
Commercial ConnectedSolutions	2.42	\$10,621.2	\$4,386.6			
Commercial Pilots			\$0.0			
Community Based Initiatives - C&I			\$85.0			
Finance Costs			\$2,000.0			
Commercial Workforce Development			\$157.5			
C&I SUBTOTAL	1.58	\$113,292.8	\$59,122.3	\$6,938.6	\$5,500.0	10.5
Regulatory						
OER			\$1,911.5			
EERMC			\$1,274.4			
Rhode Island Infrastructure Bank			\$5,000.0			
Regulatory SUBTOTAL			\$8,185.9			
TOTAL	1.40	\$187,867.2	\$117,125.5	\$12,003.5	\$5,500.0	14.5

(1) TRC B/C Test omits societal benefits that are monetized in the RI Test, including non-embedded emissions (CO2 and Nox), and economic benefits Also includes effects of free-ridership and spillover.

(2) For Implementation Expenses derivation, see Table E-3.

Table E-6 - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Summary of 2022 Benefits by Program (Energy Efficiency Measures)

	Benefits (000's)																		
	Total	Total (Economic Excluded)	Capacity					Energy				Non Electric				Societal			
			Summer Generation	Capacity DRIPE	Trans	Dist	Reliability	Winter		Summer		Electric Energy DRIPE	Natural Gas	Oil	Other Resource	Non Resource	Carbon	NOx	Economic
Winter Peak	Winter Off Peak	Summer Peak	Summer Off Peak																
Non-Income Eligible Residential																			
Residential New Construction	\$6,572	\$4,232	\$48	\$43	\$94	\$93	\$1	\$369	\$485	\$144	\$110	\$289	\$0	\$325	\$1,304	\$66	\$833	\$28	\$2,340
ENERGY STAR® HVAC	\$22,314	\$14,631	\$182	\$159	\$357	\$353	\$2	\$2,398	\$2,987	\$221	\$185	\$1,833	\$55	\$1,639	-\$16	\$384	\$3,762	\$131	\$7,683
EnergyWise	\$33,073	\$16,627	\$148	\$162	\$291	\$288	\$2	\$267	\$273	\$178	\$157	\$314	\$0	\$8,984	\$233	\$1,267	\$3,605	\$458	\$16,447
EnergyWise Multifamily	\$10,883	\$6,190	\$94	\$79	\$182	\$180	\$1	\$595	\$742	\$106	\$89	\$464	\$0	\$632	\$48	\$1,931	\$1,004	\$43	\$4,693
Home Energy Reports	\$8,333	\$5,401	\$207	\$450	\$365	\$362	\$6	\$646	\$531	\$251	\$183	\$640	\$0	\$0	\$0	\$0	\$1,736	\$23	\$2,932
Residential Consumer Products	\$14,326	\$9,713	\$335	\$719	\$752	\$745	\$9	\$903	\$981	\$485	\$487	\$1,496	\$15	\$42	\$41	\$4	\$2,663	\$37	\$4,613
Non-Income Eligible Residential SUBTOTAL	\$95,502	\$56,794	\$1,014	\$1,612	\$2,041	\$2,022	\$21	\$5,178	\$5,999	\$1,385	\$1,210	\$5,036	\$70	\$11,622	\$1,609	\$3,652	\$13,603	\$720	\$38,708
Income Eligible Residential																			
Single Family - Income Eligible Services	\$38,494	\$25,758	\$275	\$253	\$541	\$536	\$3	\$874	\$967	\$410	\$423	\$801	\$77	\$5,282	\$386	\$11,208	\$3,428	\$295	\$12,736
Income Eligible Multifamily	\$12,965	\$8,368	\$22	\$19	\$43	\$43	\$0	\$789	\$1,008	\$30	\$25	\$554	\$0	\$642	\$53	\$3,958	\$1,137	\$45	\$4,597
Income Eligible Residential SUBTOTAL	\$51,459	\$34,126	\$297	\$271	\$584	\$578	\$3	\$1,663	\$1,975	\$440	\$448	\$1,354	\$77	\$5,924	\$439	\$15,165	\$4,565	\$340	\$17,333
Commercial & Industrial																			
Large Commercial New Construction	\$73,246	\$39,124	\$1,534	\$1,310	\$2,999	\$2,972	\$16	\$5,688	\$3,343	\$3,619	\$2,196	\$4,835	-\$257	\$0	\$5	\$1,732	\$9,013	\$117	\$34,123
Large Commercial Retrofit	\$239,679	\$79,656	\$3,028	\$5,990	\$6,722	\$6,660	\$75	\$7,191	\$5,177	\$4,940	\$3,098	\$10,800	-\$1,992	\$0	\$36	\$11,261	\$16,590	\$79	\$160,023
Small Business Direct Install	\$27,950	\$13,059	\$261	\$617	\$597	\$592	\$8	\$1,435	\$839	\$1,062	\$555	\$2,158	-\$404	\$0	\$0	\$1,971	\$3,352	\$16	\$14,890
C&I SUBTOTAL	\$340,875	\$131,838	\$4,823	\$7,917	\$10,319	\$10,224	\$99	\$14,315	\$9,359	\$9,621	\$5,850	\$17,793	-\$2,653	\$0	\$41	\$14,965	\$28,955	\$212	\$209,036
TOTAL	\$487,836	\$222,759	\$6,134	\$9,800	\$12,943	\$12,824	\$124	\$21,155	\$17,333	\$11,446	\$7,508	\$24,184	-\$2,506	\$17,547	\$2,089	\$33,782	\$47,124	\$1,272	\$265,077

Table E-6A - PROVISIONAL PLAN - Refined 1-7-2022
National Grid
Summary of 2022 Impacts by Program (Energy Efficiency Measures)

	Load Reduction in kW		Electric Energy Savings				Gas Saved		Oil Saved		Propane Saved		Total Net Savings (Electric, Gas, Oil, Propane)	
			MWh		MMBtu		MMBtu		MMBtu		MMBtu		MMBtu	
	Summer	Winter	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime
Non-Income Eligible Residential														
Residential New Construction	74	259	867	14,947	2,957	50,998	-	-	521	13,016	1,321	33,013	4,798	97,027
ENERGY STAR® HVAC	240	1,063	4,620	77,717	15,762	265,169	395	6,012	4,463	67,405	(33)	(424)	20,587	338,161
EnergyWise	424	506	2,789	13,472	9,515	45,968	-	-	19,019	364,568	230	3,654	28,764	414,190
EnergyWise Multifamily	143	350	1,424	20,783	4,857	70,912	-	-	1,046	25,343	-	-	5,903	96,255
Home Energy Reports	3,692	5,706	26,852	26,852	91,619	91,619	-	-	-	-	-	-	91,619	91,619
Residential Consumer Products	1,118	826	6,885	47,554	23,491	162,256	84	1,672	85	1,683	25	370	23,685	165,981
Non-Income Eligible Residential SUBTOTAL	5,691	8,709	43,435	201,325	148,201	686,921	478	7,684	25,133	472,014	1,543	36,614	175,356	1,203,233
Income Eligible Residential														
Single Family - Income Eligible Services	480	501	3,314	38,506	11,306	131,383	958	11,562	11,178	214,399	63	1,121	23,505	358,466
Income Eligible Multifamily	49	445	1,538	24,309	5,247	82,943	-	-	1,239	25,915	-	-	6,486	108,858
Income Eligible Residential SUBTOTAL	529	946	4,851	62,816	16,553	214,327	958	11,562	12,417	240,314	63	1,121	29,991	467,324
Commercial & Industrial														
Large Commercial New Construction	1,980	1,477	14,258	219,673	48,647	749,523	(2,368)	(30,783)	-	-	-	-	46,279	718,740
Large Commercial Retrofit	9,190	7,845	44,679	342,728	152,445	1,169,389	(36,585)	(239,826)	-	-	-	-	115,860	929,563
Small Business Direct Install	933	730	10,231	66,932	34,908	228,373	(8,102)	(48,613)	-	-	-	-	26,806	179,760
C&I SUBTOTAL	12,103	10,051	69,168	629,333	236,000	2,147,285	(47,055)	(319,222)	-	-	-	-	188,945	1,828,063
TOTAL	18,323	19,706	117,454	893,474	400,754	3,048,533	(45,619)	(299,976)	37,550	712,329	1,607	37,735	394,292	3,498,621

Notes:
1) Lifetime savings are equal to annual savings multiplied by the expected life of measures expected to be installed in each program.

Table E-6B - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Summary of 2022 Demand Response Benefits and Savings

	Benefits (000's)															Load Reduction (MW)	MWh Saved		
	Total	Total (Economic Excluded)	Summer Generation	Capacity				Energy					Non Electric Resource	Societal			Summer	Annual	Lifetime
				DRIVE	Trans	Dist	Reliability	Winter		Summer		Energy DRIPE		Carbon	Economic				
								Peak	Off Peak	Peak	Off Peak								
Non-Income Eligible Residential																			
Residential Connected	\$4,389	\$2,884	\$238	\$976	\$729	\$722	\$214	\$0	\$0	\$0	\$0	\$0	\$0	\$3	\$1,504		7.4	59.4	59.4
Commercial & Industrial																			
Commercial Connected	\$20,228	\$10,621	\$646	\$2,651	\$3,207	\$3,177	\$941	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$9,607		32.4	0.0	0.0
TOTAL	\$24,617	\$13,505	\$884	\$3,627	\$3,936	\$3,899	\$1,154	\$0	\$0	\$0	\$0	\$0	\$0	\$3	\$11,110		39.8	59.4	59.4

Table E-7 - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
Comparison of 2022 and 2021 Goals and Tracking

	Proposed 2022 Goal		Proposed 2022 Tracking				Approved 2021				Difference			
	Lifetime Electric Energy Savings (MWh)	Active Demand Response (kW)	Annual Electric Energy Savings (MWh)	Annual Passive Summer Demand Savings (kW)	Total Net Lifetime Energy Savings (MMBtu)	Planned Unique Participants	Lifetime Electric Energy Savings (MWh)	Annual Electric Energy Savings (MWh)	Annual Passive Summer Demand Savings (kW)	Active Demand Response (kW)	Lifetime Electric Energy Savings (MWh)	Annual Electric Energy Savings (MWh)	Annual Passive Summer Demand Savings (kW)	Active Demand Response (kW)
Non-Income Eligible Residential														
Residential New Construction	14,947		867	74	97,027	462	18,088	979	66		-3,141	-113	8	
ENERGY STAR® HVAC	77,717		4,620	240	338,161	5,229	51,309	3,181	204		26,408	1,439	36	
EnergyWise	13,472		2,789	424	414,190	12,000	14,385	2,841	445		-913	-52	-20	
EnergyWise Multifamily	20,783		1,424	143	96,255	3,600	16,307	1,240	158		4,476	183	-15	
Home Energy Reports	26,852		26,852	3,692	91,619	323,248	26,852	26,852	3,692		0	0	0	
ENERGY STAR® Lighting	0		0	0	0	0	26,801	11,533	1,872		-26,801	-11,533	-1,872	
Residential Consumer Products	47,554		6,885	1,118	165,981	34,692	38,130	5,926	1,019		9,424	958	100	
Residential ConnectedSolutions		7,365				4,178				5,431		0		1,934
Non-Income Eligible Residential SUBTOTAL	201,325	7,365	43,435	5,691	1,203,233	383,409	191,872	52,553	7,455	5,431	9,453	-9,118	-1,764	1,934
Income Eligible Residential														
Single Family - Income Eligible Services	38,506		3,314	480	358,466	3,583	36,909	3,120	457		1,598	194	22	
Income Eligible Multifamily	24,309		1,538	49	108,858	3,600	22,545	1,554	70		1,764	-16	-21	
Income Eligible Residential SUBTOTAL	62,816		4,851	529	467,324	7,183	59,454	4,674	527		3,361	177	2	
Commercial & Industrial														
Large Commercial New Construction	219,673		14,258	1,980	718,740	96	189,441	11,837	1,856		30,232	2,421	124	
Large Commercial Retrofit	342,728		44,679	9,190	929,563	2,239	744,562	59,496	11,648		-401,833	-14,817	-2,458	
Small Business Direct Install	66,932		10,231	933	179,760	490	105,134	9,696	1,134		-38,201	535	-202	
Commercial ConnectedSolutions		32,400				180				33,600				-1,200
C&I SUBTOTAL	629,333	32,400	69,168	12,103	1,828,063	3,005	1,039,136	81,029	14,638	33,600	-409,803	-11,861	-2,535	-1,200
TOTAL	893,474	39,765	117,454	18,323	3,498,621	393,597	1,290,462	138,256	22,621	39,031	-396,988	-20,802	-4,298	734

Notes:
(1) Planned 2022 participation takes into account net-to-gross and estimates unique participation by taking into account 2021 unique customer accounts to savings ratios. Therefore the number of planned measures may be more than the estimated participants shown. For measure counts please view the widget tables in Attachments 1 and 2. Table E-7 no longer includes a comparison to the previous year's participation. Due to the way unique participation is calculated it is not possible to compare year-over-year results.
(2) There are additional Low Income participants in Residential New Construction.
(3) A customer can participate in more than one program, for example, Residential Consumer Products and and Home Energy Reports, therefore the population reached can be more than 100%.

Table E-8A - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
2022 Electric PIM Benefits, Allocations, and Categorization (\$000)

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
	Capacity					Energy					Utility NEIs	Non Electric			Societal			
	Summer Generation	Capacity DRIPE	Transmission	Distribution	Reliability	Winter Peak Energy	Winter Off Peak Energy	Summer Peak Energy	Summer Off Peak Energy	Electric Energy DRIPE	Utility NEIs	Natural Gas and DRIPE	Oil and Oil DRIPE	Propane and Water	Non Resource	Carbon	NOx	Economic
Non-Income Eligible Residential																		
Residential New Construction	\$48	\$43	\$94	\$93	\$1	\$369	\$485	\$144	\$110	\$289	\$0	\$0	\$325	\$1,304	\$66	\$833	\$28	\$2,340
ENERGY STAR® HVAC	\$182	\$159	\$357	\$353	\$2	\$2,398	\$2,987	\$221	\$185	\$1,833	\$0	\$55	\$1,639	-\$16	\$384	\$3,762	\$131	\$7,683
EnergyWise	\$148	\$162	\$291	\$288	\$2	\$267	\$273	\$178	\$157	\$314	\$0	\$0	\$8,984	\$233	\$1,267	\$3,605	\$458	\$16,447
EnergyWise Multifamily	\$94	\$79	\$182	\$180	\$1	\$595	\$742	\$106	\$89	\$464	\$0	\$0	\$632	\$48	\$1,931	\$1,004	\$43	\$4,693
Home Energy Reports	\$207	\$450	\$365	\$362	\$6	\$646	\$531	\$251	\$183	\$640	\$0	\$0	\$0	\$0	\$0	\$1,736	\$23	\$2,932
Residential Consumer Products	\$335	\$719	\$752	\$745	\$9	\$903	\$981	\$485	\$487	\$1,496	\$0	\$15	\$42	\$41	\$4	\$2,663	\$37	\$4,613
Income Eligible Residential SUBTOTAL	\$1,014	\$1,612	\$2,041	\$2,022	\$21	\$5,178	\$5,999	\$1,385	\$1,210	\$5,036	\$0	\$70	\$11,622	\$1,609	\$3,652	\$13,603	\$720	\$38,708
Income Eligible Residential																		
Single Family - Income Eligible Services	\$275	\$253	\$541	\$536	\$3	\$874	\$967	\$410	\$423	\$801	\$273	\$77	\$5,282	\$386	\$10,935	\$3,428	\$295	\$12,736
Income Eligible Multifamily	\$22	\$19	\$43	\$43	\$0	\$789	\$1,008	\$30	\$25	\$554	\$341	\$0	\$642	\$53	\$3,617	\$1,137	\$45	\$4,597
Income Eligible Residential SUBTOTAL	\$297	\$271	\$584	\$578	\$3	\$1,663	\$1,975	\$440	\$448	\$1,354	\$614	\$77	\$5,924	\$439	\$14,552	\$4,565	\$340	\$17,333
Commercial & Industrial																		
Large Commercial New Construction	\$1,534	\$1,310	\$2,999	\$2,972	\$16	\$5,688	\$3,343	\$3,619	\$2,196	\$4,835	\$0	-\$257	\$0	\$5	\$1,732	\$9,013	\$117	\$34,123
Large Commercial Retrofit	\$3,028	\$5,990	\$6,722	\$6,660	\$75	\$7,191	\$5,177	\$4,940	\$3,098	\$10,800	\$0	-\$1,992	\$0	\$36	\$11,261	\$16,590	\$79	\$160,023
Small Business Direct Install	\$261	\$617	\$597	\$592	\$8	\$1,435	\$839	\$1,062	\$855	\$2,158	\$0	-\$404	\$0	\$0	\$1,971	\$3,352	\$16	\$14,890
C&I SUBTOTAL	\$4,823	\$7,917	\$10,319	\$10,224	\$99	\$14,315	\$9,359	\$9,621	\$5,850	\$17,793	\$0	-\$2,653	\$0	\$41	\$14,965	\$28,955	\$212	\$209,036
Included in PIM? (Y/N)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	N
Percent Application in PIM	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	50%	50%	50%	0%	0%	0%	0%
Category	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Resource Benefits	Resource Benefits	Resource Benefits	NA	NA	NA	NA

Notes
From 2022 Benefit-Cost Model, reflects benefits in Table E-6

Table E-8B - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
2022 Electric PIM Costs

	(1)	(2)	(3)
	Costs (\$)		
	Eligible Spending Budget from Table E-3	Regulatory Costs	Total Costs for PIM Calculations
Non-Income Eligible Residential SUBTOTAL	\$31,178,208	\$2,728,639	\$33,906,847
Income Eligible Residential SUBTOTAL	\$16,802,684	\$2,728,639	\$19,531,323
C&I SUBTOTAL	\$54,704,670	\$2,728,639	\$57,433,309
Included in PIM? (Y/N)	Y	Y	Y

Notes

Source is Table E-2 and E-3. Regulatory costs allocated equally to each sector.

Table E-8C - PROVISIONAL PLAN - Refiled 1-7-2022
National Grid
2022 Electric PIM and SQA

Sector PI = min(Payout Cap(i), [Actual Net Benefits * Design Payout Rate(g) * Payout Rate Adjustment(i)])

Sector	Planned Eligible Benefits		Planned Eligible Costs	Planned Eligible Net Benefits (4)	Design Performance Achievement	Design Performance Payout	Design Payout Rate	Design Payout Rate Thresholds	Payout Rate Adjustments	Payout Cap	Service Quality Metric
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
	100% Electric Utility System Benefits	50% Resource Benefits	Eligible Spending Budget + Regulatory Costs	=(a)-(b)-(c)	Net benefits at which design incentive pool is achieved	Set by PUC	=(f)/(e)	Achievement levels at which the Payout Rate Adjustments in (i) will be applied—Set by PUC	Factor to adjust Design Payout Rate for if final program achievement fall within the ranges in (h)—Set by PUC	=1.25*(j)	Yes if (d) ≤ 0; No if (d) > 0
										Cap on sector payout regardless of achievement in sector	See Service Quality Table
Non-income Eligible Residential	\$25,517,341	\$6,650,701	\$33,906,847	-\$1,738,805	\$2,000,000	\$500,000	25%	a. Achievement < 25% b. 25% ≤ Achievement < 50% c. 50% ≤ Achievement < 75% d. 75% ≤ Achievement e. Spending > Planned Eligible Costs	a. B.0 b. Achievement/100 + 0.1 c. Achievement/100 + 0.25 d. B.0 e. See Boundary Rules	\$625,000	Yes
Income Eligible Residential	\$8,228,275	\$3,220,366	\$19,531,323	-\$8,082,681	\$2,000,000	\$500,000	25%			\$625,000	Yes
Commercial & Industrial	\$90,318,740	-\$1,305,881	\$57,433,309	\$31,579,550	\$31,579,550	\$5,500,000	17%			\$6,875,000	No

Sector SQA = Maximum Service Adjustment(e) * Service Achievement Scaling Factor(g)

	Planned Eligible Benefits		Planned Eligible Costs	Design Service Achievement	Maximum Service Adjustment	Service Adjustment Thresholds	Service Achievement Scaling Factors	Achievement Cost Adjustment
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
	100% Electric Utility System Benefits	50% Resource Benefits	Eligible Spending Budget + Regulatory Costs	=(a)-(b)	Maximum downward adjustment to earned incentive—Set by PUC	Adjusted Achievement levels at which the Service Adjustments in (e) will be applied; adjustment is calculated in (h)	Factor to scale program achievement that fall within the ranges in (f)	Actual-cost-based adjustment factor applied to achievement. Result is if the difference between achievement and cost variances are greater than 5%, the Actual Achievement will be adjusted for use in
Non-income Eligible Residential	\$25,517,341	\$6,650,701	\$33,906,847	\$32,168,042	\$1,251,250	a. Adjusted Achievement < 65% b. 65% ≤ Adjusted Achievement < 95% c. 95% ≤ Adjusted Achievement	a. B b. (95-Adjusted Achievement)/30 c. B	Performance Variance = "Actual Benefits" / "Design Achievement" - "Spending" / "Planned Eligible Cost" If the absolute value (Performance Variance) ≤ 0.05, Then Adjusted Achievement = Actual Achievement Else Adjusted Achievement = Actual Achievement * (1 + Performance Variance)
Income Eligible Residential	\$8,228,275	\$3,220,366	\$19,531,323	\$11,448,641	\$715,000			
Commercial & Industrial	\$90,318,740	-\$1,305,881	\$57,433,309	N/A	N/A			

Table E-9 - PROVISIONAL PLAN - Refined 1-7-2022
National Grid
Revolving Loan Fund Projections

Large C&I Revolving Loan Fund		Small Business Revolving Loan Fund	
(1) Total Loan Fund Deposits Through 2021	\$ 18,547,780	(1) Total Loan Fund Deposits Through 2021	\$ 3,303,570
(2) Current Loan Fund Balance	\$ 7,208,593	(2) Current Loan Fund Balance	\$ 2,743,078
<i>Loans Paid Year-To-Date</i>	\$ 3,356,693	<i>Loans Paid Year-To-Date</i>	\$ 570,365
<i>Repayments Year-To-Date</i>	\$ 2,946,562	<i>Repayments Year-To-Date</i>	\$ 606,588
(3) Projected Additional Loans by Year End 2021	\$ 5,770,777	(3) Projected Additional Loans by Year End 2021	\$ 510,000
(4) Projected Additional Repayments by Year End 2021	\$ 2,453,636	(4) Projected Additional Repayments by Year End 2021	\$ 275,529
(5) Projected Year End Loan Fund Balance 2021	\$ 3,891,451	(5) Projected Year End Loan Fund Balance 2021	\$ 2,508,608
(6) 2022 Fund Injection	\$ 2,000,000	(6) 2022 Fund Injection	\$ -
(7) Projected Loan Fund Balance, January 2022	\$ 5,891,451	(7) Projected Loan Fund Balance, January 2022	\$ 2,508,608
(8) Projected Repayments throughout 2022	\$ 3,881,906	(8) Projected Repayments throughout 2022	\$ 245,746
(9) Estimated Loans in 2022	\$ 8,928,261	(9) Estimated Loans in 2022	\$ 1,500,000
(10) Projected Year End Loan Fund Balance 2022	\$ 845,095	(10) Projected Year End Loan Fund Balance 2022	\$ 1,254,353
Public Sector Revolving Loan Fund		Efficient Buildings Fund	
(1) Total Loan Fund Deposits Through 2021	\$ 54,065	(1) Energy Efficiency Funds allocated to EBF through 2021	\$ 27,087,113
(2) Current Loan Fund Balance	\$ 34,124	(2) Total EBF Loans Outstanding	\$ 55,075,045
<i>Funds returned to OER</i>	\$ -		
<i>Repayments Year-To-Date</i>	\$ 34,052		
(3) Projected Additional Loans by Year End	\$ -		
(4) Projected Additional Repayments by Year End	\$ 15,523		
(5) Projected Year End Loan Fund Balance 2021	\$ 49,647		
(6) 2022 Fund Injection	\$ -		
(7) Projected Loan Fund Balance, January 2022	\$ 49,647		
(8) Projected Repayments throughout 2022	\$ 2,945		
(9) Estimated Loans in 2022	\$ -		
(10) Projected Year End Loan Fund Balance 2022	\$ 52,592		

Notes

- 1 Funding injections since loan funds began. Net of any adjustments.
- 2 Current Loan Fund Balance is through July 2021; it includes all loans and repayments made by July 2021. Public Sector Revolving Loan Fund reduced by transfers to RI PEP Incentives. EBF reports in terms of loans outstanding.
- 3 Projected Loans from July to Year-End 2021 is estimated based on projects currently under construction that are anticipated to be paid out by year-end. It is difficult to project this amount accurately due to the fact that projects could be delayed by a month or two resulting in payment occurring in 2022 instead of 2021.
- 4 Projected Repayments from June to Year-End 2021 is estimated based on the monthly average amount of repayments.
- 5 Equal to (2) - (3) + (4).
- 6 Fund injection of \$2M for the Large C&I Revolving Loan Fund is included under the Finance Cost line in table E-2.
- 7 Equal to (5) + (6).
- 8 Assumption based on monthly average repayments in 2021 over 12 month period; repayments accumulate over time and may vary widely.
- 9 Amount projected to be lent to customers in 2022
- 10 Equal to (7) + (8) - (9).
- 11 Efficient Buildings Fund - The 2022 Annual Plan only includes two values for EBF: 1) The Energy Efficiency Funds allocated to EBF through 2021. This assumes that the \$5M allocated to EBF for 2021 will be transferred to RIIB in 2021. 2) Total EBF Loans Outstanding as of July 2021. Additional information is not available because RIIB has informed the Company that, commencing with the 2022 Plan, it will not be providing forward looking projections to the Company regarding EBF. The Company is therefore unable to provide any future projections in the 2022 Annual Plan regarding EBF. The state's System Reliability and Least Cost procurement statute (amended in 2021) directs that \$5M shall be transferred to RIIB. However, RIIB has not informed the Company the statutory \$5M transfer to RIIB in 2022 will go to EBF.

Table E-10 - PROVISIONAL PLAN - Refined 1-7-2022
National Grid
Rhode Island Electric Energy Efficiency 2003 - 2022
\$(000)

Electric	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013⁽⁴⁾	2014	2015	2016	2017	2018	2019	2020⁽⁵⁾	2021⁽⁶⁾	2022⁽⁵⁾
Energy Efficiency Budget (\$Million) ⁽¹⁾	\$23.1	\$22.6	\$23.1	\$22.4	\$22.5	\$21.0	\$32.4	\$37.6	\$59.2	\$61.4	\$77.5	\$87.0	\$86.6	\$87.5	\$94.6	\$94.6	\$107.5	\$111.1	\$116.8	\$122.6
Spending Budget (\$Million) ⁽²⁾	\$16.3	\$15.8	\$17.6	\$16.5	\$16.4	\$14.7	\$23.5	\$28.8	\$45.3	\$55.3	\$64.8	\$80.6	\$77.3	\$77.6	\$88.5	\$88.7	\$98.1	\$101.1	\$104.8	\$102.7
Actual Expenditures (\$Million) ⁽³⁾	\$22.8	\$19.5	\$23.4	\$23.7	\$21.9	\$19.2	\$31.7	\$29.7	\$40.0	\$50.7	\$72.9	\$85.3	\$87.4	\$78.4	\$94.8	\$93.0	\$100.7	\$88.2		
Incentive Percentage ⁽¹⁰⁾	4.4%	4.4%	4.4%	4.4%	4.4%	4.4%	4.4%	4.4%	4.4%	4.4%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	N/A	N/A
Target Incentive ⁽¹¹⁾	\$712,557	\$781,959	\$774,689	\$726,627	\$723,000	\$647,689	\$1,035,943	\$1,267,043	\$1,992,513	\$2,434,131	\$3,240,747	\$4,032,000	\$3,867,400	\$3,878,087	\$4,425,528	\$4,436,022	\$4,905,009	\$5,054,448	\$5,500,000	\$5,500,000
Earned Incentive	\$712,557	\$604,876	\$795,648	\$760,623	\$716,075	\$675,282	\$1,085,888	\$1,333,996	\$1,929,273	\$2,469,411	\$2,997,681	\$4,223,321	\$4,533,360	\$4,128,034	\$4,829,847	\$4,940,402	\$3,290,237	\$3,242,675		
Annual Summer Demand kW Savings Goal Achieved (%)				106%	106%	113%	142%	78%	71%	83%	114%	78%	112%	101%	103%	116%	98%	79%		
Annual MWh Energy Savings Goal Achieved (%)				111%	102%	111%	115%	107%	94%	93%	99%	105%	115%	107%	115%	110%	98%	88%		
Energy Efficiency Program Charge (\$/kWh) ⁽⁷⁾	\$0.00200	\$0.00200	\$0.00200	\$0.00200	\$0.00200	\$0.00200	\$0.00320	\$0.00320	\$0.00526	\$0.00592	\$0.00876	\$0.00911	\$0.00953	\$0.01077	\$0.01124	\$0.00972	\$0.01121	\$0.01323	\$0.01113	\$0.01406
Annual Cost to 500 kWh/month Residential Customer w/o tax ⁽⁸⁾	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$19.20	\$19.20	\$31.56	\$35.52	\$52.56	\$54.66	\$57.18	\$64.62	\$67.44	\$58.32	\$67.26	\$79.38	\$66.78	\$84.36
Annual Cost to 500 kWh/month Residential Customer w/ tax ⁽⁹⁾	\$12.50	\$12.50	\$12.50	\$12.50	\$12.50	\$12.50	\$20.00	\$20.00	\$32.88	\$37.00	\$54.75	\$56.94	\$59.56	\$67.31	\$70.25	\$60.75	\$70.06	\$82.69	\$69.56	\$87.88

Notes:

- (1) Energy Efficiency Budget includes total expenditures and commitments. Includes all demand side management program-related expenses, including rebates, administration and general expenses, evaluation, commitments for future years and Company incentive.
- (2) Prior to 2017, Spending Budget Eligible for Shareholder Incentive includes: Implementation, Administration, General, and Evaluation Expenses; excludes EERMC and OER Costs, Commitments, Copays, and Outside Finance Costs. Beginning in 2017, Outside Finance Costs were also included. Beginning in 2018 Pilot expenses were also excluded. Beginning in 2019 ConnectedSolutions expenses and assessments were also excluded.
- (3) Actual Expenditures is actual spend during calendar year. Includes expenditures and commitments. Includes all demand side management program-related expenses, including rebates, administration and general expenses, evaluation, commitments for future years and Company incentive.
- (4) In the Company's gas and electric rate cases in docket 4323, the PUC approved the uncollectibles gross-up in the electric EE Program Charge effective February 1, 2013, and a new rate applicable to the gross-up of the gas EE Program Charge, effective February 1, 2013.
- (5) 2021 values are planned.
- (6) 2022 values are proposed.
- (7) Beginning in 2012, the EE Program Charge includes the System Reliability Factor. It does not include the \$0.0003 renewables per RI General Laws §39-2-1.2 and Order #19608, which appears on customer bills.
- (8) Reflects the annual cost excluding Gross Earnings Tax.
- (9) Reflects the annual cost including Gross Earnings Tax.
- (10) Incentive percentage not applicable for 2021 due to new performance incentive mechanism developed for the 2021 Annual Plan. See Section 11 of the Main Text of the 2022 Annual Plan for additional details.
- (11) Target incentive is calculated in the same way as in 2021 in order to provide a more accurate estimate of the energy efficiency surcharge.

Table E-2 - PUC 1-20 Refiled
National Grid
2022 Electric Energy Efficiency Program Budget (\$000)

	Program Planning & Administration	Marketing	Cost of services and product rebates/incentives provided to customers	Sales, Technical Assistance & Training	Evaluation & Market Research	Total Performance Incentive	Grand Total
Non-Income Eligible Residential							
Residential New Construction	\$0.1	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1
ENERGY STAR@ HVAC	\$0.4	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.5
EnergyWise	\$2.0	\$0.0	\$0.0	\$0.1	\$0.0	\$0.0	\$2.2
EnergyWise Multifamily	\$0.4	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.4
Residential Consumer Products	\$0.3	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.3
Home Energy Reports	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Residential ConnectedSolutions	\$0.2	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.2
Energy Efficiency Education Programs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Residential Pilots	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Community Based Initiatives - Residential	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Comprehensive Marketing - Residential	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Residential Performance Incentive	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Subtotal - Non-Income Eligible Residential	\$3.4	\$0.0	\$0.0	\$0.26	\$0.0	\$0.0	\$3.7
Income Eligible Residential							
Single Family - Income Eligible Services	\$1.7	\$0.0	\$0.0	\$0.1	\$0.0	\$0.0	\$1.8
Income Eligible Multifamily	\$0.5	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.5
Income Eligible Performance Incentive	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Subtotal - Income Eligible Residential	\$2.1	\$0.0	\$0.0	\$0.16	\$0.0	\$0.0	\$2.3
Commercial & Industrial							
Large Commercial New Construction	(\$64.9)	\$0.0	\$2,890.5	\$382.1	\$0.0	\$0.0	\$3,207.7
Large Commercial Retrofit	\$49.5	\$0.0	\$4,335.9	\$791.0	\$0.0	\$0.0	\$5,176.4
Small Business Direct Install	\$9.3	\$0.0	\$751.4	\$2.7	\$0.0	\$0.0	\$763.4
Commercial ConnectedSolutions	\$0.6	\$0.0	\$0.0	\$0.3	\$0.0	\$0.0	\$0.9
Commercial Pilots	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Community Based Initiatives - C&I	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Finance Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Commercial Workforce Development	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Commercial & Industrial Performance Incentive	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Subtotal - Commercial & Industrial	(\$5.6)	\$0.0	\$7,977.9	\$1,176.1	\$0.0	\$0.0	\$9,148.4
Regulatory							
OER	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
EERMC	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Rhode Island Infrastructure Bank	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Subtotal - Regulatory	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Grand Total	\$0.0	\$0.0	\$7,977.9	\$1,176.5	\$0.0	\$0.0	\$9,154.4

Notes:

- (1) 2022 Large Commercial Retrofit Commitments (\$000);
- (2) For more information on Finance Costs, please refer to Attachment 2, Section 9.
- (3) OER and EERMC total 3.0% of customers' EE Program Charge collected on Table E-1, minus 3%.
- (4) Finance Costs are detailed in Table E-9. Finance Costs include an injection of \$2M into the Large C&I Revolving Loan Fund. Without this injection the Large C&I Revolving Loan Fund is projected to be negative by the end of 2022.
- (5) Demonstrations and Assessments budgets are included in specific program level budgets listed above. More information on Demonstration and Assessments descriptions, budgets, and which program level budget they are included in can be found in Attachment 8.
- (6) Based on the state's System Reliability and Least Cost procurement statute (amended in 2021), funds transferred to the Rhode Island Infrastructure Bank are now classified under Regulatory costs.

**Table E-5 - PUC 1-20 Refiled
National Grid
Calculation of 2022 Program Year Cost-Effectiveness
All Dollar Values in (\$000)**

	RI Test Benefit/ Cost¹	Total Benefit	Program Implementation Expenses²	Customer Contribution	Performance Incentive	¢/Lifetime kWh
Non-Income Eligible Residential						
Residential New Construction	0.00	\$0.0	\$0.1	\$0.0		
ENERGY STAR® HVAC	0.00	\$0.0	\$0.5	\$0.0		
EnergyWise	0.00	\$0.0	\$2.2	\$0.0		
EnergyWise Multifamily	0.00	\$0.0	\$0.4	\$0.0		
Home Energy Reports	0.00	\$0.0	\$0.0	\$0.0		
Residential Consumer Products	0.00	\$0.0	\$0.3	\$0.0		
Residential ConnectedSolutions	0.00	\$0.0	\$0.2	\$0.0		
Energy Efficiency Education Programs			\$0.0			
Residential Pilots			\$0.0			
Community Based Initiatives - Residential			\$0.0			
Comprehensive Marketing - Residential			\$0.0			
Non-Income Eligible Residential SUBTOTAL	0.00	\$0.0	\$3.7	\$0.0	\$0.0	
Income Eligible Residential						
Single Family - Income Eligible Services	0.00	\$0.0	\$1.8	\$0.0		
Income Eligible Multifamily	0.00	\$0.0	\$0.5	\$0.0		
Income Eligible Residential SUBTOTAL	0.00	\$0.0	\$2.3	\$0.0	\$0.0	
Commercial & Industrial						
Large Commercial New Construction	3.53	\$4,873.8	\$3,207.7	-\$1,827.9	\$0.0	
Large Commercial Retrofit	2.02	\$6,744.9	\$5,176.4	-\$1,833.0	\$0.0	
Small Business Direct Install	0.73	\$463.0	\$763.4	-\$130.7	\$0.0	
Commercial ConnectedSolutions	0.00	\$0.0	\$0.9	\$0.0	\$0.0	
Commercial Pilots			\$0.0			
Community Based Initiatives - C&I			\$0.0			
Finance Costs			\$0.0			
Commercial Workforce Development			\$0.0			
C&I SUBTOTAL	2.26	\$12,081.7	\$9,148.4	-\$3,791.5	\$0.0	
Regulatory						
OER			0.0			
EERMC			0.0			
Rhode Island Infrastructure Bank			0.0			
Regulatory SUBTOTAL			\$0.0			
TOTAL	2.25	\$12,081.7	\$9,154.4	-\$3,791.5	\$0.0	

Notes:

- (1) RI Test B/C Test = Total Benefits from Table E-6A / Program Implementation Expenses from Table E-3
Also includes effects of free-ridership and spillover.
- (2) For Implementation Expenses derivation, see Table E-3.

**Table E-5 - Secondary - PUC 1-20 Refiled
National Grid
Calculation of 2022 Program Year Cost-Effectiveness with Economic Benefits Included
All Dollar Values in (\$000)**

	RI Test Benefit/ Cost¹	Total Benefit	Program Implementation Expenses²	Customer Contribution	Performance Incentive	¢/Lifetime kWh
Non-Income Eligible Residential						
Residential New Construction	1.40	\$0.2	\$0.1	\$0.0		
ENERGY STAR® HVAC	1.42	\$0.7	\$0.5	\$0.0		
EnergyWise	0.93	\$2.0	\$2.2	\$0.0		
EnergyWise Multifamily	1.34	\$0.6	\$0.4	\$0.0		
Home Energy Reports	0.00	\$0.0	\$0.0	\$0.0		
Residential Consumer Products	1.52	\$0.4	\$0.3	\$0.0		
Residential ConnectedSolutions	0.83	\$0.2	\$0.2	\$0.0		
Energy Efficiency Education Programs			\$0.0			
Residential Pilots			\$0.0			
Community Based Initiatives - Residential			\$0.0			
Comprehensive Marketing - Residential			\$0.0			
Non-Income Eligible Residential SUBTOTAL	1.10	\$4.1	\$3.7	\$0.0	\$0.0	
Income Eligible Residential						
Single Family - Income Eligible Services	0.86	\$1.5	\$1.8	\$0.0		
Income Eligible Multifamily	1.19	\$0.6	\$0.5	\$0.0		
Income Eligible Residential SUBTOTAL	0.93	\$2.1	\$2.3	\$0.0	\$0.0	
Commercial & Industrial						
Large Commercial New Construction	10.05	\$13,863.4	\$3,207.7	-\$1,827.9		
Large Commercial Retrofit	11.00	\$36,767.9	\$5,176.4	-\$1,833.0		
Small Business Direct Install	3.11	\$1,967.0	\$763.4	-\$130.7		
Commercial ConnectedSolutions	2.19	\$2.0	\$0.9	\$0.0		
Commercial Pilots			\$0.0			
Community Based Initiatives - C&I			\$0.0			
Finance Costs			\$0.0			
Commercial Workforce Development			\$0.0			
C&I SUBTOTAL	9.82	\$52,600.2	\$9,148.4	-\$3,791.5	\$0.0	
Regulatory						
OER			0.0			
EERMC			0.0			
Rhode Island Infrastructure Bank			0.0			
Regulatory SUBTOTAL			\$0.0			
TOTAL	9.81	\$52,606.4	\$9,154.4	-\$3,791.5	\$0.0	

Notes:

- (1) RI Test B/C Test = Total Benefits from Table E-6A / Program Implementation Expenses from Table E-3
Also includes effects of free-ridership and spillover.
- (2) For Implementation Expenses derivation, see Table E-3.

Table E-5A - PUC 1-20 Refiled
National Grid
Calculation of 2022 Program Year Cost-Effectiveness with TRC Test
All Dollar Values in (\$000)

	TRC Benefit/ Cost¹	Total Benefit	Program Implementation Expenses²	Customer Contribution	Performance Incentive	¢/Lifetime kWh
Non-Income Eligible Residential						
Residential New Construction	0.00	\$0.0	\$0.1	\$0.0		
ENERGY STAR® HVAC	0.00	\$0.0	\$0.5	\$0.0		
EnergyWise	0.00	\$0.0	\$2.2	\$0.0		
EnergyWise Multifamily	0.00	\$0.0	\$0.4	\$0.0		
Home Energy Reports	0.00	\$0.0	\$0.0	\$0.0		
Residential Consumer Products	0.00	\$0.0	\$0.3	\$0.0		
Residential ConnectedSolutions	0.00	\$0.0	\$0.2	\$0.0		
Energy Efficiency Education Programs			\$0.0			
Residential Pilots			\$0.0			
Community Based Initiatives - Residential			\$0.0			
Comprehensive Marketing - Residential			\$0.0			
Non-Income Eligible Residential SUBTOTAL	0.00	\$0.0	\$3.7	\$0.0	\$0.0	
Income Eligible Residential						
Single Family - Income Eligible Services	0.00	\$0.0	\$1.8	\$0.0		
Income Eligible Multifamily	0.00	\$0.0	\$0.5	\$0.0		
Income Eligible Residential SUBTOTAL	0.00	\$0.0	\$2.3	\$0.0	\$0.0	
Commercial & Industrial						
Large Commercial New Construction	2.71	\$3,741.1	\$3,207.7	-\$1,827.9		
Large Commercial Retrofit	1.58	\$5,276.3	\$5,176.4	-\$1,833.0		
Small Business Direct Install	0.53	\$335.7	\$763.4	-\$130.7		
Commercial ConnectedSolutions	0.00	\$0.0	\$0.9	\$0.0		
Commercial Pilots			\$0.0			
Community Based Initiatives - C&I			\$0.0			
Finance Costs			\$0.0			
Commercial Workforce Development			\$0.0			
C&I SUBTOTAL	1.75	\$9,353.0	\$9,148.4	-\$3,791.5	\$0.0	
Regulatory						
OER			\$0.0			
EERMC			\$0.0			
Rhode Island Infrastructure Bank			\$0.0			
Regulatory SUBTOTAL			\$0.0			
TOTAL	1.74	\$9,353.0	\$9,154.4	-\$3,791.5	\$0.0	

(1) TRC B/C Test omits societal benefits that are monetized in the RI Test, including non-embedded emissions (CO2 and Nox), and economic benefits. Also includes effects of free-ridership and spillover.

(2) For Implementation Expenses derivation, see Table E-3.

Table E-6 - PUC 1-20 Refiled
National Grid
Summary of 2022 Benefits by Program (Energy Efficiency Measures)

	Benefits (000's)																			
	Total	Total (Economic Excluded)	Capacity					Energy				Non Electric				Societal				
			Summer Generation	Capacity DRIPE	Trans	Dist	Reliability	Winter		Summer		Electric Energy DRIPE	Natural Gas	Oil	Other Resource	Non Resource	Carbon	NOx	Economic	
Winter Peak	Winter Off Peak	Summer Peak	Summer Off Peak																	
Non-Income Eligible Residential																				
Residential New Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
ENERGY STAR® HVAC	\$1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1
EnergyWise	\$2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2
EnergyWise Multifamily	\$1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1
Home Energy Reports	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Residential Consumer Products	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Non-Income Eligible Residential SUBTOTAL	\$4	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4
Income Eligible Residential																				
Single Family - Income Eligible Services	\$2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2
Income Eligible Multifamily	\$1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1
Income Eligible Residential SUBTOTAL	\$2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2
Commercial & Industrial																				
Large Commercial New Construction	\$13,863	\$4,874	\$198	\$156	\$384	\$380	\$2	\$730	\$395	\$462	\$280	\$570	\$0	\$0	\$1	\$184	\$1,116	\$17	\$8,990	
Large Commercial Retrofit	\$36,768	\$6,745	\$252	\$459	\$550	\$545	\$6	\$600	\$449	\$450	\$298	\$886	-\$105	\$0	\$6	\$881	\$1,456	\$12	\$30,023	
Small Business Direct Install	\$1,967	\$463	\$14	\$19	\$28	\$28	\$0	\$40	\$32	\$43	\$36	\$69	-\$4	\$0	\$0	\$30	\$126	\$2	\$1,504	
C&I SUBTOTAL	\$52,598	\$12,082	\$463	\$634	\$962	\$953	\$8	\$1,370	\$877	\$955	\$614	\$1,525	-\$108	\$0	\$7	\$1,094	\$2,698	\$31	\$40,517	
TOTAL	\$52,604	\$12,082	\$463	\$634	\$962	\$953	\$8	\$1,370	\$877	\$955	\$614	\$1,525	-\$108	\$0	\$7	\$1,094	\$2,698	\$31	\$40,523	

Table E-6A - PUC 1-20 Refiled
National Grid
Summary of 2022 Impacts by Program (Energy Efficiency Measures)

	Load Reduction in kW		Electric Energy Savings				Gas Saved		Oil Saved		Propane Saved		Total Net Savings (Electric, Gas, Oil, Propane)	
	Summer	Winter	MWh		MMBtu		MMBtu		MMBtu		MMBtu		MMBtu	
			Annual	Lifetime	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime	Annual	Lifetime
Commercial & Industrial														
Large Commercial New Construction	235	182	1,669	27,330	5,694	93,249	-	-	-	-	-	-	5,694	93,249
Large Commercial Retrofit	701	645	3,547	29,797	12,103	101,668	(2,142)	(12,629)	-	-	-	-	9,961	89,039
Small Business Direct Install	28	8	255	2,539	871	8,662	(72)	(430)	-	-	-	-	800	8,232
C&I SUBTOTAL	964	835	5,471	59,665	18,668	203,579	(2,213)	(13,059)	-	-	-	-	16,455	190,519
TOTAL	964	835	5,471	59,665	18,668	203,579	(2,213)	(13,059)	-	-	-	-	16,455	190,519

Notes:

1) Lifetime savings are equal to annual savings multiplied by the expected life of measures expected to be installed in each program.

Table E-6B - PUC 1-20 Refiled
National Grid
Summary of 2022 Demand Response Benefits and Savings

	Benefits (000's)															Load Reduction (MW)	MWh Saved				
	Total	Total (Economic Excluded)	Summer Generation	Capacity				Energy				Non Electric Non Resource	Societal		Summer				Annual	Lifetime	
				Capacity DRIPE	Trans	Dist	Reliability	Winter		Summer			Energy DRIPE	Carbon							Economic
								Peak	Off Peak	Peak	Off Peak										
Non-Income Eligible Residential																					
Residential ConnectedSoluti	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Commercial & Industrial																					
Commercial ConnectedSolu	\$2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2	\$0	\$0	\$0	\$0		
TOTAL	\$2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2	0.0	0.0	0.0	0.0		

**Table E-SA - PUC 1-20 Refiled
National Grid
2022 Electric PIM Benefits, Allocations, and Categorization (\$000)**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	
	Summer Generation	Capacity DRIPE	Capacity		Reliability	Winter Peak Energy	Winter Off Peak Energy	Energy		Electric Energy DRIPE	Utility NEIs	Non Electric			Non Resource	Carbon	Societal		
			Transmission	Distribution				Summer Peak Energy	Summer Off Peak Energy		Utility NEIs	Natural Gas and DRIPE	Oil and Oil DRIPE	Propane and Water			NOx	Economic	
Non-Income Eligible Residential																			
Residential New Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
ENERGY STAR® HVAC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1
EnergyWise	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2
EnergyWise Multifamily	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1
Home Energy Reports	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Residential Consumer Products	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
on-Income Eligible Residential SUBTOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4
Income Eligible Residential																			
Single Family - Income Eligible Services	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2
Income Eligible Multifamily	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1
Income Eligible Residential SUBTOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2
Commercial & Industrial																			
Large Commercial New Construction	\$198	\$156	\$384	\$380	\$2	\$730	\$395	\$462	\$280	\$570	\$0	\$0	\$0	\$1	\$184	\$1,116	\$17	\$8,990	
Large Commercial Retrofit	\$252	\$459	\$550	\$545	\$6	\$600	\$449	\$450	\$298	\$886	\$0	-\$105	\$0	\$6	\$881	\$1,456	\$12	\$30,023	
Small Business Direct Install	\$14	\$19	\$28	\$28	\$0	\$40	\$32	\$43	\$36	\$69	\$0	-\$4	\$0	\$0	\$30	\$126	\$2	\$1,504	
C&I SUBTOTAL	\$463	\$634	\$962	\$953	\$8	\$1,370	\$877	\$955	\$614	\$1,525	\$0	-\$108	\$0	\$7	\$1,094	\$2,698	\$31	\$40,517	
Included in PIM? (Y/N)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	
Percent Application in PIM	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	50%	50%	50%	0%	0%	0%	0%	
Category	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Electric Utility System Benefits	Resource Benefits	Resource Benefits	Resource Benefits	NA	NA	NA	NA	

Notes
From 2022 Benefit-Cost Model, reflects benefits in Table E-6

PUC 3-1 (Corrected) (Refiled)

Request:

National Grid has filed a Provisional Electric EEP with ~\$9 million dollars originally targeted at a CHP project now reallocated to other C&I New Construction projects and C&I Programs. Referencing National Grid's Provisional Plan and its response to PUC 2-17 (Please note that the Commission will refer to the Original Plan with the \$9,154,400 CHP component removed as the "**Alternative Base Plan**") and any other information relevant to this docket, please respond to the following: With respect to the \$9M of funding in the Provisional Plan that is incremental to the Alternative Base Plan, *and only those \$9M dollars within the Provisional Plan*, is National Grid's proposed use of these \$9M in the Provisional Plan

- a. Cost effective
- b. Less than the cost of supply
- c. Prudent
- d. Reliable
- e. Environmentally responsible

For each individual response to parts a-e, please explain why or why not.

Response:

This corrected response makes a correction to subsection (b).

Original subsections in PUC 3-1 (Corrected) (a and b) read as follows:

- a. Cost effective: Yes, the Company believes the \$9 million in incremental spend to be cost-effective. This spend has a primary B/C ratio (i.e. excluding any economic benefits) of 0.99; with any amount of economic benefits added, the benefit cost ratio would exceed 1.0. The Company bases this conclusion on the fact that, counting all economic benefits, the benefit cost ratio of this incremental spend is 4.33. These incremental measures are also components of larger programs that remain cost effective as a whole. The LCP Standards speak to cost-effectiveness at a program or portfolio level. Assessing the cost-effectiveness of a \$9M investment comprised of portions of programs is not contemplated by the Standards.
- b. Less than the cost of supply: No. The \$9M investment within the provisional plan is \$1,196,596 more than the cost of supply.

PUC 3-1 (Corrected) (Refiled), page 2

In reallocating these dollars, the Company did not specifically look at the incremental cost of these savings compared to the incremental cost of supply. The Company evaluated the energy efficiency costs relative to cost of supply at the portfolio level, after reallocating the \$9M to programmatic areas where the Company felt there were additional savings to be realized that aligned with stakeholder priorities. As noted in the EERMC response to PUC 1-1 (b), the Company agrees with the EERMC's perspective that the established practice is to compare energy efficiency to the cost of supply at the portfolio level, rather than comparing subsets or portions of portfolios.

Additionally, these incremental measures are also components of the larger portfolio that remains less than the cost of supply. The LCP Standards speak to energy efficiency being less than the cost of supply at a portfolio level. Assessing the cost of supply of a \$9M investment comprised of portions of programs is not contemplated by the Standards.

Corrected subsections (a and b) read as follows:

- a. Cost effective: Yes, the Company believes the \$9 million in incremental spend to be cost-effective. This spend has a primary B/C ratio (i.e. excluding any economic benefits) of 2.25. These incremental measures are also components of larger programs that remain cost effective as a whole. The LCP Standards speak to cost-effectiveness at a program or portfolio level. Assessing the cost-effectiveness of a \$9M investment comprised of portions of programs is not contemplated by the Standards.
- b. Less than the cost of supply: Yes. The \$9M investment within the provisional plan is \$5,159,450 less than the cost of supply.

In reallocating these dollars, the Company did not specifically look at the incremental cost of these savings compared to the incremental cost of supply. The Company evaluated the energy efficiency costs relative to cost of supply at the portfolio level, after reallocating the \$9M to programmatic areas where the Company felt there were additional savings to be realized that aligned with stakeholder priorities. As noted in the EERMC response to PUC 1-1 (b), the Company agrees with the EERMC's perspective that the established practice is to compare energy efficiency to the cost of supply at the portfolio level, rather than comparing subsets or portions of portfolios.

PUC 3-1 (Corrected) (Refiled), page 3

Additionally, these incremental measures are also components of the larger portfolio that also remains less than the cost of supply. The LCP Standards speak to energy efficiency being less than the cost of supply at a portfolio level. Assessing the cost of supply of a \$9M investment comprised of portions of programs in not contemplated by the Standards.

The full answer, with all subsections, as corrected reads as follows:

Please see Attachment PUC 1-20 Refiled for E-2, E-5, E-5 Secondary, E-5A, E-6, E-6A, E-6B, and E-8A consisting of only the reallocated \$9,154,400 in the Provisional Plan.

- a. Cost effective: Yes, the Company believes the \$9 million in incremental spend to be cost-effective. This spend has a primary B/C ratio (i.e. excluding any economic benefits) of 2.25. These incremental measures are also components of larger programs that remain cost effective as a whole. The LCP Standards speak to cost-effectiveness at a program or portfolio level. Assessing the cost-effectiveness of a \$9M investment comprised of portions of programs is not contemplated by the Standards.
- b. Less than the cost of supply: Yes. The \$9M investment within the provisional plan is \$5,159,450 less than the cost of supply.

In reallocating these dollars, the Company did not specifically look at the incremental cost of these savings compared to the incremental cost of supply. The Company evaluated the energy efficiency costs relative to cost of supply at the portfolio level, after reallocating the \$9M to programmatic areas where the Company felt there were additional savings to be realized that aligned with stakeholder priorities. As noted in the EERMC response to PUC 1-1 (b), the Company agrees with the EERMC's perspective that the established practice is to compare energy efficiency to the cost of supply at the portfolio level, rather than comparing subsets or portions of portfolios.

Additionally, these incremental measures are also components of the larger portfolio that also remains less than the cost of supply. The LCP Standards speak to energy efficiency being less than the cost of supply at a portfolio level. Assessing the cost of supply of a \$9M investment comprised of portions of programs in not contemplated by the Standards.

PUC 3-1 (Corrected) (Refiled), page 4

- c. Prudent: Yes. The incremental \$9 million is prudent because this investment will provide energy that is lower than the cost of supply for Rhode Island customers while being part of an overall portfolio of energy efficiency programs that adheres to the PUC's guidance of limiting budget growth to 5% (and managing associated 2022 rate and bill impacts to customers).
- d. Reliable: Yes, the incremental \$9 million is reliable because it contributes to meeting the state's energy needs as well as providing for stability and sustainable growth in the state's energy efficiency programs.
- e. Environmentally responsible: Yes, the incremental \$9 million is environmentally responsible because this investment reduces CO2 emissions by an additional 22,028 tons from the Alternative Base Plan and contributes directly to meeting the Act on Climate's goals.