

December 10, 2021

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

Re: Docket No. 5195: Pascoag Utility District - 2022 Demand Side Management Plan

Dear Commission:

The Rhode Island Office of Energy Resources (OER) respectfully submits these comments in strong support of Pascoag Utility District's (PUD) 2022 Demand Side Management Plan (2022 DSM Plan or Plan) that was filed with the Public Utilities Commission (Commission) on November 8, 2021 under Docket #5195. OER urges the Commission to approve the Plan as filed.

PUD's proposed 2022 DSM Plan continues their ongoing investment in providing important energy saving measures and education to their customers. The 2022 DSM Plan is expected to result in substantial cost-effective energy and demand savings, while contributing to PUD's ability to deliver clean, affordable, and reliable energy to local customers. The Plan also continues to showcase the District's commitment to equity through the continuation of their pilot program providing audit and weatherization incentives for rental housing units. In addition, PUD's facilitation of numerous points of engagement for customers, including online, in-person, and via mail, ensure all customers will be informed of and have access to these important energy saving programs. Delivering these energy and bill savings to customers, especially the most vulnerable, is even more critical as the economy continues its recovery from the ongoing impacts of the COVID-19 pandemic. Furthermore, Plan is well-aligned with broader state energy goals including, but not limited to, the 2021 Act on Climate and support for our clean energy economy.

The 2022 DSM Plan demonstrates PUD's continued commitment to delivering high quality, effective energy efficiency measures and continual program improvement. The Plan provides robust support for foundational energy efficiency measures such as home energy audits and weatherization that deliver both immediate and long-lasting energy savings to customers, while also serving as an important entry point on a customer's energy investment journey. PUD's continued investment in these core programmatic areas will help ensure a robust pipeline of projects and the delivery of critical energy savings to customers. PUD has also proposed an enhanced incentive pilot program for their electric resistance heating customers to provide them with the opportunity to transition to more efficient heat pump technology. This pilot program will provide significant energy savings opportunities, grid benefits, and carbon reductions in this important community.



Since 2018, OER has been part of a fruitful collaboration with PUD to more thoroughly understand the energy efficiency needs and opportunities in the Pascoag community, and to develop strategies to enhance and scale up PUD's existing DSM programs and incentives. These strategies are outlined in Schedule H of PUD's DSM filing. The District's commitment to cost-effective energy efficiency and greenhouse gas reduction measures is why OER has invested additional state Regional Greenhouse Gas Initiative (RGGI) funds supporting the continued delivery of these programs and incentives. In the 2021-B RGGI Allocation plan, an additional \$120,000.00 will be invested over three years (2022-2024) for energy efficiency programming in PUD, and leveraged with ratepayer collections. By 2025, OER anticipates that PUD's DSM programs will transition to operating solely on ratepayer funds.

OER is excited to continue its clean energy collaboration with PUD. We are confident that Pascoag residents and businesses will realize substantial energy, economic, and environmental benefits as a result of the programs advanced through the 2022 DSM Plan, and respectfully request that the Commission approve the Plan as filed.

Thank you for your consideration.

Sincerely,

Nicholas S. Ucci Commissioner