

June 16, 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
Responses to PUC Post-Decisional Data Requests – Set 3**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), attached please find the Company’s responses to the Third Set of Post Decisional Data Requests issued by the Public Utilities Commission (“PUC”) on June 8, 2022 and reissued on June 9, 2022 in the above-referenced docket. Please note that the Company received an extension to June 23, 2022 to file its response to 3-1.

This filing also contains three motions: 1) Motion of The Narragansett Electric Company Objecting to Data Request 3-10 from the Public Utilities Commission; 2) Motion of The Narragansett Electric Company for Protective Treatment of Confidential Information for Attachment 3-10-2; and 3) Motion of The Narragansett Electric Company for Protective Treatment of Confidential Information for the Confidential Attachments PUC 3-4-1 through PUC 3-4-29 and Confidential Attachments PUC 3-5-1 through PUC 3-5-20.

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

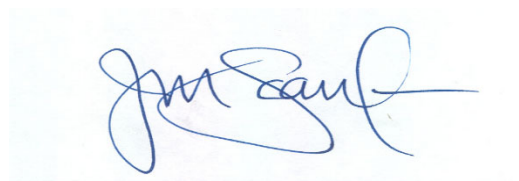
Enclosures

cc: Docket 5189 Service List
Margaret Hogan, Esq. (w/confidential attachments)
Christy Hetherington, Esq. (w/confidential attachments)
John Bell, Division (w/confidential attachments)
Joel Munoz (w/confidential attachments)

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

June 16, 2022
Date

Docket No. 5189 – Rhode Island Energy – 2022 Annual Energy Efficiency Program - Service list updated 6/9/2022

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

THE NARRAGANSETT ELECTRIC COMPANY)
D/B/A RHODE ISLAND ENERGY’S 2022)
ANNUAL ENERGY EFFICIENCY PLAN)

DOCKET NO. 5189

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY d/b/a
RHODE ISLAND ENERGY OBJECTING TO DATA REQUEST 3-10
FROM THE PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby objects in part, pursuant to Section 1.19(C)(3) of the Public Utilities Commission (the “Commission” or “PUC”) Rules and Regulations, to the Commission’s Post-Decisional Data Request 3-10 issued on June 8, 2022 in the above referenced docket (“Data Request 3-10”). As grounds for its objection, the Company submits that its response to Data Request 3-10 is, in part, privileged attorney-client communications and attorney work product.

Background

The Company has identified two documents that are responsive to Data Request 3-10: (1) a Rhode Island Energy Efficiency Investigation Report (“Attachment PUC 3-10-1”)¹; and (2) an Updated Forensic Accounting Summary (“Attachment PUC 3-10-2” or the “Updated Forensic Summary”) prepared at the direction of Rhode Island Energy’s internal counsel. The Company first filed a Forensic Summary with the PUC on January 21, 2022 in response to Record Request No. 5. The Company objected to filing the Forensic Summary at that time on the basis that the

¹ The Company does not claim Attachment PUC 3-10-1 is privileged.

document contained attorney-client communications and attorney work product. Following its January 2022 filing, the Company received the Updated Forensic Summary.

The Company objects to Data Request 3-10 to the extent it seeks privileged attorney-client communications and attorney work product, specifically, the Updated Forensic Summary. The Company respectfully asserts that the Updated Forensic Summary consists of privileged attorney-client communications and attorney work product protected from disclosure. The Company is also seeking protective treatment of the Updated Forensic Summary because it is also a document relating to a client/attorney relationship, is work product and a preliminary draft which is excepted from the definition of public records contained in R.I. Gen. Laws § 38-2-2. See R.I. Gen. Laws § 38-2-2 (A)(I)(a) and (K).

Analysis

Privileged Attorney-Client Communication

In order “to encourage full and frank communications between attorneys and their clients,” the Rhode Island Supreme Court has long recognized that “communications made by a client to his attorney for the purpose of seeking professional advice, as well as the responses by the attorney to such inquiries, are privileged communications not subject to disclosure.” DeCurtis v. Visconti, Boren & Campbell, Ltd., 152 A.3d 413, 423 (R.I. 2017) (quoting Mortgage Guarantee & Title Co. v. Cunha, 745 A.2d 156, 158–59 (R.I. 2000)). “Genuine attorney-client communications are afforded the highest level of protection by our courts.” Id. the party asserting the privilege must set forth the following elements:

- (1) the asserted holder of the privilege is or sought to become a client;
- (2) the person to whom the communication was made (a) is [the] member of a bar of a court, or his subordinate and (b) in connection with this communication is acting as a lawyer;
- (3) the communication relates to a fact of which the attorney was informed (a) by his client (b) without the presence of strangers (c) for the purpose of securing primarily either (i) an opinion on law or (ii) legal services

or (iii) assistance in some legal proceeding, and not (d) for the purpose of committing a crime or tort; and (4) the privilege has been (a) claimed and (b) not waived by the client.

DeCurtis, 152 A.3d at 423 (internal citations and quotations omitted)

Attorney Work Product

While the attorney-client privilege covers only confidential communications between attorney and client, the work-product privilege, on the other hand, “protects both the attorney-client relationship and a complex of individual interests particular to attorneys that their clients may not share.” State v. von Bulow, 475 A.2d 995, 1009 (R.I. 1984) (quoting In Re Sealed Case, 676 F.2d at 809)). The work product doctrine protects certain materials “obtained or prepared by an adversary’s counsel with an eye toward litigation” State v. von Bulow, 475 A.2d 995, 1008 (R.I. 1984) (quoting Hickman v. Taylor, 329 U.S. 495 (1947)).

The Rhode Island Supreme Court has recognized that there are two types of work product: opinion work product and factual work product. DeCurtis v. Visconti, Boren & Campbell, Ltd., 152 A.3d 413, 427–28 (R.I. 2017) (citing Henderson v. Newport Cty. Reg’l Young Men’s Christian Ass’n, 966 A.2d 1242, 1247-48) (R.I. 2009). Opinion work product “refers to a document or other written material containing the mental impressions of an attorney or his or her legal theories” and receives “absolute immunity from discovery.” Id. at 428. Factual work product casts a wider net and covers “any material gathered in anticipation of litigation.” Id. “Because factual work product does not include the actual thoughts of the attorney, it is afforded only qualified immunity from discoverability.” Id.

Factual work product is only subject to disclosure when “the party seeking discovery demonstrates a substantial need for the materials and that it cannot obtain the substantial equivalent without undue hardship.” DeCurtis, 152 A.3d at 428 (quoting Crowe Countryside Realty

Associates, Co., LLC v. Novare Engineers, Inc., 891 A.2d 838, 842 (R.I. 2006)). Factual work product encompasses any material gathered in anticipation of litigation. Importantly, it is not necessary for the attorney to have prepared the materials or the documents for them to constitute work product. Rather, a document prepared by a party's representative or agent constitutes factual work product as long as the document was prepared in anticipation of litigation. Henderson v. Newport Cty. Reg'l Young Men's Christian Ass'n, 966 A.2d 1242, 1248 (R.I. 2009). Additionally, work product privilege "applies not only to litigation in courts, but litigation before administrative tribunals." S. Union Co. v. Sw. Gas Corp., 205 F.R.D. 542, 549 (D. Ariz. 2002) (quoting United States v. Am. Telephone & Telegraph Co., 86 F.R.D. 603, 627 (D.D.C. 1979)).

Applying this legal framework to the facts of this proceeding, the Updated Forensic Summary should be treated as privileged because it constitutes attorney-client communications and/or attorney work product. The Updated Forensic Summary was prepared at the direction of counsel to gather information to aid in providing legal services. See Voelker v. Deutsche Bank AG, No. 11-CV-6362 VEC, 2014 WL 4473351, at *1 (S.D.N.Y. Sept. 11, 2014) ("in the corporate context, the privilege may extend to communications among non-attorneys if they were made 'at the direction of counsel, to gather information to aid counsel in providing legal services'"). Specifically, the Updated Forensic Summary was necessary for the Company's internal counsel to assess the scope of the misconduct it discovered concerning untimely invoices and to be able to provide legal opinion on the next steps needed to correct any existing Energy Efficiency accounting and prepare for future regulatory proceeding.

Notwithstanding the Company's objection, in an effort to provide the PUC information surrounding the out of period invoices, the Company has filed the Updated Forensic Summary with redactions.²

For the reasons discussed herein, the Company objects, in part, to the PUC's Data Request 3-10 to the extent it seeks privileged attorney client communications and attorney work product.

Respectfully submitted,

RHODE ISLAND ENERGY
By its attorney,

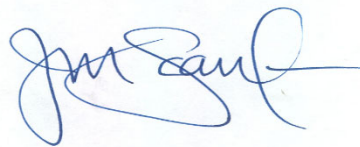


Andrew S. Marcaccio (#8168)
Rhode Island Energy
280 Melrose Street
Providence, RI 02907
(401) 784-4263

Dated: June 16, 2022

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2022, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 5189.



Joanne M. Scanlon

² As noted, the Company will seek protective treatment of the entirety of the Updated Forensic Summary because it as a document relating to a client/attorney relationship, work product and a preliminary draft. See R.I.G.L. § 38-2-2 (A)(I)(a) and (K).

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC COMPANY)	
D/B/A RHODE ISLAND ENERGY'S 2022)	
ANNUAL ENERGY EFFICIENCY PLAN)	DOCKET NO. 5189
)	
)	

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
RHODE ISLAND ENERGY FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC” or “Commission”) grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The record that is the subject of this Motion that requires protective treatment from public disclosure is Attachment PUC 3-10-2 which was filed by the Company on June 16, 2022 in response to Post-Decisional Data Request 3-10 issued by the Commission on June 8, 2022. Attachment PUC 3-10-2 consists of a Forensic Accounting Summary prepared at the direction of the Company’s internal counsel pertaining to the lighting invoices. The Company requests protective treatment of Attachment PUC 3-10-2 in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B).

I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act (“APRA”), R.I. Gen. Laws § 38-2-1 et

seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

II. BASIS FOR CONFIDENTIALITY

Attachment PUC 3-10-2 is exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2 because it was made at the direction of the Company's attorney in order to facilitate the attorney's legal representation, it should also be exempt from disclosure as a document relating to a client/attorney relationship. See § 38-2-2 (A)(I)(a); see also Voelker v. Deutsche Bank AG, No. 11-CV-6362 VEC, 2014 WL 4473351, at *1 (S.D.N.Y. Sept. 11, 2014) ("in the corporate context, the privilege may extend to communications among non-attorneys if they were made 'at the direction of counsel, to gather information to aid counsel in providing legal services'"). Moreover, Attachment PUC 3-10-2 is work product that is exempt from disclosure pursuant to the APRA. See § 38-2-2 (K) (exempting "Preliminary drafts, notes, impressions, memoranda, working papers, and work products . . ." from public disclosure).

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of Attachment PUC 3-10-2.

Respectfully submitted,

RHODE ISLAND ENERGY

By its attorney,

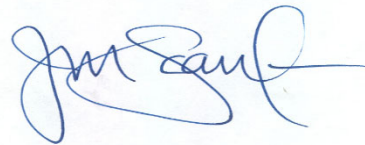


Andrew S. Marcaccio (#8168)
Rhode Island Energy
280 Melrose Street
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Dated: June 16, 2022

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Joanne M. Scanlon

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC COMPANY)	
D/B/A RHODE ISLAND ENERGY'S 2022 ANNUAL)	
ENERGY EFFICIENCY PLAN)	DOCKET NO. 5189

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
RHODE ISLAND ENERGY FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC” or “Commission”) grant protection from public disclosure certain confidential information submitted by the Company. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The record that is the subject of this Motion and requires protective treatment is the names and identifying email addresses contained in Attachments PUC 3-4-1 through 3-4-29 and Attachment PUC 3-5-1 through 3-5-20 in the Company’s response to the PUC’s Third Set of Post-Decisional Data Requests issued on June 9, 2022 which were filed by the Company on June 16, 2022. The Company requests protective treatment of the Confidential Attachments in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(A)(I)(b).

I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the Access to Public Records Act (“APRA”), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental agency in connection with the transaction of official business is considered public unless such

record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

Alternatively, the Rhode Island Supreme Court has noted that the agencies making determinations as to the disclosure of information under APRA may apply a balancing test. *See Providence Journal v. Kane*, 577 A.2d 661 (R.I. 1990). Under this balancing test, after a record has been determined to be public, the Board may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies. *Kane*, 557 A.2d at 663 (“Any balancing of interests arises only after a record has first been determined to be a public record.”).

II. BASIS FOR CONFIDENTIALITY

The names and identifying email addresses contained in Attachments PUC 3-4-1 through 3-4-29 and in Attachments PUC 3-5-1 through 3-5-20 (“Confidential Attachments”), which are the subject of this Motion, are exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2. Specifically, the names and identifying email addresses of certain Company employees and vendors contained in the Confidential Attachments are “[p]ersonnel and other personal individually identifiable records,” and disclosing their names and identifying email addresses “would constitute a clearly unwarranted invasion of personal privacy.” *See* R.I. Gen. Laws § 38-2-2(4)(A)(I)(b). As part of the Company’s internal investigation into instances of invoices for payment of energy efficiency programs being reflected in an incorrect program year (out-of-period invoices), the Company reviewed and identified email exchanges between Company employees and vendors whereby the vendors were instructed to hold their invoices until the follow program

year. The Company now seeks to keep from public disclosure the names and email addresses of the individuals involved as this information is “[p]ersonnel and other personal individually identifiable records,” and is therefore exempt from public disclosure pursuant to § 38-2-2 (A)(I)(b).

Alternatively, if the Commission disagrees and determines that the names and email addresses are public information, the Company requests protective treatment of this information on the basis that the benefit of such protection to these employees and vendors outweighs the public interest inherent in disclosure of information. *See Providence J. Co. v. Kane, 577 A.2d 661, 663 (R.I. 1990)*. Here, the public’s interest is in the substance of the emails which the Company is not claiming to be confidential. The Company believes that the benefit of protecting the names of the individuals involved far exceeds and outweighs any interest in disclosure.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of the names and email addresses contained in Attachments PUC 3-4-1 through 3-4-29 and Attachment PUC 3-5-1 through 3-5-20.

Respectfully submitted,

RHODE ISLAND ENERGY

By its attorney,

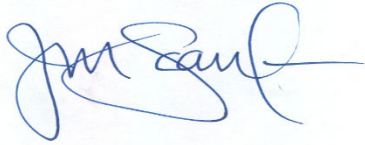


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Joanne M. Scanlon

PUC Post-Decisional 3-2

Request:

Please provide a version of Exhibit A that includes three additional columns (one for each method) that shows the performance incentive adjustment for each program under each of the three methods. Please add a row showing the summation of each of these three additional columns. Please also provide an explanation of what the column labeled "Actual Implementation Expenses %" represents and its significance to this review.

Response:

Please see Attachment PUC 3-2 and see below explanation of what the column labeled "Actual Implementation Expenses %" represents and its significance to this review.

The Actual Implementation Expenses shown in Exhibit A represent the implementation expenses which appear in the "Table 1's" within the corresponding Year-End Report. The percentage shown, for each program, represents the allocable base when compared to all of the implementation expenses for all at-issue programs.

Actual Implementation Expenses represent a consistent and linear method to allocate performance incentive across the various programs. Since these programs appear in both the electric and gas portfolios, energy savings amounts were not used to allocate since they are not comparable (e.g., MMBtu for gas and kW/MWh for electric).

PI Adjustment by Program

PI Change: (\$1,400,423) (\$1,569,887) (\$2,194,339)

Seq	Year	Utility	Sector	Program	Actual Implementation Expenses (\$000)	Actual Implementation Expenses, %	Method 1	Method 2	Method 3
1	2012	Electric	Non-Low Income Residential	Residential New Construction	\$1,259	0.70%	-\$9,762	-\$10,943	-\$15,296
2	2013	Electric	Commercial & Industrial	Large Commercial New Construction	\$8,626	4.78%	-\$66,882	-\$74,976	-\$104,799
3	2013	Electric	Commercial & Industrial	Large Commercial Retrofit	\$7,854	4.35%	-\$60,892	-\$68,261	-\$95,413
4	2013	Gas	Non-Low Income Residential	Energy Star® HVAC	\$2,919	1.62%	-\$22,629	-\$25,367	-\$35,458
5	2013	Gas	Non-Low Income Residential	EnergyWise	\$4,530	2.51%	-\$35,120	-\$39,370	-\$55,030
6	2015	Electric	Low Income Residential	Single Family - Income Eligible Services	\$7,068	3.91%	-\$54,800	-\$61,431	-\$85,866
7	2015	Electric	Low Income Residential	Income Eligible Multifamily	\$2,320	1.28%	-\$17,990	-\$20,167	-\$28,188
8	2015	Gas	Commercial & Industrial	Large Commercial New Construction	\$1,844	1.02%	-\$14,295	-\$16,024	-\$22,398
9	2015	Gas	Commercial & Industrial	Large Commercial Retrofit	\$3,227	1.79%	-\$25,020	-\$28,047	-\$39,204
10	2016	Electric	Commercial & Industrial	Large Commercial New Construction	\$5,417	3.00%	-\$42,001	-\$47,083	-\$65,811
11	2016	Electric	Commercial & Industrial	Large Commercial Retrofit	\$19,719	10.92%	-\$152,890	-\$171,391	-\$239,564
12	2016	Electric	Commercial & Industrial	Small Business Direct Install	\$6,994	3.87%	-\$54,230	-\$60,792	-\$84,973
13	2016	Electric	Low Income Residential	Income Eligible Multifamily	\$2,067	1.14%	-\$16,024	-\$17,963	-\$25,108
14	2016	Electric	Non-Low Income Residential	Energy Star® HVAC	\$1,170	0.65%	-\$9,070	-\$10,167	-\$14,212
15	2016	Electric	Non-Low Income Residential	EnergyWise	\$8,906	4.93%	-\$69,054	-\$77,410	-\$108,202
16	2016	Electric	Non-Low Income Residential	ENERGY STAR® Lighting	\$7,706	4.27%	-\$59,747	-\$66,976	-\$93,617
17	2016	Electric	Non-Low Income Residential	Residential Consumer Products	\$1,706	0.94%	-\$13,230	-\$14,831	-\$20,730
18	2016	Gas	Commercial & Industrial	Large Commercial New Construction	\$1,664	0.92%	-\$12,902	-\$14,463	-\$20,216
19	2016	Gas	Commercial & Industrial	Large Commercial Retrofit	\$3,740	2.07%	-\$28,995	-\$32,504	-\$45,433
20	2016	Gas	Commercial & Industrial	Small Business Direct Install	\$134	0.07%	-\$1,037	-\$1,163	-\$1,625
21	2016	Gas	Commercial & Industrial	Commercial & Industrial Multifamily	\$580	0.32%	-\$4,498	-\$5,042	-\$7,048
22	2016	Gas	Non-Low Income Residential	Energy Star® HVAC	\$1,253	0.69%	-\$9,712	-\$10,887	-\$15,218
23	2016	Gas	Non-Low Income Residential	Residential New Construction	\$847	0.47%	-\$6,567	-\$7,361	-\$10,290
24	2017	Electric	Low Income Residential	Single Family - Income Eligible Services	\$8,211	4.55%	-\$63,660	-\$71,363	-\$99,749
25	2017	Electric	Non-Low Income Residential	Residential New Construction	\$1,142	0.63%	-\$8,856	-\$9,928	-\$13,877
26	2017	Electric	Non-Low Income Residential	Energy Star® HVAC	\$1,587	0.88%	-\$12,305	-\$13,794	-\$19,281
27	2017	Electric	Non-Low Income Residential	EnergyWise Multifamily	\$2,039	1.13%	-\$15,810	-\$17,723	-\$24,773
28	2017	Electric	Non-Low Income Residential	ENERGY STAR® Lighting	\$8,966	4.96%	-\$69,515	-\$77,927	-\$108,925
29	2017	Electric	Non-Low Income Residential	Residential Consumer Products	\$2,307	1.28%	-\$17,890	-\$20,055	-\$28,032
30	2017	Gas	Commercial & Industrial	Large Commercial New Construction	\$2,082	1.15%	-\$16,146	-\$18,100	-\$25,299
31	2017	Gas	Commercial & Industrial	Large Commercial Retrofit	\$4,608	2.55%	-\$35,728	-\$40,052	-\$55,983
32	2017	Gas	Commercial & Industrial	Commercial & Industrial Multifamily	\$795	0.44%	-\$6,163	-\$6,908	-\$9,656
33	2017	Gas	Low Income Residential	Single Family - Income Eligible Services	\$3,925	2.17%	-\$30,434	-\$34,117	-\$47,688

Seq	Year	Utility	Sector	Program	Actual Implementation Expenses (\$000)	Actual Implementation Expenses, %	Method 1	Method 2	Method 3
34	2017	Gas	Non-Low Income Residential	Energy Star® HVAC	\$1,584	0.88%	-\$12,283	-\$13,770	-\$19,247
35	2017	Gas	Non-Low Income Residential	EnergyWise Multifamily	\$1,145	0.63%	-\$8,881	-\$9,956	-\$13,916
36	2017	Gas	Non-Low Income Residential	Residential New Construction	\$920	0.51%	-\$7,134	-\$7,998	-\$11,179
37	2018	Electric	Commercial & Industrial	Small Business Direct Install	\$5,982	3.31%	-\$46,383	-\$51,995	-\$72,678
38	2018	Electric	Non-Low Income Residential	ENERGY STAR® Lighting	\$10,705	5.93%	-\$82,998	-\$93,041	-\$130,050
39	2018	Electric	Non-Low Income Residential	Residential New Construction	\$767	0.42%	-\$5,947	-\$6,667	-\$9,318
40	2018	Gas	Commercial & Industrial	Small Business Direct Install	\$143	0.08%	-\$1,109	-\$1,243	-\$1,737
41	2018	Gas	Commercial & Industrial	Commercial & Industrial Multifamily	\$815	0.45%	-\$6,318	-\$7,083	-\$9,900
42	2018	Gas	Low Income Residential	Single Family - Income Eligible Services	\$4,225	2.34%	-\$32,755	-\$36,719	-\$51,324
43	2018	Gas	Low Income Residential	Income Eligible Multifamily	\$2,420	1.34%	-\$18,764	-\$21,034	-\$29,401
44	2018	Gas	Non-Low Income Residential	Residential New Construction	\$640	0.35%	-\$4,964	-\$5,565	-\$7,778
45	2020	Electric	Commercial & Industrial	Small Business Direct Install	\$7,508	4.16%	-\$58,215	-\$65,259	-\$91,217
46	2020	Electric	Non-Low Income Residential	Residential New Construction	\$950	0.53%	-\$7,362	-\$8,253	-\$11,535
47	2020	Electric	Non-Low Income Residential	Energy Star® HVAC	\$3,364	1.86%	-\$26,083	-\$29,239	-\$40,869
48	2020	Electric	Non-Low Income Residential	Residential Consumer Products	\$2,241	1.24%	-\$17,376	-\$19,479	-\$27,227
					\$180,623	100.00%	-\$1,400,423	-\$1,569,887	-\$2,194,339
Electric Commercial & Industrial					\$62,101	34.38%	-\$481,492	-\$539,756	-\$754,455
Electric Non-Low Income Residential					\$54,816	30.35%	-\$425,004	-\$476,434	-\$665,944
Electric Low Income Residential					\$19,666	10.89%	-\$152,473	-\$170,924	-\$238,912
Gas Commercial & Industrial					\$19,632	10.87%	-\$152,211	-\$170,629	-\$238,500
Gas Non-Low Income Residential					\$13,838	7.66%	-\$107,291	-\$120,274	-\$168,115
Gas Low Income Residential					\$10,570	5.85%	-\$81,953	-\$91,870	-\$128,413
					\$180,623	100.00%	-\$1,400,423	-\$1,569,887	-\$2,194,339

PUC Post-Decisional 3-3

Request:

Please provide schedules showing how the actual yearly out-of-period percentages were calculated in Phase 1. Also please identify each of the programs on Exhibit A of the Review that are included in the calculation of the actual yearly out-of-period percentages that were calculated in Phase 1.

Response:

The actual yearly out-of-period percentages in Phase 1 were calculated by dividing the "Total Out of Period Costs Identified" (as explained below) by the "Sampled Total Program Spend, Per InDemand." Please see Attachment PUC 3-3. The programs listed in Attachment PUC 3-3 also represent each of the programs on Exhibit A of the Review that are included in the calculation of the actual yearly out-of-period percentages that were calculated in Phase 1.

The "Total Out of Period Costs Identified" stem from a robust transaction analysis on the Rhode Island Energy Efficiency Residential Upstream Lighting Program ("Residential Upstream Lighting") conducted during Phase 1. This transaction analysis, which was sample based and focused on the top nine manufacturers - based on incentive paid to those manufacturers, looked at 1859 unique invoices. Since the analysis was sample based, the out of period percentages were adjusted (or normalized) to account for the total incentives paid out as part of Residential Upstream Lighting from January 1, 2016 to June 30, 2021. By adjusting (or normalizing) the out of period percentages, this assumes that there are no other out of period invoices in the incentive payment population.

Out of Period Percentage Calculations

Utility	Sector	Program	Plan Year	Total Program Spend, Per InDemand	Total Out of Period Costs Identified	Out of Period Percentage
Electric	Non-Low Income Residential	ENERGY STAR® Lighting	2016	\$6,360,475	\$908,744	14.29%
Electric	Non-Low Income Residential	ENERGY STAR® Lighting	2017	\$8,148,019	\$660,823	8.11%
Electric	Non-Low Income Residential	ENERGY STAR® Lighting	2018	\$9,699,570	\$2,322,316	23.94%
Electric	Non-Low Income Residential	ENERGY STAR® Lighting	2019	\$11,779,915	\$2,307,219	19.59%
Electric	Non-Low Income Residential	ENERGY STAR® Lighting	2020	\$7,311,487	\$924,503	12.64%
Electric	Non-Low Income Residential	ENERGY STAR® Lighting	2021	\$2,555,338	\$480,079	18.79%
				\$45,854,804	\$7,603,684	16.58%

PUC Post-Decisional 3-4

Request:

Referencing page 8 of the Review, please produce a copy of the 29 email exchanges where the Company concluded that the email explicitly demonstrated that delaying invoices was implemented. Please also identify which of the programs on Exhibit A each email chain is related to.

Response:

Please see Attachment PUC 3-4-1 through Attachment PUC 3-4-29 for copies of each email exchange.

Please see Attachment PUC 3-4-30 which includes a column entitled "Email Ref" that identifies the related email chain for each program.

To: [Redacted]
Cc: [Redacted]
From: [Redacted]

Sent: Fri 12/21/2012 7:38:55 PM (UTC)
Subject: RE: Dec NGRID E NC Unit/Admin Invoice - Upload

Thanks [Redacted] Take your time, have them uploaded anytime January 2nd.

From: [Redacted]
Sent: Friday, December 21, 2012 2:28 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: Dec NGRID E NC Unit/Admin Invoice - Upload

[Redacted] see below. All New Construction December invoices have been cancelled. What date would you like us to re-upload?

Invoice Number	Distribution Company	Vendor Invoice Number	Vendor Name	Invoice Create Date	Invoice Amount	Invoice Status	Invoice Status Date	
60265	MECO	NC12_12NGRID	ICF RESOURCES LLC	12/19/2012	\$94,596.10	Cancelled	12/21/2012	View
60030	CLW	NC12_12NGRIDL	ICF RESOURCES LLC	12/17/2012	\$13,728.60	Cancelled	12/21/2012	View
60026	CLW	NC12_12NGRIDC	ICF RESOURCES LLC	12/17/2012	\$8,831.53	Cancelled	12/21/2012	View
60024	BGC	NC12_12NGRIDE	ICF RESOURCES LLC	12/17/2012	\$6,090.86	Cancelled	12/21/2012	View
60022	BGC	NC12_12NGRIDB	ICF RESOURCES LLC	12/17/2012	\$164,906.50	Cancelled	12/21/2012	View

Best Regards,

[Redacted Signature]

ICF INTERNATIONAL | 100 Cambridgepark Drive, Suite 500, Cambridge, MA 02140 | 617.250.4261 (f)

From: [Redacted]
Sent: Friday, December 21, 2012 2:18 PM
To: [Redacted]
Cc: [Redacted]

As discussed and agreed with [REDACTED] all invoices pushed over to next year must be removed by the end of the day today or otherwise accrued manually for 2012. To avoid any confusion , I would you to remove them or advise me to do it in my end . Accrued payments are still going through inDemand for all our programs , and at this time and point , I have no confidence to the hear end team closing , to differentiate between the uploads in InDemand . So to stay in safer side , I will suggest removing all the ICF invoices and re upload them back in week one of January Again, I apologize for any inconvenience .

Thanks ,
[REDACTED]

From: [REDACTED]
Sent: Wednesday, December 19, 2012 1:12 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Dec NGRID E NC Unit/Admin Invoice - Upload

[REDACTED] I have uploaded and invoiced the work package for NGRID E NC Unit/Admin. I have not filled in any admin costs because, per your discussion with [REDACTED] the admin will be "0" this month due to the credit. I am waiting for our finance department to finalize the invoice that reflects "0" for admin. When this is complete I will upload it to the system. The builder invoice is uploaded already.

Best Regards,
[REDACTED]

ICF INTERNATIONAL | 100 Cambridgepark Drive, Suite 500, Cambridge, MA 02140 | 617.250.4261 (f)

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For more information please visit <http://www.symanteccloud.com>

To: [REDACTED]
Cc: [REDACTED]
From: [REDACTED]
Sent: Mon 1/27/2014 1:45:41 PM (UTC)
Subject: RE: RI LCI-e projects

Thanks much [REDACTED]
If it's in the customer's court, there's only so much we can do. I'm just trying to get a handle on the final number we expect to have, both on budget and savings. Fortunately, we're in a really good place for both on 2013; if it ends up going for 2014, that will be fine.
Cheers,
[REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2014 5:17 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: RI LCI-e projects

Hi [REDACTED]
[REDACTED]: Rise is working with the customer to get to a position where they can sign the Cert. This will probably go down to the wire Olney St. Baptist: [REDACTED] and I have made many attempts to reach the contact person. I spoke with the church secretary today and they are aware of our repeated requests. This may go to 2014
[REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2014 4:08 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: RI LCI-e projects

Hi [REDACTED]
The 2014 ones are mostly not on EEAs radar / we may not have invoices / signatures in yet and we will not process based on your comment below that RI 2013 budget is tight.

Regarding 2013:
Manton : [REDACTED] has been waiting on Cert of install for awhile now. Owner has the document but won't sign it. [REDACTED] will make another call on Monday morning to the customer. [REDACTED] any additional ideas on this?
Olney St Baptist: [REDACTED] has been trying to get the W9 from the Church admin, but still no response. [REDACTED] will try the PEX again on Monday morning. [REDACTED] any additional ideas on this?
Union: Wating on Vendor to issue another Invoice - [REDACTED] are on this one. Please provide update on Monday.
Brown: Paid by [REDACTED] this week

Hope that helps.
[REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2014 3:57 PM
To: [REDACTED]
Subject: RI LCI-e projects

Hi [REDACTED]
There are a number of projects that were accrued that are still outstanding:
All of these appear to be projects that were "complete" as of 12/31, even though some of them were pushed out to 2014. There doesn't appear to be an administrative reason why we can't pay these projects, though many of them don't seem to be being moved forward. The projects with 2013 expected completion dates (Manton, Union, Brown-Horace Mann, Olney) should be on the list of apps to be moved forward since they've always been on the radar for "pending 3013 apps." The remainder the 2014 apps that were accrued also should probably be paid but we're at 100% of goal and budget, and I'm not sure we can absorb the entire incentive cost within the budget we have for 2013 with out triggering regulatory review/approval.
Are your folks specifically holding off on processing 2014 apps at this point?

<< OLE Object: Microsoft Excel Worksheet >>



To:

From:

Sent: Fri 12/20/2013 5:00:21 PM (UTC)

Subject: RI Gas Overspending -- Year End Accruals and Game Plan

Everyone,

Happy Holidays! I wanted to inform everyone that our team is projecting an overspend in RI Gas that is very close to 10%. It is in our best interest to avoid overspending by 10% of our budget. This email lays out a plan for year-end and January to avoid that.

We got some advice from the RA group regarding a year end process we can use to manage the situation. First, please accrue anything that the Company has an obligation to pay in 2013. Second, it's the program managers discretion when to authorize payment on those accruals. Therefore we're asking that you not authorize payment on anything above 100% of budget until mid-January.

In mid-January, when we have the year-end spend files from the RA group, we will sit down to look at our overall portfolio level spend and then coordinate which payments should be authorized in order to maximize savings and avoid overspending. [REDACTED] or [REDACTED] will be scheduling these meetings.

A couple of notes:

- [REDACTED] & [REDACTED] spoke yesterday regarding C&I. We need the sector to remain as close to 100% of spend as possible. All invoices should be paid up to 100% of spend.
- In speaking with [REDACTED] regarding low income sector (Single Family and Multi Family), that sector is projecting approx 85% savings, and all invoices should be paid in a best effort to increase the year end sector level savings. All invoices should be paid up to 100% of spend.
- The resi sector is currently at 109% of savings (as of two days ago) and 103% of spend (through Nov.). In speaking with [REDACTED] & [REDACTED] we most closely need to monitor HVAC and EnergyWise invoices as they have the momentum to overspend. We are submitting the budget notification for EnergyWise to be \$650k overspent and HVAC to be \$500k overspent. Please do not authorize any payments above those amounts until we can evaluate the situation in January.

Attached is a preliminary quarterly report with savings through 12/18 and spend through 11/31. All updated cells are highlighted green. We have been using this since the scorecard is not ready yet.

Please let us know if you have questions!

Thanks,

[REDACTED]

~~~~~  
[REDACTED]

REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Wed 1/13/2016 11:14:43 PM (UTC)  
Subject: Re: RI 2015 Resi and Low Income Shareholder Incentive close to maxed out

No do not pay them

Sent from my iPhone

On Jan 13, 2016, at 5:49 PM, "[REDACTED]" wrote:

Hi  
So does this mean I do not pay the accruals that are due by Friday?  
I just logged in to do this.  
Let me know

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Energy Efficiency – Its not a Capital Expense, it's Cost Avoidance

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2016 4:12 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: RI 2015 Resi and Low Income Shareholder Incentive close to maxed out  
**Importance:** High

RI Resi Electric team - Do any of you have any resi/low income invoices that have not been paid yet for 2015? If so, please DO NOT pay until next week. Concern is we will go over the max achievable PI.

[REDACTED] I'll address C&I separately...

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2016 3:32 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RI 2015 Resi and Low Income Shareholder Incentive close to maxed out  
**Importance:** High

Would like your advice on how to proceed. The resi electric and low income electric shareholder incentive has maxed out at 125% based on spend and savings (details below). I'd like to recommend that anything accrued and not already paid be delayed until later in January and counted to 2016. This would only be for residential and low income programs. C&I needs to pay everything accrued, PI is only at 103%.

Based on the latest allocated spend file (doesn't include accruals) and today's sum by month (doesn't include accruals which aren't backdated):

- The residential PI is at 124%; RI can only collect up to 125%
- the residential electric sector is at 94.4% spend
- This is called the "bonus" because spend <95% -- that could easily tip over to "non-bonus"
- In "bonus" savings are at 125%
- Note, the spend file doesn't reflect what of the December accruals has been paid to date but the sum by month does (per [REDACTED] so spend could easily be higher and in "non-bonus" (see below)
- the savings doesn't reflect OPower Dec savings which entered around the 20<sup>th</sup> of each month, estimated as 4,000 MWh
- Even if resi spend goes over 95%, e.g. out of bonus, with the OPower Dec savings, the shareholder incentive will be at 122%
- Low Income PI is at 121%; spend at 91% and savings are at 119%

Another reason it may be good to start 2016 with savings is that Multifamily electric and gas programs will likely have fewer savings than planned as process and calculation changes are implemented in both RI & MA as a result of the RI evaluation. This is all still evolving, but it's pretty likely.

I have not looked at gas. Attached is the latest performance incentive prediction based on YTD spend and Sum By Month.

<< File: Preliminary RI Shareholder Incentive 20160104.xlsx >>

-- [REDACTED]

[REDACTED]



To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Fri 12/11/2015 4:31:21 PM (UTC)  
Subject: RE: Goal setting - #falloutrate

So for the next analysis regarding the budget, and I better to pay everything we can this year or better to hold some for next year. Once we achieve 105% of LCI goal ( like that positive thinking), which year's budget can handle the paid units better.

---

From: [REDACTED]  
Sent: Thursday, December 10, 2015 2:19 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Goal setting - #falloutrate

Hey all,  
I spoke to [REDACTED] about this earlier and then got this request from [REDACTED] including everyone because it bears on everyone. I expect there will be questions; we'll talk.

Basically, the question we're trying to answer is: **where do we set the sales goal such that we account both for the fallout of projects at year-end as well as for the carried projects that we start the year with?** This is especially important in RI, where the goal is a bit reduced and historically has been met or exceeded.

#### The approach is to look at this as two pieces:

- New projects that are sold in the year:
  - In order to address new projects, I'm dividing the savings from projects that were sold and paid in the same year by the total savings sold in order to get what I'm calling the "in-year realization rate". The remainder of these projects presumably were either cancelled or pushed out to be paid in future years.
- Carry-over projects sold in previous years
  - In order to address carry-over, I'm looking at the residual savings in a given year that we claimed but were sold in a previous year--this is what I'm calling "PrevYrSav." However, this does not include projects that were sold in previous years, were carried over, but were not not claimed, either because they were cancelled or because they were pushed through to a future year. By going back to the pipeline files I have from early February of 2014 and 2015, I've looked at the sold savings that we began the year with ("sold inventory") and have divided that by the "PrevYrSav" value to get the "Carried realization rate."
  - Unfortunately, because I only have pipeline data for the last two years, I only have this for 2014 and 2015.
- Once the activity has sorted itself out in January, we'll know where we stand and will have a much better idea of what the sales goals need to be for the FY17 sales year.
  - However, I suspect there's a desire to nail down goals before then...SO,
- It's probably safe to assume that ~75% of whatever's sold in a given year will be paid in that year.
- As far as what will happen with projects carried into next year, it's a little early to say.
- Upstream savings and CHP projects are excluded from this analysis. Also, nothing is weighted.

|            | RI            | 2012   | 2013   | 2014   | 2015   |
|------------|---------------|--------|--------|--------|--------|
|            | Total claimed | 44,179 | 43,797 | 52,436 | 42,850 |
| In year    | Sold&paid     | 42,051 | 34,824 | 44,491 | 30,566 |
|            | Sold          | 50,235 | 44,084 | 60,299 | 54,944 |
|            | In-year RR    | 84%    | 79%    | 74%    | 56%    |
| Carry over | PrevYrSav     | 2,128  | 8,974  | 7,945  | 12,284 |
|            | Sold inven    | n/a    | n/a    | 19,326 | 14,140 |
|            | Carried RR    |        |        | 41%    | 87%    |

|            | MA            | 2012      | 2013      | 2014      | 2015      |
|------------|---------------|-----------|-----------|-----------|-----------|
|            | Total claimed | 1,795,317 | 1,948,967 | 2,169,415 | 1,593,980 |
| In year    | Sold&paid     | 1,633,752 | 1,600,085 | 1,636,954 | 1,134,639 |
|            | Sold          | 2,080,765 | 2,142,428 | 2,258,293 | 2,427,286 |
|            | In-year RR    | 79%       | 75%       | 72%       | 47%       |
| Carry over | PrevYrSav     | 161,565   | 348,882   | 532,462   | 459,341   |
|            | Sold inven    | n/a       | n/a       | 696,099   | 750,326   |
|            | Carried RR    |           |           | 76%       | 61%       |

**From:** [REDACTED]  
**Sent:** Wednesday, December 09, 2015 4:37 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Goal setting - #falloutrate

Sounds like it would work. Let's talk tomorrow

Sent from my iPhone  
On Dec 9, 2015, at 4:21 PM, [REDACTED] wrote:

Hey [REDACTED]  
Sure: the 2016 pipeline is pretty straightforward. As of Monday, the pipeline for 2016 was about 13,500 (about 12,500 for your folks and a little more than 1,000 for [REDACTED] people. That number will go up a little as more projects come into the system and as some are pushed to next year.

The fallout rate is more tricky: I need to have a starting point and ending point in order to determine the rate for that period... For example, the fallout rate is likely negative in the early part of the year; it's very high in Oct-Nov.

One thing that might makes sense is to look at projects sold and paid in 2015, divided by those sold in 2015...that would give you something like an in-year realization rate. It wouldn't necessarily provide the entire picture--projects sold in previous years but paid in 2015, but by looking at that separately, we might be able to get close. Does that sound like it might work?

**From:** [REDACTED]  
**Sent:** Wednesday, December 09, 2015 3:42 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Goal setting - #falloutrate

[REDACTED]  
Next year with lower goals and budgets, there is concern that I could over goal. Can you do a little a research and let me know what our fall out rate is? I am trying to figure out, if I goal 43,000 and sell 48,000 it will result in xxxx sold.

2016 pipeline would also be helpful.



REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Tue 11/8/2016 5:25:31 PM (UTC)  
Subject: Re: Top 20 year end strategy

We aim to please

Sent from my iPhone

On Nov 8, 2016, at 12:14 PM, [REDACTED] wrote:

Ok deal. I can work with that.

[REDACTED]

[nationalgrid](#)

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**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 12:13 PM  
**To:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

It is a lot, I imagine most are with [REDACTED] So I would increase to 50 units or whatever provides a reasonable number. Then when we sit with [REDACTED] on Thursday we just walk through those jobs asking which one can be pushed out to 2017 and try to reduce your list like that.

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 12:04 PM  
**To:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

Still quite a bit at 96 jobs. And you're talking only for 2 pal.

[REDACTED]

[nationalgrid](#)

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 12:01 PM  
**To:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

Ok – so let's think, if we do not look at any apps under 25 units, how much does that narrow you list ?

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 12:00 PM  
**To:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

Well the entire list is only for jobs through YE so there has to be a line drawn somewhere otherwise you are talking 158 apps for my reps alone.

[REDACTED]

**nationalgrid**

**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 11:58 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

And will also be looking at December projects to determine which will be ready to pay as well.

**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 11:56 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

Just to clarify after speaking with [REDACTED] & [REDACTED] last week.

We are looking at every job with a completion date of this month regardless of size to determine if we can truly pay it this month, correct?

Thank you!

**nationalgrid**

**From:** [REDACTED]  
**Sent:** Tuesday, November 08, 2016 11:19 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Top 20 year end strategy

Good Morning,

Here is the latest Top 20 list. Since I gave it by months on Friday, this list is by Account rep, pipeline status and MWh reduction largest to smallest.

Let me know if this works and if not I can slice & dice as needed.

I have hi-lighted in Red the projects that are have greater than 500 aMWh reduction. We will also need to watch commissioning payments.

This will be the list we use on Thursday.

Any questions please let me know.

Thank you,

**From:** [REDACTED]  
**Sent:** Friday, November 04, 2016 11:10 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Top 20 year end strategy

Good Morning Everyone,

I ran this Top 20 list for Strategic from 11/3/16 information. It is sorted by expected completion month.

If you want to get a head start. I expect to have the latest Top 20 available late on Monday or Tuesday morning.

[REDACTED]: Just and FYI since I already sent out information for your team

Please let me know if you have any questions.

Thank you,

---

**From:** [REDACTED]  
**Sent:** Friday, November 04, 2016 8:49 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Top 20 year end strategy

Team,

Our goal is to finish the LCI EE year at 105% of our savings goal and 95% of our budget, this will allow us to achieve 110.5% of our shareholder incentive . An excellent year ! In order to accomplish this task, we really need to manage our payments from now until the end of the year. Therefore next week's top 20 will have a slightly different focus. Our goal at the top 20 will be determine which November projects will definitely be paid in November and which December projects can be pushed to 2017. This is a very fluid process, so once the top 20 is updated we will revisit our projections and decide the next steps.

Monday afternoon, [REDACTED] will be sending out the top 20 report, sorted by expected payment date, so as you prepare for the top 20, please keep the new parameters set above in mind. At the top 20 meeting, the sales reps input on what December projects can be pushed to 2017 without too much disruption to the customer will be very important.

This is an internal strategy. Please do not share, with PEX, TA vendors , customers etc. If you have any questions or concerns, please let me know.

REDACTED

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 12/1/2016 4:47:11 PM (UTC)  
**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS

[REDACTED]  
No worries. We will be here in standby mode!

Regards,  
[REDACTED]  
[www.RISEngineering.com](http://www.RISEngineering.com)

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 11:46 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS  
**Importance:** High

Hold everything.....just got another email. We may be okay with the 2% but I have to wait to hear back for confirmation. Sheesh, wish they would make up their minds....Thanks

[REDACTED]  
National Grid  
939 Southbridge St  
Worcester, MA 01610  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 11:35 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || RE: 2016 Final Savings for Rhode Island SBS

Hi [REDACTED]

Looks like there is a strategy meeting going on in RI today and they are now telling me that they do not want me to exceed the 100% of goal and if possible to underspend doing it. I think we are okay there, but that would mean holding back on some projects on invoicing until after January 12<sup>th</sup> so that we can have them included in 2017 savings goal and spend.

Let me give you a call to discuss.

Thanks,

[REDACTED]  
National Grid  
939 Southbridge St  
Worcester, MA 01610  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, December 01, 2016 11:21 AM



To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXT || RE: 2016 Final Savings for Rhode Island SBS

[REDACTED]  
We are managing to utilize the entire N Grid contribution budget of \$6,625,000 to exceed the 12,165 Net MWh goal by about 2%.

As of this morning, we were are tracking ~\$16,000 of incentive monies left to be utilized to capture an annual savings number near 12,400 Net MWh.

Anything beyond this that is currently in the started, scheduled or signed stages will be booked for 2017.

I am at my desk all day today and tomorrow if it's easier to talk through these final numbers.

Regards,  
[REDACTED]  
[REDACTED] | [www.RISEngineering.com](http://www.RISEngineering.com)

---

From: [REDACTED]  
Sent: Thursday, December 01, 2016 10:21 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: 2016 Final Savings for Rhode Island SBS

Hi [REDACTED]

At this time, I have RISE at 12072 Net MWh, just shy of the 12165 goal. The most recent report I pulled I have projects in following status'. I was hoping you would be able to tell me of these, which ones do you think will be completed and invoiced by the December 16<sup>th</sup> date. I am trying to obtain a final % of goal and spend that the program will come in at.

I also want to mention that once invoicing is completed, we do not want to have any projects in or moved into the installation completed status after the 16<sup>th</sup> date, as this will accrue the monies/savings for these projects for 2016 spend/budget. Please let me know if you have any questions on this.

| Vendor                 | Status                 | Data                 |               |                |
|------------------------|------------------------|----------------------|---------------|----------------|
|                        |                        | Sum of NGrid Contrib | Sum of Net KW | Sum of Net MWH |
| RISE ENGINEERIN        | Contract Signed        | 2038.05              | 0.76081       | 4.30784979     |
|                        | Installation Scheduled | 479020.34            | 201.06141     | 1258.025912    |
|                        | Installation Started   | 200655.49            | 65.41849      | 476.1871074    |
|                        | Paid                   | 6487420.5            | 2231.42012    | 12071.59666    |
| RISE ENGINEERING Total |                        | 7169134.38           | 2498.66083    | 13810.11753    |
| Grand Total            |                        | 7169134.38           | 2498.66083    | 13810.11753    |

[REDACTED]  
National Grid  
939 Southbridge St  
Worcester, MA 01610

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| To: [REDACTED] | Message Score: 40                      | High (60): <b>Pass</b>   |
| [REDACTED]     | My Spam Blocking Level: Custom         | Medium (75): <b>Pass</b> |
|                |                                        | Low (90): <b>Pass</b>    |
|                | <a href="#">Block</a> this sender      | Custom (65): <b>Pass</b> |
|                | <a href="#">Block</a> nationalgrid.com |                          |

*This message was delivered because the content filter score did not exceed your filter level.*

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 12/20/2016 8:05:28 PM (UTC)  
**Subject:** FW: savings info as of today

FYI

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 20, 2016 2:15 PM  
**To:** [REDACTED]  
**Subject:** savings info as of today

RI MF elec - 3810 Annual MWh or 94%

RI MF IE elec - 3161 Annual MWh or 112% (FINAL - I am holding numerous invoices)

RI MF Gas - 115,444 Annual Therms or 67%

RI MF IE Gas - 148,358 Annual Therms or 74%

RI MF Comm Gas - 116,125 Annual Therms or 122% (FINAL - I am holding an invoice)

[REDACTED]  
[REDACTED]  
[nationalgrid | Waltham, MA](#)  
[REDACTED]

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 1/3/2017 6:00:50 PM (UTC)  
**Subject:** RE: RI Upstream lighting invoice

Yes. We are presently at 105.4%.

Also, [REDACTED] we have 2 applications pending and set to be released tonight in the payment release queue.

Let's hold them and the ones you have been tracking on your shared drive not yet processed until the 16<sup>th</sup>.

Thank you,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 03, 2017 12:57 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RI Upstream lighting invoice

Hi [REDACTED] please don't pay the December RI Upstream Ecova Invoice until on or after January 16<sup>th</sup>. We are currently at 105% paid in RI Electric C&I. In addition, If there are Upstream HVAC invoices not yet paid, please don't pay those either. [REDACTED] please confirm we are officially at our sweet spot of 105% paid.

Thanks,

[REDACTED]

[REDACTED]

Please consider the environment before printing this email.

To: [REDACTED]  
From: [REDACTED]

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-4-10 (Redacted)  
Page 1 of 1

Sent: Fri 5/31/2019 7:41:11 AM (UTC)  
Subject: RE: RI Residential/low income year end results

Hi [REDACTED]

The yearend spending should be the same as forecasted or even little lower for New construction gas and electric programs. However for Cool smart , the spending will exceed the forecasts

---

From: [REDACTED]  
Sent: Thursday, November 03, 2016 4:39 PM  
To: [REDACTED]  
Subject: RI Residential/low income year end results

Hi team, just had call with [REDACTED] and the RI policy team on our year end forecasts. I wanted to communicate that we can't go above the current forecasts in the Residential sector. According to [REDACTED] our sweet spot to hit is 95% of spend and 105% of savings at year end. If we over achieve beyond this savings result, it will cause regulatory/ stakeholder issues for the Policy team and 2017-18 goals could significantly increase for us.

So, last scorecard shows that EnergyWise and Lighting are driving the 109% of the resi sector forecast. (which by the way is an awesome problem to have!!!)

I think the first place I would like to focus on is with EnergyWise. [REDACTED] we can discuss what we can do to lower your year end result and if that is possible. We may have to find out what invoices we can hold, or offer audits and not complete jobs in December.

For everyone else, I will follow up if we need further discussion. Again, I can't have anyone achieve higher than what you have said you would in the September scorecard. If you will, I need to k now that as soon as possible.

Low Income in good shape, no issues here.

Gas forecasts and spend are in great shape! If you are going to exceed last month's scorecard forecast, please let me know right away.

We are well on our way to closing out another great year everyone! Thanks in advance for your cooperation.

If you would like a call about this, please let me know.

[REDACTED]

Please consider the environment before printing this email.

REDACTED

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 12/20/2016 4:43:07 PM (UTC)  
**Subject:** RE: RI invoices

I believe it was in our forecast – but can hold them if need be as I know the budget is going over.

[REDACTED]

 Please consider the environment before printing this email

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 20, 2016 10:13 AM  
**To:** [REDACTED]  
**Subject:** RE: RI invoices

If this amount is not in your budget forecast, I can take a look at what paying these does to the overall budget for RI resi. I'll get back with you as soon as I can

---

**From:** [REDACTED]  
**Sent:** Monday, December 19, 2016 2:39 PM  
**To:** [REDACTED]  
**Subject:** RI invoices

Hi [REDACTED]  
sorry to bother you – question for you.

Lockheed Martin invoice for Rhode Island program implementation costs - \$46,747.13 total  
Split \$31,320.58 – Lighting / \$15,426.55 – Product

Should I hold that until 2017 as well, or is that ok to pay? This is for November activities.  
Please advise, when you can.

Thank you

[REDACTED]

 Please consider the environment before printing this email

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Fri 12/2/2016 2:44:14 PM (UTC)  
**Subject:** RE: NE EE Gas Portfolios - update 12/30/2016

Great, thanks!

---

**From:** [REDACTED]  
**Sent:** Friday, December 02, 2016 9:10 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: NE EE Gas Portfolios - update 12/30/2016

Yes, our plan will be to hold back any gas payments to be at the requested 105% savings for all sectors. I am comfortable with the rigor around monitoring the LCI pipeline. We have been meeting weekly on Electric and we will discuss gas at next meeting (held on Thursdays)

---

**From:** [REDACTED]  
**Sent:** Friday, December 02, 2016 9:00 AM  
**To:** [REDACTED]  
**Subject:** RE: NE EE Gas Portfolios - update 12/30/2016

It looks like C&I Gas is now looking to hit 119% of goal. Given our discussions on wanting to keep closer to 105% this year is there anything we can do to move some of these savings to 2017?

Thanks,  
 [REDACTED]

---

**From:** [REDACTED]  
**Subject:** NE EE Gas Portfolios - update 12/30/2016

Good morning,  
 Here's today's update on the MA and RI gas portfolios. If you would like to be removed from the distribution list, please let me know.

Below are the current dashboards for claimed savings and year-end forecasts. The change from 11/28/16 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.

Substantive changes to note:

- MA Claimed savings - Accrual Period - no change except for slight savings move from Prescriptive-No Rep to Sales.
- MA Forecasted savings - 2016 total forecasted savings remains at 115% with only slight fluctuations in sales pipelines.
- RI Claimed savings - Accrual Period - no change
- RI Forecasted savings - C&I total forecast increased by 12.8% to 119% due to a considerable increase in Strategic Sales' pipeline. Resi-LI and Resi have not changed their forecasts.

Quantity of C&I Custom Apps left to pay:

- MA Upper pipeline - 188 (-15 since Monday)
- RI Upper pipeline - 46 (+1 since Monday)

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate. If you believe something is in error, please contact your friendly program manager.

Thanks, [REDACTED]

12/30/16

REDACTED

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-4-12 (Redacted)  
Page 2 of 2

| Massachusetts       | Savings to date and year-end forecast |             |       |       |            |            |             |        |       |
|---------------------|---------------------------------------|-------------|-------|-------|------------|------------|-------------|--------|-------|
|                     | NLT Goal                              | Paid        | P(%G) | Δ     | Pipeline   | Projection | Forecast    | F (%G) | Δ     |
| Sales               | 47,490,838                            | 45,514,479  | 96%   | 0.0%  | 37,204,956 | 859,146    | 83,578,581  | 176%   | 0.8%  |
| Strategic           | 40,000,000                            | 39,556,271  | 99%   | 0.0%  | 34,674,511 |            | 74,230,782  | 186%   | 0.8%  |
| North               | 22,000,000                            | 15,926,863  | 72%   | 0.0%  | 21,289,428 |            | 37,216,291  | 169%   | 1.2%  |
| South               | 18,000,000                            | 23,629,408  | 131%  | 0.0%  | 13,385,084 |            | 37,014,491  | 206%   | 0.4%  |
| Channel             | 7,490,838                             | 5,958,208   | 80%   | 0.3%  | 2,530,445  |            | 8,488,653   | 113%   | 0.4%  |
| Upstream            | 4,439,655                             | 10,259,791  | 231%  | 0.0%  |            | 2,050,161  | 12,309,952  | 277%   | 0.0%  |
| Prescriptive/no Rep | 11,000,000                            | 3,835,394   | 35%   | -0.2% |            | 195,935    | 4,031,329   | 37%    | -0.2% |
| LCI                 | 62,930,493                            | 59,609,663  | 95%   | 0.0%  | 37,204,956 | 3,105,242  | 99,919,861  | 159%   | 0.5%  |
| Multi Family HR     | 8,000,000                             | 482,943     | 6%    | 0.0%  |            | 4,635,382  | 5,118,325   | 64%    | 0.0%  |
| Multi Family Retro  | 3,234,567                             | 2,349,800   | 73%   | 0.0%  |            | 431,928    | 2,781,728   | 86%    | 0.0%  |
| SBS/DI              | 1,021,466                             | 373,226     | 37%   | 0.0%  |            | 137,507    | 510,733     | 50%    | 0.0%  |
| C&I                 | 75,186,526                            | 62,815,632  | 84%   | 0.0%  | 37,204,956 | 8,310,060  | 108,330,647 | 144%   | 0.4%  |
| Resi - LI           | 24,472,280                            | 13,046,449  | 53%   | 0.0%  |            | 8,186,351  | 21,232,800  | 87%    | 0.0%  |
| Resi                | 100,675,764                           | 83,098,777  | 83%   | 0.0%  |            | 15,113,081 | 98,211,858  | 98%    | 0.0%  |
| 2016 Total          | 200,334,570                           | 158,960,858 | 79%   | 0.0%  | 37,204,956 | 31,609,492 | 227,775,305 | 114%   | 0.2%  |
| 3-year total        | 605,706,542                           | 158,960,858 | 26%   | 0.0%  |            |            | 227,775,305 | 38%    | 0.1%  |

Filed NLT Goal  
72,208,476

24,472,280

100,675,764

197,356,520

605,706,542

| Rhode Island        | Savings to date and year-end forecast |           |       |      |          |             |           |        |       |
|---------------------|---------------------------------------|-----------|-------|------|----------|-------------|-----------|--------|-------|
|                     | AnTh Goal                             | Paid      | P(%G) | Δ    | Pipeline | Projection* | Forecast  | F (%G) | Δ     |
| Sales               | 1,663,372                             | 1,020,683 | 61%   | 0.0% | 758,813  | 150,000     | 1,929,497 | 116%   | 14.5% |
| Strategic           | 1,571,372                             | 965,054   | 61%   | 0.0% | 746,907  | 150,000     | 1,861,961 | 118%   | 15.4% |
| Channel             | 92,000                                | 55,630    | 60%   | 0.0% | 11,906   |             | 67,536    | 73%    | -0.5% |
| Prescriptive/no Rep | 30,000                                | 32,110    | 107%  | 0.0% | -        | 1,905       | 34,016    | 113%   | -0.1% |
| Upstream            | 27,000                                | 48,305    | 179%  | 0.0% |          | 59,535      | 107,840   | 399%   | 0.0%  |
| Codes & BOC         | 50,000                                | -         | 0%    | 0.0% |          | 52,005      | 52,005    | 104%   | 4.0%  |
| LCI                 | 1,770,372                             | 1,101,099 | 62%   | 0.0% | 758,813  | 263,445     | 2,123,357 | 120%   | 13.7% |
| C&I Multi Family    | 94,897                                | 88,545    | 93%   | 0.0% |          | 9,199       | 97,744    | 103%   | 0.0%  |
| SBS/DI              | 36,672                                | 43,987    | 120%  | 0.0% |          | -           | 43,987    | 120%   | 0.0%  |
| C&I Total           | 1,901,941                             | 1,233,630 | 65%   | 0.0% | 758,813  | 272,644     | 2,265,088 | 119%   | 12.8% |
| Resi-LI             | 292,825                               | 224,015   | 77%   | 0.0% |          | 69,735      | 293,750   | 100%   | 0.0%  |
| Resi                | 1,762,839                             | 1,362,879 | 77%   | 0.0% |          | 422,421     | 1,785,300 | 101%   | 0.0%  |





To: [REDACTED]  
 Cc: [REDACTED]  
 From: [REDACTED]

Sent: Mon 12/5/2016 4:02:51 PM (UTC)  
 Subject: Upstream Gas for remainder of 2016

Hi [REDACTED] we've been asked to manage to 105% of the C&I Gas portfolio as well. I see you have January thru October uploaded to InDemand which accounts for your 48,305 paid savings. When do you think you will have November in? And, could you hold off on uploading December until 2017 (any time after January 13, 2016) if necessary?

We'll talk more on Thursday but I wanted to give you a heads up that this may be asked of you.

| Rhode Island         | Savings to date and year-end forecast |                  |            |             |                |                  |                  |             |               |
|----------------------|---------------------------------------|------------------|------------|-------------|----------------|------------------|------------------|-------------|---------------|
|                      | AnTh Goal                             | Paid             | P(%G)      | Δ           | Pipeline       | Projection*      | Forecast         | F (%G)      | Δ             |
| <b>Sales</b>         | <b>1,663,372</b>                      | <b>1,039,840</b> | <b>63%</b> | <b>1.2%</b> | <b>758,352</b> | <b>(136,744)</b> | <b>1,661,447</b> | <b>100%</b> | <b>-16.1%</b> |
| Strategic            | 1,571,372                             | 983,153          | 63%        | 1.2%        | 747,502        |                  | 1,730,655        | 110%        | -8.4%         |
| Channel              | 92,000                                | 56,686           | 62%        | 1.1%        | 10,850         |                  | 67,536           | 73%         | 0.0%          |
| Prescriptive/no Rep  | 30,000                                | 32,110           | 107%       | 0.7%        | -              | 1,905            | 34,016           | 113%        | 0.0%          |
| Upstream             | 27,000                                | 48,305           | 179%       | 0.0%        |                | 59,535           | 107,840          | 399%        | 0.0%          |
| Codes & BOC          | 50,000                                | -                | 0%         | 0.0%        |                | 52,005           | 52,005           | 104%        | 0.0%          |
| <b>LCI</b>           | <b>1,770,372</b>                      | <b>1,120,255</b> | <b>63%</b> | <b>1.1%</b> | <b>758,352</b> | <b>(23,299)</b>  | <b>1,855,307</b> | <b>105%</b> | <b>-15.1%</b> |
| C&I Multi Family     | 94,897                                | 88,545           | 93%        | 0.0%        |                | 9,199            | 97,744           | 103%        | 0.0%          |
| SBS/DI               | 36,672                                | 43,987           | 120%       | 0.0%        |                | -                | 43,987           | 120%        | 0.0%          |
| <b>C&amp;I Total</b> | <b>1,901,941</b>                      | <b>1,252,786</b> | <b>66%</b> | <b>1.0%</b> | <b>758,352</b> | <b>(14,100)</b>  | <b>1,997,038</b> | <b>105%</b> | <b>-14.1%</b> |
| Resi-LI              | 292,825                               | 224,015          | 77%        | 0.0%        |                | 69,735           | 293,750          | 100%        | 0.0%          |
| Resi                 | 1,762,839                             | 1,368,143        | 78%        | 0.3%        |                | 417,157          | 1,785,300        | 101%        | 0.0%          |

[REDACTED]

To: [REDACTED]  
From: [REDACTED]

Sent: Fri 5/31/2019 7:46:48 AM (UTC)  
Subject: RE: RNC & HVAC savings forecast for RI

Hi [REDACTED]  
The RNC Electric budget is already at 101% , unfortunately the scorecard doesn't reflect the savings for C&S , since there is no monthly tracking for it yet. The spending will be within budget at 100% as well .

**RNC Electric:**

|             |       |       |      |
|-------------|-------|-------|------|
| New Con     | 569   | 561   | 101% |
| C & S (54%) | 650   | 650   |      |
| Total       | 1,219 | 1,211 | 101% |

**RNC Gas:**

|             |        |         |     |
|-------------|--------|---------|-----|
| New Cons    | 34,632 | 47,419  | 73% |
| C & S (57%) | 61,648 | 61,648  |     |
| Total       | 96,280 | 109,067 | 88% |

The gas program spending would exceed 1-3% if allowed, but any event the savings are to exceed 100% when November invoice is paid.

**HVAC Electric:**

From: [REDACTED]  
Sent: Tuesday, November 22, 2016 4:37 PM  
To: [REDACTED]  
Subject: RNC & HVAC savings forecast for RI

Hi there, I'd like to sit with the two of you next week to discuss whether or not you will meet the RNC & HVAC forecasts between now and December. The paid savings in October for RNC are only at 43% of goal. Are we going to bring in over 700 units in Nov/Dec? HVAC at 86% Do we still expect to overachieve?

I'm trying to see ways to balance the overall residential sector to 105% of savings, per [REDACTED] direction. The resi sector forecast is currently at 111%. So I'm looking at each program to see if there's any opportunity to hold back invoices or strategies to stay at around 100% instead of overachieving.

[REDACTED] could you set up a meeting for the 3 of us Monday or Tuesday next week. I'm available after 2:30 on Tuesday.

**RNC**

|       |                         |           |          |                    |
|-------|-------------------------|-----------|----------|--------------------|
| Goal  | Savings claimed to date | % to goal | Forecast | % to goal forecast |
| 1,213 | 525                     | 43%       | 1,315    | 108%               |

**HVAC**

|       |     |     |       |      |
|-------|-----|-----|-------|------|
| 1,011 | 867 | 86% | 1,163 | 115% |
|-------|-----|-----|-------|------|

REDACTED

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-4-14 (Redacted)  
Page 2 of 2

Please consider the environment before printing this email.

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 1/11/2018 3:37:11 PM (UTC)  
**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018

Hi [REDACTED]  
RNC & HVAC Electric invoices are pushed to fiscal year 2018.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:35 AM  
**To:** [REDACTED]  
**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018

Hi [REDACTED]  
We are not processing any additional invoices for EW RI single family gas or electric for 2017. Anything remaining will be for 2018.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:32 AM  
**To:** [REDACTED]  
**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018

Hi All,  
Per [REDACTED] email, is there anything with savings attached that you all are still planning to pay out in Electric standard income in RI? It was my understanding that we were final there for this year.  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:15 AM  
**To:** [REDACTED]  
**Subject:** NE EE Electric 2017 Portfolios - update 1/11/2018

Good Morning,  
Below are the current dashboards for claimed savings and year-end forecasts for filed and stretch goals. The change from 1/4/2018 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.

Substantive changes to note:

- **RI Claimed savings** - 2017 total C&I Portfolio claimed savings presently at **111%**
- **RI Claimed savings** - Resi 116% and Resi-LI at 108% of their filed goal.
- **RI Forecasted savings** - The total 2017 C&I forecast at 111% of the filed goal.
- **RI Forecasted savings** Resi forecast 119% and Resi-LI forecast to 108%

Quantity of C&I Custom Apps left to pay:

- RI 2017 pipeline -0

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate.

If you have any questions please let me know.

Thank you,



| Savings to date and year-end stretch forecast |         |       |      |          |            |          |         |       |         |
|-----------------------------------------------|---------|-------|------|----------|------------|----------|---------|-------|---------|
| RI (AnMWh)                                    | Paid    | P(%G) | Δ    | Pipeline | Projection | Forecast | FC (%G) | Δ     | Goal    |
| Sales                                         | 80,358  | 117%  | 1.8% | 2,858    | (2,857)    | 80,358   | 117%    | -2.8% | 68,485  |
| Comm                                          | 63,451  | 108%  | 2.1% | 2,726    |            | 66,177   | 113%    | 0.0%  | 58,549  |
| Strat                                         | 43,374  | 115%  | 3.3% | 2,726    |            | 46,100   | 122%    | 0.0%  | 37,795  |
| CHP                                           | 11,131  | 106%  | 0%   | -        |            | 11,131   | 106%    | 0.0%  | 10,549  |
| StL                                           | 8,945   | 88%   | 0.0% | -        |            | 8,945    | 88%     | 0.0%  | 10,205  |
| Channel                                       | 16,907  | 170%  | 0.0% | 132      |            | 17,038   | 171%    | -0.7% | 9,936   |
| MedC&I                                        | 1,820   | 27%   | 0.0% | -        |            | 1,820    | 27%     | 0.0%  | 6,780   |
| Nat'l                                         | 15,086  | 478%  | 0.0% | 132      |            | 15,218   | 482%    | -2.3% | 3,156   |
| Upstream (Includes Lgts & HVAC)(pilot)        | 17,288  | 55%   | 0.0% |          | 12         | 17,299   | 55%     | 0.0%  | 31,321  |
| Codes&BOC                                     | 4,769   | 100%  | 0.0% |          | 0          | 4,769    | 100%    | 0.0%  | 4,769   |
| LCI                                           | 102,414 | 98%   | 1.2% | 2,858    | (2,845)    | 102,426  | 98%     | -1.8% | 104,575 |
| SBS                                           | 12,955  | 102%  | 0.0% |          | -          | 12,955   | 102%    | 1.7%  | 12,743  |
| C&I                                           | 115,369 | 98%   | 1.1% | 2,858    | (2,845)    | 115,381  | 98%     | -1.5% | 117,318 |
| Resi                                          | 104,818 | 111%  | 0.3% |          | 2,649      | 107,467  | 113%    | 0.0%  | 94,767  |
| LI                                            | 7,640   | 103%  | 1.9% |          | -          | 7,640    | 103%    | 1.4%  | 7,430   |



Please consider the environment before printing this email.

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 1/11/2018 3:53:54 PM (UTC)  
**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018

RI Resi gas heating will not be processing any additional workpackages for 2017. Vendor was advised to process invoices/workpackages on 1/16/18. Holiday on Monday!!

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:38 AM  
**To:** [REDACTED]

**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018  
I have one more MF Std elec invoice that I can pay or wait for 2018.  
Net Annual MWh is 4.03.  
Just let me know which is best...  
Thanks!

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:35 AM  
**To:** [REDACTED]

**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018  
Hi [REDACTED]  
We are not processing any additional invoices for EW RI single family gas or electric for 2017. Anything remaining will be for 2018.  
Thanks,

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:32 AM  
**To:** [REDACTED]

**Subject:** RE: NE EE Electric 2017 Portfolios - update 1/11/2018  
Hi All,  
Per [REDACTED] email, is there anything with savings attached that you all are still planning to pay out in Electric standard income in RI?  
It was my understanding that we were final there for this year.

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 10:15 AM  
**To:** [REDACTED]

**Subject:** NE EE Electric 2017 Portfolios - update 1/11/2018  
Good Morning,  
Below are the current dashboards for claimed savings and year-end forecasts for filed and stretch goals. The change from 1/4/2018 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.  
Substantive changes to note:

- RI Claimed savings - 2017 total C&I Portfolio claimed savings presently at **111%**
- RI Claimed savings - Resi 116% and Resi-LI at 108% of their filed goal.
- RI Forecasted savings - The total 2017 C&I forecast at 111% of the filed goal.
- RI Forecasted savings Resi forecast 119% and Resi-LI forecast to 108%

Quantity of C&I Custom Apps left to pay:  
• RI 2017 pipeline -0

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate.

If you have any questions please let me know.  
Thank you,

| Savings to date and year-end stretch forecast |         |       |      |          |            |          |         |       |         |
|-----------------------------------------------|---------|-------|------|----------|------------|----------|---------|-------|---------|
| RI (AnMWh)                                    | Paid    | P(%G) | Δ    | Pipeline | Projection | Forecast | FC (%G) | Δ     | Goal    |
| Sales                                         | 80,358  | 117%  | 1.8% | 2,858    | (2,857)    | 80,358   | 117%    | -2.8% | 68,485  |
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| Strat                                         | 43,374  | 115%  | 3.3% | 2,726    |            | 46,100   | 122%    | 0.0%  | 37,795  |
| CHP                                           | 11,131  | 106%  | 0%   | -        |            | 11,131   | 106%    | 0.0%  | 10,549  |
| StL                                           | 8,945   | 88%   | 0.0% | -        |            | 8,945    | 88%     | 0.0%  | 10,205  |
| Channel                                       | 16,907  | 170%  | 0.0% | 132      |            | 17,038   | 171%    | -0.7% | 9,936   |
| MedC&I                                        | 1,820   | 27%   | 0.0% | -        |            | 1,820    | 27%     | 0.0%  | 6,780   |
| Nat'l                                         | 15,086  | 478%  | 0.0% | 132      |            | 15,218   | 482%    | -2.3% | 3,156   |
| Upstream (Includes Lgts & HVAC)(pilot)        | 17,288  | 55%   | 0.0% |          | 12         | 17,299   | 55%     | 0.0%  | 31,321  |
| Codes&BOC                                     | 4,769   | 100%  | 0.0% |          | 0          | 4,769    | 100%    | 0.0%  | 4,769   |
| LCI                                           | 102,414 | 98%   | 1.2% | 2,858    | (2,845)    | 102,426  | 98%     | -1.8% | 104,575 |
| SBS                                           | 12,955  | 102%  | 0.0% |          | -          | 12,955   | 102%    | 1.7%  | 12,743  |
| C&I                                           | 115,369 | 98%   | 1.1% | 2,858    | (2,845)    | 115,381  | 98%     | -1.5% | 117,318 |
| Resi                                          | 104,818 | 111%  | 0.3% |          | 2,649      | 107,467  | 113%    | 0.0%  | 94,767  |
| LI                                            | 7,640   | 103%  | 1.9% |          | -          | 7,640    | 103%    | 1.4%  | 7,430   |

| RI (AnMWh) | Filed An MWh |
|------------|--------------|
| C&I        | 104,000      |
| Resi       | 90,000       |
| Resi - LI  | 7,000        |



Please consider the environment before printing this email.

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
Sent: Thur 11/2/2017 5:13:53 PM (UTC)  
Subject: RE: EXT || FW: RI Invoicing

Not a problem thanks you too!

---

From: [REDACTED]  
Sent: Thursday, November 02, 2017 12:44 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXTERNAL: RE: EXT || FW: RI Invoicing

Hi [REDACTED]  
They can submit by then – rumor is the deadline is sooner than expected for 2017 year end. I can hold them in our system until the January release, so they process in 2018. Many thanks for helping us with our budget change.

Enjoy the day

---

From: [REDACTED]  
Sent: Thursday, November 02, 2017 11:42 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXT || FW: RI Invoicing

Hi [REDACTED]  
If Greenlite submits their RI invoices for October and November on December 20<sup>th</sup> will that work or do you want them submitted later?

Thanks,

---

From: [REDACTED]  
Sent: Wednesday, November 01, 2017 12:15 PM  
To: [REDACTED] >  
Cc: [REDACTED]  
Subject: EXTERNAL: RE: RI Invoicing

Hi [REDACTED]  
Yes, we can hold off in submitting, to EFI, the NGRID RI invoices for October, November, and December sales. We plan to submit the October and November sales invoice by 12/20 and the December sales invoice by 1/20/17. Thanks.

[REDACTED]



---

From: [REDACTED]  
Sent: Wednesday, November 01, 2017 7:22 AM



To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: RI Invoicing

Hi [REDACTED]

Can you please confirm you are able to accommodate the request below for RI?

Thanks,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, October 19, 2017 10:13 AM  
To: [REDACTED]  
Subject: RI Invoicing  
Importance: High

Hi [REDACTED]

Thanks for the call this morning. As we discussed we're asking several lighting manufacturers who work with independents to hold off submitting their **National Grid RI invoices** (all programs) for the months of October, November and December until the end of this year (submit to EFI at the end of December, early January, submitting all months at once). This will allow National Grid to claim savings on these months towards next year's plan and reduce their spend in 2017. Please let me know if you are able to do this for all of your National Grid RI programs.

Thanks,

[REDACTED]

[REDACTED]

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For the registered information on the UK operating companies within the National Grid group please use the attached link: <http://www.nationalgrid.com/corporate/legal/registeredoffices.htm>

To: [REDACTED]  
From: [REDACTED]  
Sent: Tue 11/7/2017 10:08:18 PM (UTC)  
Subject: Re: forecast update for today

Yes -the score card due today.  
Class tomorrow in the am  
We can catch up in the pm  
Thanks!

Sent from my iPhone

On Nov 7, 2017, at 4:53 PM, [REDACTED] wrote:

Thanks, [REDACTED] What do you mean about the data online today? The scorecard? Or some data from EFI also?

Let's chat tomorrow if necessary

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 07, 2017 2:33 PM  
**To:** [REDACTED]  
**Subject:** forecast update for today

Hi [REDACTED]  
Just an FYI – here's what I put in for forecast updates today.

According to the data online today, RI is already at 100% of spend / with savings at 117%  
Depending on when the spend is through, we might be holding everything now in RI, if I'm not  
already over my budget. Trying to check with [REDACTED] now to verify what the spend date is  
through.

This is what I put in, but feel like RI savings will have to be adjusted to reflect reality of right now =  
117%  
As we are out of funds allocated.  
I'll let you know, soon as I know.  
Thanks,  
[REDACTED]

| Massachusetts | Savings | Spend |
|---------------|---------|-------|
| Products      | 100%    | 104%  |
| Lighting      | 95%     | 95%   |

| Rhode Island | Savings | Spend |
|--------------|---------|-------|
| Products     | 96%     | 100%  |
| Lighting     | 132%    | 100%  |

[REDACTED]

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 11/2/2017 7:55:53 PM (UTC)  
**Subject:** RE: EXT || RE: Hold all Custom Gas Payments in RI please

Hi [REDACTED]

Please push completed apps as far as you can without initiating the sales rep's "create payment" task. I think you can move to Post Inspection Complete status and then ask Phil not to complete his QA review task until we know we want to pay that app.

I'll set up some time for us to talk next week.  
Thanks so much!

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:58 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EXT || RE: Hold all Custom Gas Payments in RI please

Does URI and Lifespan NEED their checks this year?

Fred sent a note to his sales team to find out what must be paid this year.

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:36 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** EXT || RE: Hold all Custom Gas Payments in RI please

FYI

We've been pushing on the URI and Lifespan PG 6 may have an EOY payout.

URI Pipe Insulation (#1 Child – 85,242 and #2 – 68565) and Lifespan PG 6 (14,897 Therms).

RISE will hold on closing anything else in RI until we hear back.

Thanks,

Ken

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:29 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Hold all Custom Gas Payments in RI please

We need to pay the Brown SEMP.... I will ask the team what if anything else

---

**From:** [REDACTED]  
**Sent:** Thursday, November 02, 2017 12:27 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Hold all Custom Gas Payments in RI please  
**Importance:** High

I am working on figuring out how to maximize the shareholder incentive. Please do not pay anymore custom apps (including radiator traps).



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For the registered information on the UK operating companies within the National Grid group please use the attached link: <http://www.nationalgrid.com/corporate/legal/registeredoffices.htm>

To: [REDACTED]  
From: [REDACTED]

Sent: Thur 1/4/2018 10:19:07 PM (UTC)  
Subject: RE: Happy New Year!

Hi [REDACTED]  
My programs both gas and electric cannot add any additional savings , since my invoices are all pushed to 2018.

In addition, the final results are less than what have been forecasted in the last scorecard.

RNC Electric: Forecasted/Results: 1,390/1,396

RNC Gas: Forecasted/Results 127,250/116,562

HVAC Electric: Forecasts/Results 1,403/1,396

Please let me know if you have any additional question.

Thanks,  
[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 04, 2018 1:07 PM  
To: [REDACTED]  
Subject: RE: Happy New Year!

Hi All,

Circling back on this. I have not heard from everyone on any anticipated changes to our forecasts.

This is particularly critical in RI standard income, where our most recent forecasts had us close to tipping the scales into a negative shareholder incentive. Gas was forecasted at 123% and Electric at 119%. As you know, we cannot go over 125% of savings goal or we get penalized.

[REDACTED] has already let me know she has come in slightly higher than anticipated, so for those with outstanding invoices that will go well over your previous forecasts, let's chat before paying out.

As of this morning, RI Gas standard income is at 111% to goal paid, while RI Electric standard income is at 116% paid. Please let me know where you anticipate coming in at this point.

Thanks  
[REDACTED]

---

From: [REDACTED]  
Sent: Tuesday, January 02, 2018 9:39 AM  
To: [REDACTED]  
Subject: Happy New Year!

Hi All,

Thanks for all your work bringing in the last of 2017's savings. Any updates we should be aware of as a team in terms of forecasts changing?



**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 1/10/2018 4:13:47 PM (UTC)  
**Subject:** RE: Happy New Year!

My dear friend, please dismiss this email , blaming you for bringing in more savings.

Watch, as we are heading in the final year of 3 years plan, she will come back and thank you later around with invoices.

Nothing is wrong here. As everyone else we have time in 2018 to adjust collectively based on portfolio level rather than program level , which is typical in third year of plan.

In regard to forecasts you can do our best , but that is a difficult task . I don't receive a forecasts savings from my cooling equipment , but rather receive unit count and \$ value. It's ultimately a guessing game, I personally don't know how to make that better .

At am glad you are blamed for bringing in more savings rather missing savings .

Cheers, cheers & cheers

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 10, 2018 11:04 AM  
**To:** [REDACTED]  
**Subject:** FW: Happy New Year!

FYI

---

**From:** [REDACTED]  
**Sent:** Friday, January 05, 2018 5:14 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

I am disappointed that you did not coordinate with me as I requested and reminded multiple times, before paying out above your forecast, especially a 13% increase. I am also disheartened that the forecast was so inaccurate in the very last days of the year. I'd like you to put some thought into how we can work to get a better handle on our forecasting and controls for 2018. We can discuss at our next one on one.

We are extremely lucky that EW SF savings are coming in slightly under, so the MF invoices will not have a detrimental effect. As of this evening, the gas portfolio is at 122%, so yes, please hold any additional invoices from RISE.

Thanks

---

**From:** [REDACTED]  
**Sent:** Friday, January 05, 2018 5:04 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

RISE has a few more invoices to submit, but the info from the Sum By Month below is probably pretty much where we will end up. If you'd like me to not pay any MF gas invoices (because we came in higher than forecast), just let me know.

Thanks!

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 5:17 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

Thanks for getting back to me. I am unclear what you are telling me. I also understood your forecasts to be those you noted below. Are you telling me you will not be able deliver as forecasted below? What is your updated forecast?

Thanks

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 4:45 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi [REDACTED]

My forecast for RI MF Elec was 90% (3167 NAMWh). Today the SBM shows 76% (2671).

My forecast for RI MF Gas was 80% (92,144 NAT). Today the SMB shows 93% (106,618).

RISE has a few more RI invoices that they will be submitting. If you'd like, I won't pay them until 1/16. Just let me know.

Thanks!

---

**From:** [REDACTED]  
**Sent:** Thursday, January 04, 2018 1:07 PM  
**To:** [REDACTED]  
**Subject:** RE: Happy New Year!

Hi All,

Circling back on this. I have not heard from everyone on any anticipated changes to our forecasts.

This is particularly critical in RI standard income, where our most recent forecasts had us close to tipping the scales into negative shareholder incentive. Gas was forecasted at 123% and Electric at 119%. As you know, we cannot go over 125% of savings goal or we get penalized.

[REDACTED] has already let me know she has come in slightly higher than anticipated, so for those with outstanding invoices that will go well over your previous forecasts, let's chat before paying out.

As of this morning, RI Gas standard income is at 111% to goal paid, while RI Electric standard income is at 116% paid. Please let me know where you anticipate coming in at this point.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 02, 2018 9:39 AM  
**To:** [REDACTED]  
**Subject:** Happy New Year!

Hi All,

Welcome to 2018! I hope you all had a wonderful holiday and are back re-energized and refreshed for the new year.

Thanks for all your work bringing in the last of 2017's savings. Any updates we should be aware of as a team in terms of forecasts changing?

[REDACTED]

REDACTED

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-4-22 (Redacted)  
Page 1 of 4

To: [REDACTED]

Cc: [REDACTED]

From: [REDACTED]

Sent: Wed 12/26/2018 5:55:08 PM (UTC)

Subject: RE: EXT || 2019 Data File Changes

Hi [REDACTED]

This is [REDACTED] I am sorry if I am causing confusion here, but I just wanted to try and keep things simple. I could always just have a different "start date" after you send me the final invoice for small business in January for the \$50 December incentives. You won't be sending me another invoice until early February for January's recycling anyway and I can just have the rates changed by then. Or if you want all new codes, I can have the \$50 ones with an end date of 1/31/19 and new ones for the \$75 incentives created and implemented with a 1/1/19 date. Thoughts?

Thanks,

[REDACTED]

From: [REDACTED]

Sent: Wednesday, December 26, 2018 12:47 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: EXT || 2019 Data File Changes

Hi [REDACTED] – We will still need to be able to invoice RI Residential incentives at \$50 and RI Small Business incentives at \$25, as we are not submitting the November invoice until January. I will defer to [REDACTED] for the decision on the 2019 RI incentive amount.

Sincerely,

[REDACTED]

*Business Analyst*

ARCA Recycling, Inc.

175 Jackson Avenue North, Suite 102

Hopkins, MN 55343

Direct 952.930.1794

From: [REDACTED]

Sent: Wednesday, December 26, 2018 11:31 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: EXT || 2019 Data File Changes

**WARNING:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi [REDACTED]

Sorry, I am now noticing that the rebates are going from \$50>\$75 for MA and \$25>\$50 for RI, but these are the RESIDENTIAL incentives and not Small Business. I am going to step away from residential and let Elizabeth deal with making the necessary changes for her program when she is back in the office.

My concern is Small Business and the current incentive levels are \$50 for BOTH MA and RI so I want to make sure I get my program

straightened out with the correct increased incentives. I will increase my levels to \$75 in BOTH states. I currently have an email to our IT asking if we can just simply change the current ARCA data files for my program that have the incentive of \$50 to \$75. This seems like it would be the easiest way to go about this, but I want to make sure that will not cause confusion or problems on your end and if your IT can handle that change.

- 331 – Mass Save Nantucket Small Business (331\_UnitLegend)
- 332 – Mass Save Small Business (332\_UnitLegend)
- 357-2 – Rhode Island Small Business (357-2\_UnitLegend)

Also, please note that Small Business is NOT included in the recycling of dehumidifiers and I confirmed this with the other utilities. This is apparently a Residential program only.

Please let me know what you think about the change for small business.

Thanks,

[Redacted signature]

---

**From:** [Redacted]  
**Sent:** Wednesday, December 26, 2018 8:58 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: EXT || 2019 Data File Changes

Hi [Redacted] – All Mass/RI Save programs will begin accepting Dehumidifiers effective 1/1/2019. The recycling cost will be \$35 per unit and the incentive amount will be \$30.00. Limit is 2 per account per calendar year.

I have attached samples of the current unit data files. Please advise of any and all changes we need to make for the files to be accepted into the National Grid invoicing system, both in terms of adding a new unit type (Dehumidifiers) and the incentive changes (\$50>\$75 for Mass; \$25>\$50 for RI Residential):

- 329 – Mass Save Nantucket Residential (329\_UnitLegend)
- 330 – Mass Save Residential (330\_UnitLegend)
- 331 – Mass Save Nantucket Small Business (331\_UnitLegend)
- 332 – Mass Save Small Business (332\_UnitLegend)
- 357-1 – Rhode Island Residential (357-1\_UnitLegend)
- 357-2 – Rhode Island Small Business (357-2\_UnitLegend)

Sincerely,

[Redacted signature]

---

**From:** [Redacted]  
**Sent:** Wednesday, December 26, 2018 7:32 AM  
**To:** [Redacted]  
**Subject:** RE: EXT || 2019 Data File Changes

Good Morning [REDACTED]

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-4-22 (Redacted)  
Page 3 of 4

I am not sure I understand what you mean by Dehumidifier unit types. Are you still referring to refrigerators and if so, what kind of additional cost, if any, are we looking for in processing of these?

Would you also please send the current codes and their values that you are using for the residential and small business programs for both MA and RI so that we are all on the same page as we make the determination of what changes need to be made to accommodate the new rebate rates.

Thank you,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 26, 2018 8:21 AM  
**To:** [REDACTED]  
**Subject:** EXT || 2019 Data File Changes

Good morning! We are working on adding Dehumidifier unit types for all Save programs and need to know what changes you require for the data files. Can you please advise what we should use for the Type or MeasureCode?

Also, for Mass – do we need to make any other changes to accommodate the incentive increase or will your system automatically recognize the new price for Refrigerator & Freezer pickups starting 1/1/2019?

Thank you and have a great day!

Sincerely,

[REDACTED]

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The Narragansett Electric Company  
700 Water Street  
Providence, RI 02903  
RIPUC Docket No. 5189  
Attachment PUC 3-4-22 (Redacted)  
Page 4 of 4

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To: [REDACTED]

From: [REDACTED]

Sent: Fri 12/7/2018 3:35:50 PM (UTC)  
Subject: RE: EXT || RE: RI Lighting and Products Year End Plans Discussion

Thanks so much, [REDACTED]

For RI Lighting, would it be possible to invoice us for approximately \$515,000? (up to a maximum of \$525,000)

We can pay that for 2018.

Then, can you invoice us for the balance later?

We will continue to monitor the portfolio and see if there is any more we can pay in 2018.

Please provide a Tableau update as soon as you can.

Thanks!

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, December 06, 2018 2:11 PM  
To: [REDACTED]  
Subject: EXT || RE: RI Lighting and Products Year End Plans Discussion

Hello,  
Below are EFI's action items from yesterday's call as well as updates from today.

- EFI to provide a pending dollar amount for RI lighting invoices  
Update: \$1,232,528.91 pending as of this morning. Please let us know if it is OK for EFI to include this amount in the next closing scheduled for the week of 12/17
- EFI to provide an update on Tableau data issues  
Update: issue was escalated with our CIO and I can confirm that IT is actively working on it (i.e.: MOU name fields that were missing have already been corrected). I should have an update for you by COB tomorrow.
- EFI to provide confirmation if NULL values in data file affect reporting to the PAs  
Update: although we can confirm that EFI is up to date in releasing payment and that the NULL values in the check run field are a reporting issue, I cannot confirm that disregarding the field will provide accurate reporting. As mentioned above, IT is actively working on the NULL values and I should have an update for the group by COB tomorrow.

Thank you,  
[REDACTED]

[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, December 05, 2018 10:01 AM  
To: [REDACTED]  
Subject: RE: RI Lighting and Products Year End Plans Discussion



Hi all,

We have reviewed the portfolio.

We have determined that EFI should submit all lighting and products invoices. I will pay as many of them as I can. The rest will be accrued.

I look forward to discussing more at 11:00.

Thanks!

-----Original Appointment-----

**From:** [REDACTED]  
**Sent:** Wednesday, November 14, 2018 9:19 AM  
**To:** [REDACTED]  
**Subject:** RI Lighting and Products Year End Plans Discussion  
**When:** Wednesday, December 05, 2018 11:00 AM-11:30 AM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** [REDACTED]

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**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Thur 11/8/2018 1:27:51 PM (UTC)  
**Subject:** EXT || RE: RNC Spending

[REDACTED]

Quick question, do you have the total gas and electric goals, and where we are to goal for both? You included that info for C&S below and I was curious about New Con too.

The 200 units is mostly made up of three big projects – two all electric 45 unit projects, and one 84 unit gas project. I will run some analysis on those to see what the savings are.

Thanks.

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, November 7, 2018 8:27 AM  
**To:** [REDACTED]  
**Subject:** RE: RNC Spending

Hi [REDACTED]  
Trying to get some perspective for my acting manager on budget and savings....

If I recall on our previous communication Gas spend was projected to \$90K Electric at \$115K with a total of 200 units .

To digest the numbers, I would ask if you can give a breakdown

Gas/Elec in unit with associated savings to help determine how much to defer to next year

My own estimate is this

**Gas YTD Savings:** 21,794 Monthly average: 2,179.4 additional 2 months: 4,358.8

C&S: 9,558 total yearend: 37,890.2 which is 122% over goals of 31,170

Electric YTS: 415,430 Monthly average: 41,543 additional 2 months: 83,086

C&S: 167 total yearend: 706.629 which is 114% over goals of 619 MWH

Please give your perspective.

Thanks,  
[REDACTED]

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To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOLDIR]  
Sent: Wed 1/9/2019 10:36:46 PM (UTC)  
Subject: RE: accruals understated and 2018 charges

Hi [REDACTED] as of today, RIGas C&I is at 97% paid.

We were projecting another 7,609 from C&I MF...  
There was a pleasant surprise from [REDACTED] last night - 12 RIGas participants completed the course and applied for reimbursement.

Prescriptive-No Rep & Upstream/POS Gas work packages were paid today and expected to be backdated for tomorrow's sum by month's - I have no idea what the savings are until then though...

So, using best available information, and excluding any more savings from C&I MF, we should hit 103% of the C&I 2018 filed goal.

I will go out on a limb and say we are ok without the RIGas C&I MF savings that weren't accrued.

| Rhode Island            | Filed Goal | Paid 1/9         | P(%G)       |
|-------------------------|------------|------------------|-------------|
| C&I Total               | 2,392,465  | 2,332,559        | 97%         |
| weighted sales pipeline |            | 74,000           |             |
| BOC projection          |            | 37,767           |             |
| Upstream forecast       |            | 8,900            |             |
| blackhawk               |            | 2,100            |             |
|                         |            | <b>2,455,325</b> | <b>103%</b> |

| Rhode Island     | 2018 Savings to date and year-end forecast (stretch targets) |           |       |      |          |             |           |        |       |
|------------------|--------------------------------------------------------------|-----------|-------|------|----------|-------------|-----------|--------|-------|
|                  | Assigned Goal                                                | Paid      | P(%G) | Δ    | Pipeline | Projection* | Forecast  | F (%G) | Δ     |
| Sales            | 2,300,892                                                    | 1,924,561 | 84%   | 0.9% | 165,645  |             | 2,090,206 | 91%    | -1.9% |
| Strategic        | 2,231,665                                                    | 1,907,474 | 85%   | 0.9% | 163,211  |             | 2,070,686 | 93%    | -2.0% |
| Channel          | 69,226                                                       | 17,086    | 25%   | 0.7% | 2,434    |             | 19,520    | 28%    | 0.7%  |
| Presc-no Rep     | 28,875                                                       | 24,045    | 83%   | 0.0% | -        | 2,186       | 26,231    | 91%    | 0.0%  |
| Upstream/POS     | 70,560                                                       | 184,101   | 261%  | 0.0% |          | 8,967       | 193,068   | 274%   | 0.0%  |
| Codes & BOC      | 3,088                                                        | 3,089     | 100%  | 0.0% |          | -           | 3,089     | 100%   | 0.0%  |
| LCI              | 2,403,415                                                    | 2,135,796 | 89%   | 0.9% | 165,645  | 11,153      | 2,312,595 | 96%    | -1.8% |
| C&I Multi Family | 69,752                                                       | 94,616    | 136%  | 0.0% |          | 7,609       | 102,225   | 147%   | 0.0%  |
| SBS/DI           | 33,649                                                       | 32,602    | 97%   | 0.0% |          | -           | 32,602    | 97%    | 0.0%  |
| C&I Total        | 2,506,815                                                    | 2,263,014 | 90%   | 0.9% | 165,645  | 18,762      | 2,447,422 | 98%    | -1.8% |
| Income Eligible  | 329,884                                                      | 353,121   | 107%  | 0.0% |          | 11,080      | 364,201   | 110%   | 0.0%  |
| Residential      | 1,764,482                                                    | 1,804,659 | 102%  | 0.0% |          | 245,156     | 2,049,815 | 116%   | 0.0%  |

From: [REDACTED]  
Sent: Wednesday, January 09, 2019 4:56 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: accruals understated and 2018 charges  
Importance: High

One of the invoices not accrued for RI MF is for the commercial sector. Looks like 8,300 therms. Email below indicates is was included in the projection. Is there a preference for this to be paid/counted toward 2018 or not for the RI Gas C&I portfolio? Is RI C&I gas still over 100% w/o this and any other changes recently?

It may not be an option to count to 2018, anticipating more direction from [REDACTED] [REDACTED] [REDACTED] on that. If you prefer it paid, please let me know and I will respond all on the email chain and include you as well.

The other MF invoices are residential or income eligible.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 3:51 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** accruals understated and 2018 charges  
**Importance:** High

Hello everyone,  
It recently came to our attention that there was a large number of invoices that were not properly accrued via the manual process. It was one vendor in particular that underreported accruals and impacted multiple programs, Multifamily (MA and RI) and HES (MA). Due to MF it impacts both residential and commercial. The vendor has been made aware of the error and future training will be held.

The attached spreadsheet shows the figures. (Thanks to [REDACTED])  
***The request is that even though these charges were not manually accrued, due to a self-imposed National Grid deadline, they should be backdated to 2018.***

- For MA, this is the end of the 3 year term and therefore expenses should hit the 2018 budget.
- All work associated with these invoices was completed in 2018.
- These invoices/charges/savings were included in forecasts.
- It is not as critical for RI as we are in the middle of 3 year term so could be carried over to 2019.

Let me know if any questions. **Please let us know by Friday if these charges can be backdated.** Thanks.

<< File: 2018 Outstanding Invoices\_manual accruals\_[REDACTED].xlsx >>

[REDACTED]

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 1/9/2019 8:02:55 PM (UTC)  
**Subject:** RE: details for Multifamily MA / RI

Nothing from [REDACTED]

[REDACTED]

Please consider the environment before printing this email.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 3:02 PM  
**To:** [REDACTED]  
**Subject:** RE: details for Multifamily MA / RI

Did you hear from [REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 3:02 PM  
**To:** [REDACTED]  
**Subject:** RE: details for Multifamily MA / RI

I didn't put in your invoices – hold please Let me redo w/ your info

[REDACTED]

Please consider the environment before printing this email.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 3:01 PM  
**To:** [REDACTED]  
**Subject:** RE: details for Multifamily MA / RI

Are my invoices in here also?  
I don't see the pivot table.

**From:** [REDACTED]  
**Sent:** Wednesday, January 09, 2019 2:58 PM  
**To:** [REDACTED]  
**Subject:** details for Multifamily MA / RI

Hi [REDACTED]  
Here are the Multifamily details we spoke about. Pivot table shows the breakdown by State/fuel type  
The only invoices I was planning on holding are the RI ; Gas ; Low Income  
It's was going to push the numbers way over for savings & spend on that line item.  
Those two invoices are noted in the attached. Let me know if you need something else.  
Thanks,  
[REDACTED]

[REDACTED]

Please consider the environment before printing this email.  
[REDACTED]

To: [REDACTED]  
From: [REDACTED]

Sent: Wed 12/23/2020 12:43:47 PM (UTC)  
Subject: FW: wrs 051032

Hi. Just an fyi, the small gas calculating issue I mentioned the other day is RI only and we look to have finally figured it out, a fix is in the making. [REDACTED] concern was that they will make their gas goal, (our stretch), but are hitting the stop button right at goal so as not to exceed budget and if we then make a correction concerning these units which drops them just below goal that would be wrong as he is holding back on other jobs. This should be corrected today so shouldn't be an issue but should that have happened and since it's our bad I would want to honor and pay out for that gas goal if your ok with that? It's small money. Then as a separate note RI electric is still as last reported, 90% of filed goal and 100% budget but Vin did mention he has more jobs done he could submit if needed but it would put them just over the 100%. I said no, to hold off but could change if you say to. Happy Wednesday.

---

From: [REDACTED]  
Sent: Wednesday, December 23, 2020 7:15 AM  
To: [REDACTED]

Subject: Re: wrs 051032

Hi [REDACTED]  
  
I am looking into it. Will be sharing the test case shortly.

Thanks,  
[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, December 23, 2020 5:33 PM  
To: [REDACTED]

Subject: RE: wrs 051032

Hi [REDACTED]  
  
Thanks for checking on Impact side.  
  
LF\_SHWR\_HD\_1.75\_GPM\_DI has 52 therms which is correct. So we need to correct the deemed saving in other lookup table(sbs\_direct\_install\_gas\_measure : this is used to calculate the saving on screen : 19.5).  
SALON\_NOZZLE has 204 therms which is correct, so here also we need to correct the deemed saving in other lookup table that has value 114.

Hi [REDACTED]  
  
Can you make the correct changes in sbs\_direct\_install\_gas\_measure tables and share the Test Case as well?

Regards,  
[REDACTED]

---

From: [REDACTED]  
Sent: Tuesday, December 22, 2020 8:34 PM  
To: [REDACTED]



**Subject:** RE: wrs 051032

Hi [REDACTED]

Is the impact table something I am able to see? On the screen, I see 52 therms for LF\_SHWR\_HD\_1.75\_GPM\_DI and 204 therms for SALON\_NOZZLE, which are the correct values.

The values displayed on the facility detail show the incorrect gross savings, but the net savings seem to be calculated using the correct values.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 16, 2020 5:35 PM

**To:** [REDACTED]

**Subject:** RE: wrs 051032

Hi [REDACTED]

Impact Group (LF\_SHWR\_HD\_1.75\_GPM\_DI) Id : 350 has **GROSS\_ANNUAL\_THERMS\_DHW** value as **19.5 in impact tables. While adding the measure on screen the deemed saving set up in DSM look up table is 52. So either look up value is wrong or gross annual therms dhw factor is wrong on impact side.**

Similarly for Impact Group (SALON\_NOZZLE ) Id : 350 has **GROSS\_ANNUAL\_THERMS\_DHW** as **114 on impact side but in InDemand table the saving is stored a 204.**

So we need your help in checking these values as the value should be consistent in both tables (impact tables and InDemand look up table).

Regards,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 16, 2020 5:07 PM

**To:** [REDACTED]

**Cc:** [REDACTED]  
**Subject:** RE: wrs 051032

**Importance:** High

Thanks [REDACTED] Looping in [REDACTED] as this is RI C&I gas.

[REDACTED] – [REDACTED] has identified that savings are not calculating properly for RI small business gas measures. InDemand team is saying that the issue is with the impact factors. Attached the extract and details of codes below in yellow. I had a quick look at the WRS, it looks like the net savings > gross savings for below measures. I briefly looked at your factors, and the NTG formula cannot have caused the net > gross savings. It would be gross savings\*(1-0.014+0+0), so I am unsure. This is critical for year-end, so it will be great if you can provide your inputs.

[REDACTED] – Evaluation analysts manage the impact factors in InDemand and also oversee evaluation studies. I am fairly new to the team, but the impact factors have been in place for at least over a decade now, and using these factors gross savings get converted to net savings and benefits. Hope this answers your question about role of evaluation analysts. Feel free to reach out if you want to know more.

Thanks,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, December 16, 2020 2:50 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: wrs 051032

Hi [REDACTED]

The issue is for RI applications. Please see below details for impact group and program.

Impact group: 350- LF\_SHWR\_HD\_1.75\_GPM\_DI (Measure:SHOWER\_HEAD)

Impact group: 351- FAUCET\_AERATOR\_0.5\_DI (Measure:AERATOR)

Impact group: 352 -SALON\_NOZZLE (measure:SALON\_NOZZLE)

Program Id-75 (C&I Direct Install)

Regards,  
[REDACTED]

---

REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Mon 1/4/2021 1:47:27 PM (UTC)  
Subject: RE: RE: No invoice should be paid until okayed

[REDACTED] I have a meeting scheduled with you & [REDACTED] on your return from vacation on 1/8/21 so we can discuss Retail invoices. Sounds like there was a slight misunderstanding on some of the gas invoices that I'm sure we can rectify when we chat on Friday. Enjoy your break!

---

From: [REDACTED]  
Sent: Monday, January 4, 2021 8:14 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: RE: No invoice should be paid until okayed

Okay. I will hold off.

There have been some that I have paid in the HVAC and RCD Energy Federation Inc that have caused issues for [REDACTED] Not knowing who owns what Retail Invoice has caused her anxiety for which I am sorry. Maybe this year we can go over what I need to look for (so I know which PM owns what invoice), it will help me do my job better.

[REDACTED]

[REDACTED]

Advance notice of vacation:

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 04, 2021 12:13 AM  
To: [REDACTED]  
Subject: RE: No invoice should be paid until okayed

Hi [REDACTED] I hope you had a good holiday season and a good beginning to fiscal year 2021. Please let me wish you a happy new year.

Just wanted, to give you a heads up , please stop processing invoices in the next 2 weeks of 2021 until you hear from myself and [REDACTED]

In order to help aligning spending, payments and yearend accruals , only program managers can determine that efforts. For HVAC E Invoices and New construction , I would like a review prior to releasing and you can consult with Greg on how to handle his invoices .

Thank you ,



**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Wed 1/13/2021 8:12:37 PM (UTC)  
**Subject:** RE: EXT || RE: Energy Star Products Invoice #187200 for State :RI is now submitted

Hi [REDACTED]

Since it was not accrued, I will pay it next week and it will hit 2021.

Thanks!

[REDACTED]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2021 3:11 PM  
**To:** [REDACTED]  
**Subject:** EXT || RE: Energy Star Products Invoice #187200 for State :RI is now submitted

This is a really large appliance invoice, definitely out of volume compared to what we expected, there was only 30K accrued for products in NECO so I'm not sure if we should include it for 2020. We can if you'd like, but ultimately your call!

[REDACTED]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2021 3:04 PM  
**To:** [REDACTED]  
**Subject:** FW: Energy Star Products Invoice #187200 for State :RI is now submitted

Hi [REDACTED]

This is the only other one I have a question on. Should this be 2020 or 2021?

Was it accrued?

Thanks!

[REDACTED]


-----Original Message-----

**From:** [REDACTED]  
**Sent:** Wednesday, January 13, 2021 11:29 AM  
**To:** [REDACTED]  
**Cc:** mhansen@efi.org  
**Subject:** Energy Star Products Invoice #187200 for State :RI is now submitted

Hi,

The invoice #187200 for amount \$160901.0 of Energy Star Products program has been now submitted and is ready for your attention.

Thanks,



PS: This is an auto-generated email from the system and was sent for your information.  
Please do not reply to this mail, if needed please contact the sender directly.  
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| Email Listing by Program_Year |      |          |                            |                                          |                                                      |            |
|-------------------------------|------|----------|----------------------------|------------------------------------------|------------------------------------------------------|------------|
| Seq                           | Year | Utility  | Sector                     | Program                                  | Year/Utility/Program                                 | Email Ref  |
| 1                             | 2012 | Electric | Non-Low Income Residential | Residential New Construction             | 2012ElectricResidential New Construction             | PUC 3-4-1  |
| 2                             | 2013 | Electric | Commercial & Industrial    | Large Commercial New Construction        | 2013ElectricLarge Commercial New Construction        | PUC 3-4-2  |
| 3                             | 2013 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | 2013ElectricLarge Commercial Retrofit                | PUC 3-4-2  |
| 4                             | 2013 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | 2013GasEnergy Star® HVAC                             | PUC 3-4-3  |
| 5                             | 2013 | Gas      | Non-Low Income Residential | EnergyWise                               | 2013GasEnergyWise                                    | PUC 3-4-3  |
| 6                             | 2015 | Electric | Low Income Residential     | Single Family - Income Eligible Services | 2015ElectricSingle Family - Income Eligible Services | PUC 3-4-4  |
| 7                             | 2015 | Electric | Low Income Residential     | Income Eligible Multifamily              | 2015ElectricIncome Eligible Multifamily              | PUC 3-4-4  |
| 8                             | 2015 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | 2015GasLarge Commercial New Construction             | PUC 3-4-5  |
| 9                             | 2015 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | 2015GasLarge Commercial Retrofit                     | PUC 3-4-5  |
| 10                            | 2016 | Electric | Commercial & Industrial    | Large Commercial New Construction        | 2016ElectricLarge Commercial New Construction        | PUC 3-4-6  |
| 11                            | 2016 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | 2016ElectricLarge Commercial Retrofit                | PUC 3-4-6  |
| 12                            | 2016 | Electric | Commercial & Industrial    | Small Business Direct Install            | 2016ElectricSmall Business Direct Install            | PUC 3-4-7  |
| 13                            | 2016 | Electric | Low Income Residential     | Income Eligible Multifamily              | 2016ElectricIncome Eligible Multifamily              | PUC 3-4-8  |
| 14                            | 2016 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | 2016ElectricEnergy Star® HVAC                        | PUC 3-4-9  |
| 15                            | 2016 | Electric | Non-Low Income Residential | EnergyWise                               | 2016ElectricEnergyWise                               | PUC 3-4-10 |
| 16                            | 2016 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | 2016ElectricENERGY STAR® Lighting                    | PUC 3-4-11 |
| 17                            | 2016 | Electric | Non-Low Income Residential | Residential Consumer Products            | 2016ElectricResidential Consumer Products            | PUC 3-4-11 |
| 18                            | 2016 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | 2016GasLarge Commercial New Construction             | PUC 3-4-12 |
| 19                            | 2016 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | 2016GasLarge Commercial Retrofit                     | PUC 3-4-12 |
| 20                            | 2016 | Gas      | Commercial & Industrial    | Small Business Direct Install            | 2016GasSmall Business Direct Install                 | PUC 3-4-13 |
| 21                            | 2016 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | 2016GasCommercial & Industrial Multifamily           | PUC 3-4-8  |
| 22                            | 2016 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | 2016GasEnergy Star® HVAC                             | PUC 3-4-14 |
| 23                            | 2016 | Gas      | Non-Low Income Residential | Residential New Construction             | 2016GasResidential New Construction                  | PUC 3-4-14 |
| 24                            | 2017 | Electric | Low Income Residential     | Single Family - Income Eligible Services | 2017ElectricSingle Family - Income Eligible Services | PUC 3-4-15 |
| 25                            | 2017 | Electric | Non-Low Income Residential | Residential New Construction             | 2017ElectricResidential New Construction             | PUC 3-4-15 |
| 26                            | 2017 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | 2017ElectricEnergy Star® HVAC                        | PUC 3-4-15 |
| 27                            | 2017 | Electric | Non-Low Income Residential | EnergyWise Multifamily                   | 2017ElectricEnergyWise Multifamily                   | PUC 3-4-16 |
| 28                            | 2017 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | 2017ElectricENERGY STAR® Lighting                    | PUC 3-4-17 |
| 29                            | 2017 | Electric | Non-Low Income Residential | Residential Consumer Products            | 2017ElectricResidential Consumer Products            | PUC 3-4-18 |
| 30                            | 2017 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | 2017GasLarge Commercial New Construction             | PUC 3-4-19 |
| 31                            | 2017 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | 2017GasLarge Commercial Retrofit                     | PUC 3-4-19 |
| 32                            | 2017 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | 2017GasCommercial & Industrial Multifamily           | PUC 3-4-19 |
| 33                            | 2017 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | 2017GasSingle Family - Income Eligible Services      | PUC 3-4-15 |
| 34                            | 2017 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | 2017GasEnergy Star® HVAC                             | PUC 3-4-20 |
| 35                            | 2017 | Gas      | Non-Low Income Residential | EnergyWise Multifamily                   | 2017GasEnergyWise Multifamily                        | PUC 3-4-21 |
| 36                            | 2017 | Gas      | Non-Low Income Residential | Residential New Construction             | 2017GasResidential New Construction                  | PUC 3-4-20 |
| 37                            | 2018 | Electric | Commercial & Industrial    | Small Business Direct Install            | 2018ElectricSmall Business Direct Install            | PUC 3-4-22 |
| 38                            | 2018 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | 2018ElectricENERGY STAR® Lighting                    | PUC 3-4-23 |
| 39                            | 2018 | Electric | Non-Low Income Residential | Residential New Construction             | 2018ElectricResidential New Construction             | PUC 3-4-24 |
| 40                            | 2018 | Gas      | Commercial & Industrial    | Small Business Direct Install            | 2018GasSmall Business Direct Install                 | PUC 3-4-22 |
| 41                            | 2018 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | 2018GasCommercial & Industrial Multifamily           | PUC 3-4-25 |
| 42                            | 2018 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | 2018GasSingle Family - Income Eligible Services      | PUC 3-4-26 |
| 43                            | 2018 | Gas      | Low Income Residential     | Income Eligible Multifamily              | 2018GasIncome Eligible Multifamily                   | PUC 3-4-26 |
| 44                            | 2018 | Gas      | Non-Low Income Residential | Residential New Construction             | 2018GasResidential New Construction                  | PUC 3-4-24 |
| 45                            | 2020 | Electric | Commercial & Industrial    | Small Business Direct Install            | 2020ElectricSmall Business Direct Install            | PUC 3-4-27 |
| 46                            | 2020 | Electric | Non-Low Income Residential | Residential New Construction             | 2020ElectricResidential New Construction             | PUC 3-4-28 |
| 47                            | 2020 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | 2020ElectricEnergy Star® HVAC                        | PUC 3-4-28 |
| 48                            | 2020 | Electric | Non-Low Income Residential | Residential Consumer Products            | 2020ElectricResidential Consumer Products            | PUC 3-4-29 |

PUC Post-Decisional 3-5

Request:

Referencing page 11 of the Review, please provide a copy of each email “in which the holding of invoices was discussed, but the particular program could not be identified.”

Response:

On page 11 of the Review, the Company indicated that it “also examined emails in which the holding of invoices was discussed, but the particular program could not be identified.” The set of emails to which that statement refers are attached as Attachment PUC 3-5-1 through 3-5-20.

The investigation, through its review of the collection set of approximately 500,000 emails, narrowed down a set of responsive emails to the attached which demonstrate discussion of delaying invoices, but the particular program could not be identified.



REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Fri 12/7/2018 1:27:39 PM (UTC)  
Subject: RE: NE EE Gas 2018 Portfolios - update 12/06/2018

Hi [REDACTED]  
Sorry for delay in response. I was at MA statewide meeting most of yesterday.  
Yes, we have been monitoring. The overachievement of savings is due to Opower, which [REDACTED] has been addressing with external stakeholders all year. Hawk is not able to pay customers until we pay them so doing all possible, without impacting customer rebates. Happy to talk further.

---

From: [REDACTED]  
Sent: Thursday, December 06, 2018 12:30 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: NE EE Gas 2018 Portfolios - update 12/06/2018

Hi [REDACTED] and [REDACTED]  
For RI Gas, does Residential want to consider holding back any invoices for this year, as the forecast is projecting 140%. Since we can't earn above 125%, it's wasted savings for 2018.

Thoughts?

---

From: [REDACTED]  
Sent: Thursday, December 06, 2018 12:27 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: NE EE Gas 2018 Portfolios - update 12/06/2018

Good afternoon,  
This is one of many emails that will be sent to you through year-end with important updates regarding the 2018 MA & RI EE Gas Portfolios. These emails will be distributed on Mondays and Thursdays through the end of the 2018 program year. If anyone was missed in the distribution, I apologize, but please forward and let me know to add them to future distributions. If you would like to be removed from the distribution list, please let me know. - [REDACTED]

Below are the current dashboards for claimed savings and year-end forecasts. The change from 12/04/2018 results in percentage points for both paid and forecasted is included in the  $\Delta$  columns.

- MA Claimed savings - 2018 total portfolio claimed savings increased 0.8% to 74% of 2018 filed goal.
  - C&I claimed savings saw no increase and remain at 65%, Resi-IE claimed savings increased 2.2% to 96%, and Resi claimed savings increased 1.1% to 75% of 2018 filed sector goals.
  - 16-18 3Y Plan Goal claimed to date increased 0.3% to 92%.
- MA Forecasted savings - C&I Program Operations & My Energy Solutions teams recently refined their programs' year-end forecasts.
  - 2018 total forecasted savings decreased 3.8% to 103% of the filed goal.
  - C&I forecast decreased 4% to 96%, Resi-LI is 106% and Resi is 111% of their filed 2018 goals-
    - Multi-Family New Construction decreased their forecast by 3.5% to 48% and Commercial Multi-Family Retrofit decreased by 2.7% to 104% of their assigned goals;
    - The savings forecast from LCI Sales' applications decreased 4.8% to 69% of their assigned goals;
      - LCI Sales' 2018 \*pipeline increased by ~712K Net Lifetime Therms
      - 2018 Custom Gas applications remaining to pay - upper pipeline - 129 (-2 since 12/04)
  - 16-18 3Y Plan forecast decreased 1.4% to 102% of goal.
- RI Claimed savings - 2018 total C&I Portfolio claimed savings increased 0.2% to 73% of the filed goal, Resi-IE Portfolio claimed savings increased 0.5% to 101% & Resi Portfolio claimed savings increased 1.2% to 115% of their filed goal.
- RI Forecasted savings - C&I Program Operations & My Energy Solutions teams recently refined their programs' year-end

REDACTED

forecasts

- 2018 total C&I Portfolio forecast increased 5.6% to 106% of the filed goal
  - Forecasted savings from Prescriptive applications (without Sales involvement) decreased 8.6% to 86%
  - Commercial Multi-Family Retrofit forecast increased by 16.1%
  - The savings forecast from LCI Sales' applications increased 5.8% to 95% of their assigned goals;
    - LCI Sales' 2018 \*pipeline increased by ~32K Net Annual Therms
    - 2018 Custom Gas applications remaining to pay - upper pipeline - 44 (+4 since 12/04)
- 2018 total Resi-IE Portfolio forecast decreased by 0.1% to 126%
- 2018 total Resi Portfolio forecast increased 2.2% to 140%

\*weighted pipeline = application savings X application probability %

These numbers are derived from the best available information from vendors, contractors, and internal sales staff, and reflect the current understanding of our pipeline. As new information is received, year-end forecasts will fluctuate. If you believe something is in error, please contact a program manager.

| Massachusetts             | 2018 Savings to date and year-end forecast (stretch targets) |             |       |       |            |             |             |       |             |
|---------------------------|--------------------------------------------------------------|-------------|-------|-------|------------|-------------|-------------|-------|-------------|
|                           | Stretch NLT Goal                                             | Paid        | P(%G) | Δ     | Pipeline   | Projection  | Forecast    | F(%G) | Δ           |
| Sales                     | 77,497,969                                                   | 34,741,327  | 45%   | -0.2% | 21,778,721 | (2,856,182) | 53,663,866  | 69%   | -4.8%       |
| Strategic                 | 70,531,483                                                   | 28,930,720  | 41%   | 0.0%  | 20,893,217 |             | 49,823,937  | 71%   | 1.5%        |
| North                     | 30,995,107                                                   | 13,628,479  | 44%   | 0.0%  | 6,645,429  |             | 20,273,908  | 65%   | 1.0%        |
| South                     | 39,536,376                                                   | 15,302,241  | 39%   | -0.1% | 14,247,788 |             | 29,550,029  | 75%   | 1.9%        |
| Channel                   | 6,966,486                                                    | 5,810,607   | 83%   | -1.6% | 885,504    |             | 6,696,111   | 96%   | -5.1%       |
| Upstream/POS              | 11,560,067                                                   | 10,103,535  | 87%   | 0.0%  |            | 1,660,392   | 11,763,927  | 102%  | 0.0%        |
| Presc-no Rep              | 1,756,158                                                    | 1,038,179   | 59%   | 8.0%  |            | 397,955     | 1,436,134   | 82%   | 0.0%        |
| LCI                       | 90,814,194                                                   | 45,883,041  | 51%   | 0.0%  | 21,778,721 | (797,835)   | 66,863,927  | 74%   | -4.1%       |
| Multi Family HR           | 1,657,760                                                    | 543,081     | 33%   | 0.0%  |            | 244,394     | 787,475     | 48%   | -3.5%       |
| Multi Family Retro        | 3,684,411                                                    | 1,460,742   | 40%   | 0.0%  |            | 2,379,258   | 3,840,000   | 104%  | -2.7%       |
| SBS/DI                    | 1,120,448                                                    | 763,213     | 68%   | 0.9%  |            | 36,787      | 800,000     | 71%   | 4.0%        |
| Commercial & Industrial   | 97,276,814                                                   | 48,650,077  | 50%   | 0.0%  | 21,778,721 | 1,862,604   | 72,291,402  | 74%   | -4.0%       |
| Income Eligible           | 29,087,380                                                   | 23,499,200  | 81%   | 2.2%  |            | 2,212,493   | 25,711,693  | 88%   | -1.2%       |
| Residential               | 117,923,349                                                  | 81,334,612  | 69%   | 1.1%  |            | 33,930,661  | 115,265,274 | 98%   | -4.3%       |
| 2018 Total                | 244,287,543                                                  | 153,483,889 | 63%   | 0.8%  | 21,778,721 | 38,005,758  | 213,268,368 | 87%   | -3.8%       |
| 2017 Total                | 219,203,150                                                  | 206,839,263 | 94%   | 0.0%  |            |             | 206,839,263 | 94%   | 0.0%        |
| 2016 Total                | 200,334,570                                                  | 199,115,023 | 99%   | 0.0%  |            |             | 199,115,023 | 99%   | 0.0%        |
| 3-year total Stretch Goal | 663,825,263                                                  | 559,438,176 | 84%   | 0.3%  |            |             | 619,222,655 | 93%   | -1.4%       |
|                           |                                                              |             |       |       |            |             |             |       | Filed Goal  |
|                           |                                                              |             |       |       |            |             |             |       | 75,082,111  |
|                           |                                                              |             |       |       |            |             |             |       | 24,472,280  |
|                           |                                                              |             |       |       |            |             |             |       | 108,190,149 |
|                           |                                                              |             |       |       |            |             |             |       | 207,744,539 |

| Rhode Island     | 2018 Savings to date and year-end forecast (stretch targets) |           |       |      |          |             |           |       |            |
|------------------|--------------------------------------------------------------|-----------|-------|------|----------|-------------|-----------|-------|------------|
|                  | Assigned Goal                                                | Paid      | P(%G) | Δ    | Pipeline | Projection* | Forecast  | F(%G) | Δ          |
| Sales            | 2,300,892                                                    | 1,440,552 | 63%   | 0.2% | 533,913  | 200,695     | 2,175,160 | 95%   | 5.8%       |
| Strategic        | 2,231,665                                                    | 1,425,286 | 64%   | 0.2% | 532,088  |             | 1,957,373 | 88%   | 1.4%       |
| Channel          | 69,226                                                       | 15,266    | 22%   | 0.0% | 1,826    |             | 17,092    | 25%   | 0.0%       |
| Presc-no Rep     | 28,875                                                       | 22,689    | 79%   | 0.0% | -        | 2,063       | 24,752    | 86%   | -8.6%      |
| Upstream/POS     | 70,560                                                       | 165,886   | 235%  | 0.0% |          | 27,182      | 193,068   | 274%  | 0.0%       |
| Codes & BOC      | 3,088                                                        | -         | 0%    | 0.0% |          | 3,088       | 3,088     | 100%  | 0.0%       |
| LCI              | 2,403,415                                                    | 1,629,127 | 68%   | 0.2% | 533,913  | 233,028     | 2,396,068 | 100%  | 5.4%       |
| C&I Multi Family | 69,752                                                       | 91,027    | 131%  | 0.0% |          | 11,198      | 102,225   | 147%  | 16.1%      |
| SBS/DI           | 33,649                                                       | 25,732    | 76%   | 0.0% |          | 6,388       | 32,120    | 95%   | 0.0%       |
| C&I Total        | 2,506,815                                                    | 1,745,886 | 70%   | 0.2% | 533,913  | 250,614     | 2,530,413 | 101%  | 5.6%       |
| Income Eligible  | 329,884                                                      | 291,591   | 88%   | 0.5% |          | 72,610      | 364,201   | 110%  | -0.1%      |
| Residential      | 1,764,482                                                    | 1,688,478 | 96%   | 1.2% |          | 36,1337     | 2,049,815 | 116%  | 2.2%       |
|                  |                                                              |           |       |      |          |             |           |       | Filed Goal |
|                  |                                                              |           |       |      |          |             |           |       | 2,392,465  |
|                  |                                                              |           |       |      |          |             |           |       | 288,422    |
|                  |                                                              |           |       |      |          |             |           |       | 1,467,062  |

REDACTED

[REDACTED]

[REDACTED]

[REDACTED]

REDACTED

To: [REDACTED]  
From: [REDACTED]

Sent: Wed 11/7/2018 1:51:14 PM (UTC)  
Subject: RE: follow up to staff re: year end

Thank you.

---

From: [REDACTED]  
Sent: Wednesday, November 07, 2018 8:50 AM  
To: [REDACTED]  
Subject: RE: follow up to staff re: year end

Hi [REDACTED]  
Please my notes in red below.

Holding invoices has been done almost every year , but it's a delicate exercise not to trigger any customer or contractor, Hers rater issues.

In the past when strategy was serious about over spending, they will give me a number in \$\$ to work with , then figure with CR who/ how to differ invoices.

Also, holding gas invoices will also impact the electric spending and savings for homes are both gas & electric.

Thanks,  
[REDACTED]

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From: [REDACTED]  
Sent: Wednesday, November 07, 2018 7:29 AM  
To: [REDACTED]  
Subject: follow up to staff re: year end

Hi [REDACTED]  
As a follow up to yesterday's staff meeting where we discussed tactics for year end, a couple of questions:

1. How often do your gas vendors, specifically RI NC, invoice? Monthly, bi-weekly etc **Both MA & RI invoice once a month**
2. Are they able to invoice more frequently, through end of year, to give us better control over the amounts? So instead of getting one large invoice, perhaps we could get more smaller ones, say weekly? **MA Can't , but RI always invoice twice in December if needed, can invoice before yearend closing in January.**
3. Who is your contact at CLEAResult? **Rachel Pinnons** Are there other vendors that manage this program or mostly just CR? **No**  
Can you get an idea of how many therms/kwh they have in pipeline that have not been invoiced yet? Thanks. **With additional \$95,000 in spend & around 4,359 annual therms.**
- 4.

[REDACTED]

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Wed 2/6/2019 4:12:05 AM (UTC)  
Subject: RE: Best Buy TV Overages and Extension approval

Thanks [REDACTED]  
1. I will not pay for Nov. or Dec. Best Buy overages.  
2. Yes, I will pay for RI December invoice to be counted toward 2013.  
3. Yes, I approve

---

From: [REDACTED]  
Sent: Thursday, January 10, 2013 12:56 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Best Buy TV Overages and Extension approval  
Importance: High

Hi [REDACTED]

National Grid's MA Best Buy program ended on 5/31 and RI's program ended on 11/30. You have a few options to consider.

1. For MA, If you would like to take credit for November and December sales, Novembers units are \$69,480 or 3,474 5.3 units and Decembers units are \$73,880 or 3,694 5.3 units. You can chose to reject these both of these overages, pay for November or pay for both November and December. November and December would count towards 2013's goals, 5.3 units only.
2. The RI program did not have any overages, however the program did end on 11/31. Would you like to accept the December invoice of \$14,400 which is 1,440 5.3 units?
3. Last question, do you approve of the attached 2013 extension for this program 1/1-2/28? I had funding of \$200k for MA and \$40k for RI. This includes 5.3 models and Top 10 models.

Hopefully this is not too confusing, I know I was confused at first, please let me know if you have any questions or would like to have a call to review.

Thanks,

[REDACTED]  
[REDACTED]  
[REDACTED]

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From: [REDACTED]  
Sent: Thursday, January 10, 2013 11:57 AM  
To: [REDACTED]  
Subject: Re: FW: EXTERNAL: Best Buy November and December Pre-Processing (2010-652)

Here are replacement charts (monthly expected payments as well as overall budget). The only change is that they now include valid ESTAR amounts for NGRID MA for November and December.

| <b>Best Buy November</b> |                  |                           |                       |
|--------------------------|------------------|---------------------------|-----------------------|
| <b>Sponsor</b>           | <b>Requested</b> | <b>Valid (E-Star 5.3)</b> | <b>Invalid Models</b> |
| CLC                      | \$10,800         | \$6,720                   | \$4,080               |
| NSTAR                    | \$102,400        | \$64,740                  | \$37,660              |
| WMECO                    | \$12,460         | \$8,120                   | \$4,340               |
| UNITIL                   | \$2,000          | \$1,320                   | \$680                 |
| NGRID MA                 | \$107,660        | \$69,480                  | \$38,180              |
| NGRID RI                 | \$18,330         | \$11,820                  | \$6,510               |
| <b>Totals</b>            | <b>\$253,650</b> | <b>\$162,200</b>          | <b>\$91,450</b>       |
| %                        | 100%             | 63.9%                     | 36.1%                 |

| <b>Best Buy December</b> |                  |                           |                       |
|--------------------------|------------------|---------------------------|-----------------------|
| <b>Sponsor</b>           | <b>Requested</b> | <b>Valid (E-Star 5.3)</b> | <b>Invalid Models</b> |
| CLC                      | \$11,100         | \$7,920                   | \$3,180               |
| NSTAR                    | \$88,760         | \$66,860                  | \$21,900              |
| WMECO                    | \$13,000         | \$10,200                  | \$2,800               |
| UNITIL                   | \$1,400          | \$940                     | \$460                 |

|               |                  |                  |                 |
|---------------|------------------|------------------|-----------------|
| NGRID MA      | \$97,540         | \$73,880         | \$23,660        |
| NGRID RI      | \$19,170         | \$14,400         | \$4,770         |
| <b>Totals</b> | <b>\$230,970</b> | <b>\$174,200</b> | <b>\$56,770</b> |
| %             | 100%             | 75.4%            | 24.6%           |

REDACTED

| Totals   | Amen<br>d. 24<br>Fund<br>ing | Jan \$<br>Grant<br>ed | Feb \$<br>Grant<br>ed | Mar<br>ch \$<br>Grant<br>ed | April<br>\$<br>Grant<br>ed | May \$<br>Grant<br>ed | June \$<br>Grant<br>ed | July \$<br>Grant<br>ed | Augus<br>t \$<br>Grant<br>ed | Septem<br>ber \$<br>Granted | Octob<br>er \$<br>Grant<br>ed | Novem<br>ber \$ to<br>be<br>Granted | Rema<br>ing \$<br>(expi<br>11/30) |
|----------|------------------------------|-----------------------|-----------------------|-----------------------------|----------------------------|-----------------------|------------------------|------------------------|------------------------------|-----------------------------|-------------------------------|-------------------------------------|-----------------------------------|
| NGRID RI | \$86,910                     | \$8,840               | \$8,370               | \$8,000                     | \$6,580                    | \$5,120               | \$0                    | \$0                    | \$0                          | \$5,420                     | \$6,970                       | \$11,820                            | \$25,000                          |
| NGRID MA | \$158,440                    | \$46,280              | \$40,840              | \$37,080                    | \$34,240                   | \$0                   | \$0                    | \$0                    | \$0                          | \$0                         | \$0                           | \$69,480                            | (\$69,480)                        |
| NSTAR    | \$235,800                    | \$46,680              | \$43,580              | \$38,860                    | \$36,560                   | \$0                   | \$0                    | \$0                    | \$0                          | \$32,560                    | \$37,560                      | \$64,740                            | (\$64,740)                        |
| CLC      | \$30,160                     | \$5,060               | \$4,620               | \$3,960                     | \$4,500                    | \$4,020               | \$0                    | \$0                    | \$0                          | \$3,680                     | \$4,320                       | \$6,720                             | (\$6,720)                         |
| WMECO    | \$45,620                     | \$6,260               | \$5,620               | \$6,120                     | \$4,040                    | \$3,580               | \$0                    | \$0                    | \$0                          | \$3,260                     | \$3,940                       | \$8,120                             | \$4,000                           |
| UNITIL   | \$8,000                      | \$980                 | \$920                 | \$760                       | \$860                      | \$540                 | \$680                  | \$360                  | \$560                        | \$400                       | \$720                         | \$1,320                             | (\$1,320)                         |

Thanks,

[Redacted Signature]

On 1/10/2013 8:43 AM, [Redacted] wrote:

What was the valid ESTAR for NGRID MA in November and December? Do you have this readily available?

Thanks,

[Redacted Signature]



To: [REDACTED]

REDACTED

Subject: EXTERNAL: Best Buy November and December Pre-Processing (2010-652)

We have pre-processed Best Buy's November and December sales data, and here are the forecasted numbers (As NGRID MA is not actively participating in the program at this time, all NGRID MA transactions have been grouped in the Invalid column. If they change their mind, please let me know).

The pending payments for November alone will cause overages for NSTAR, CLC, and UNITIL. If the December amounts are issued as well, WMECO will go over too. If the sponsors want to increase funding to accommodate these payments please send an amendment, and if not please let me know.

| <b>Best Buy November</b> |                  |                           |                       |
|--------------------------|------------------|---------------------------|-----------------------|
| <b>Sponsor</b>           | <b>Requested</b> | <b>Valid (E-Star 5.3)</b> | <b>Invalid Models</b> |
| CLC                      | \$10,800         | \$6,720                   | \$4,080               |
| NSTAR                    | \$102,400        | \$64,740                  | \$37,660              |
| WMECO                    | \$12,460         | \$8,120                   | \$4,340               |
| UNITIL                   | \$2,000          | \$1,320                   | \$680                 |
| NGRID MA                 | \$107,660        | \$0                       | \$107,660             |
| NGRID RI                 | \$18,330         | \$11,820                  | \$6,510               |
| <b>Totals</b>            | <b>\$253,650</b> | <b>\$92,720</b>           | <b>\$160,930</b>      |
| %                        | 100%             | 36.6%                     | 63.4%                 |

| <b>Best Buy December</b> |                  |                           |                       |
|--------------------------|------------------|---------------------------|-----------------------|
| <b>Sponsor</b>           | <b>Requested</b> | <b>Valid (E-Star 5.3)</b> | <b>Invalid Models</b> |
| CLC                      | \$11,100         | \$7,920                   | \$3,180               |
| NSTAR                    | \$88,760         | \$66,860                  | \$21,900              |
| WMECO                    | \$13,000         | \$10,200                  | \$2,800               |



|               |                  |                  |                   |
|---------------|------------------|------------------|-------------------|
| UNITIL        | \$1,400          | \$940            | REDACTED<br>\$460 |
| NGRID MA      | \$97,540         | \$0              | \$97,540          |
| NGRID RI      | \$19,170         | \$14,400         | \$4,770           |
| <b>Totals</b> | <b>\$230,970</b> | <b>\$100,320</b> | <b>\$130,650</b>  |
| %             | 100%             | 43.4%            | 56.6%             |

| Totals   | Amend . 24 Funding | Jan \$ Grant ed | Feb \$ Grant ed | March \$ Grant ed | April \$ Grant ed | May \$ Grant ed | June \$ Grant ed | July \$ Grant ed | August \$ Grant ed | September \$ Granted | October \$ Grant ed | November \$ to be Granted | Remaining \$ (exp 11/3) |
|----------|--------------------|-----------------|-----------------|-------------------|-------------------|-----------------|------------------|------------------|--------------------|----------------------|---------------------|---------------------------|-------------------------|
| NGRID RI | \$86,910           | \$8,840         | \$8,370         | \$8,000           | \$6,580           | \$5,120         | \$0              | \$0              | \$0                | \$5,420              | \$6,970             | \$11,820                  | \$25,000                |
| NGRID MA | \$158,440          | \$46,280        | \$40,840        | \$37,080          | \$34,240          | \$0             | \$0              | \$0              | \$0                | \$0                  | \$0                 | \$0                       | \$0                     |
| NSTAR    | \$235,800          | \$46,680        | \$43,580        | \$38,860          | \$36,560          | \$0             | \$0              | \$0              | \$0                | \$32,560             | \$37,560            | \$64,740                  | (\$6,000)               |
| CLC      | \$30,160           | \$5,060         | \$4,620         | \$3,960           | \$4,500           | \$4,020         | \$0              | \$0              | \$0                | \$3,680              | \$4,320             | \$6,720                   | (\$6,720)               |
| WMECO    | \$45,620           | \$6,260         | \$5,620         | \$6,120           | \$4,040           | \$3,580         | \$0              | \$0              | \$0                | \$3,260              | \$3,940             | \$8,120                   | \$4,000                 |
| UNITIL   | \$8,000            | \$980           | \$920           | \$760             | \$860             | \$540           | \$680            | \$360            | \$560              | \$400                | \$720               | \$1,320                   | (\$1,320)               |

Thanks,



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REDACTED

To: [REDACTED]  
From: [REDACTED]  
Sent: Mon 11/18/2013 2:47:38 AM (UTC)  
Subject: RE: RIEC 2014 Proposal

I agree with [REDACTED] Plenty of money left for you to use [REDACTED]

---  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

From: [REDACTED]  
Sent: Friday, November 15, 2013 1:34 PM  
To: [REDACTED]  
Subject: RE: RIEC 2014 Proposal

That should be fine. We are still in negotiations with SmartPower over the proposed increase. I would prefer not to make a payment in 2013, so we'll be lobbying to push out to 2014.

---

From: [REDACTED]  
Sent: Friday, November 15, 2013 11:53 AM  
To: [REDACTED]  
Subject: RE: RIEC 2014 Proposal

Just checking to see if you do plan to use all/any of RI Community marketing budget towards SmartPower's December payment. A request just came up to develop some banners for community events and I'd like to charge this budget. Thanks.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, November 06, 2013 2:42 PM  
To: [REDACTED]  
Subject: RE: RIEC 2014 Proposal

Hi All,

There is money left in RI Community (residential & commercial) marketing budgets totaling about \$100,000, if want to use that towards SmartPower's December payment.

\$320,000 sound like a ton of money for grassroots/community efforts in 2014! We used CET for community outreach for Efficient Neighborhoods Plus initiative in two towns in MA and it was very reasonable. Approx. \$10,000 for 3 months. Attached is a proposal that outlines their billing structure and specifically the services they provided for cost as a comparison.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, November 04, 2013 5:38 PM  
**To:** [REDACTED]  
**Subject:** RE: RIEC 2014 Proposal

Hey All - The proposed 2014 budget of \$320,000 is \$120,000 increase (60%) over the 2013 cost of \$200,000. That's pretty significant, and more than a little unexpected. When we did the 2014 planning, I didn't approach SmartPower directly because they were still considered a subcontractor of Opower. At that time, I asked [REDACTED] if he thought their 2014 services were priced similar to 2013 and he assumed so. So I think [REDACTED] and I may have added 10% and used a figure of \$220,000.

I think SmartPower has done a great job so far and is poised to do more great work in 2014. If you guys feel we have the room in other budget areas to take the extra spend, we can consider the proposed increase. However, I think we're already leaning on other budgets (like Community) to help finance the 2014 Opower budget as it stands.

Also, I noted that SmartPower wants the first payment of \$106,667 by December 1, 2013. There are a couple of issues with that:

- 1) We don't even have a separate contract with them yet. And there is no PO set up in the InDemand or SAP. And I'm not sure we could get that set up in 3 weeks.
- 2) What would that do to the 2013 BCR? We still have two outstanding 2013 invoices from Opower totaling about \$372,000. I was sitting on these pending word from [REDACTED] as to whether we can pay these in 2013 without further destroying the BCR. But if we hold them until 2014, that might be even worse on the 2014 BCR.
- 3) Lastly, there is a fundamental question about the value of our community-driven efforts. I had assumed they would increase Opower savings, but both gas and electric are REALLY struggling. I'm wondering if SmartPower isn't actually helping with an uptick in Home Energy Audits and general community goodwill (customer satisfaction), rather than directly boosting Opower savings.

Let me know your thoughts. Thanks.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, October 31, 2013 1:51 PM  
**To:** [REDACTED]  
**Subject:** FW: RIEC 2014 Proposal

And here is their 2014 proposal. They want a raise of about \$100K to hire another Matt, so we'll need to talk about how this hits our budget. Asher is trying to schedule a call for us to chat with him and his analytics team at some point soon, at which point we can start nailing down 2014 gap closing strategies.

---  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**From:** [Redacted]  
**Sent:** Thursday, October 31, 2013 11:52 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RIEC 2014 Proposal

Hi [Redacted]

Here is SmartPower's proposal for our plans and budget for the Rhode Island Energy Challenge for 2014. We are super excited to continue this great campaign to promote energy efficiency with National Grid that we have started in Rhode Island.

Please let us know if you have any questions or any need additional information. We are looking forward to working with you and the entire National Grid team!

Thanks.  
[Redacted]

[Redacted]  
[Redacted]

-----  
**SmartPower**

[Redacted]  
[Redacted]  
[Redacted]

- <http://www.smartpower.org>
- <http://solarizect.com>
- <http://www.findyourfour.com>

To:

From:

Sent: Fri 1/16/2015 4:33:27 PM (UTC)  
Subject: RE: EE Reporting Year End Accruals Update as of Jan 9th

Hello,

I have created payment requests for admin and post inspection invoices so the work that was done in 2014 will be paid with 2014 dollars. These were not huge dollars.

I will not be paying accrued Gas Applications (custom or prescriptive) per budget constraints and the fact, the team reached the savings goal.

The accrued gas applications will be paid in 2015 as they move to QA status and I will review them.

We are focusing on 2015 savings now.

Thank you.

---

From: [REDACTED]  
Sent: Friday, January 16, 2015 11:26 AM  
To: [REDACTED]  
Subject: Fwd: EE Reporting Year End Accruals Update as of Jan 9th

Sent from my iPhone  
Begin forwarded message:

From: [REDACTED]  
Date: January 16, 2015 at 11:23:38 AM EST  
To: [REDACTED]  
Subject: RE: EE Reporting Year End Accruals Update as of Jan 9th

Update -- 16 apps remaining in New England. Several are now at payment authorized : ) Looking forward to 6 pm deadline

---

Friday, January 16, 2015 10:48 AM  
: RE: EE Reporting Year End Accruals Update as of Jan 9th

We have 28 apps remaining in New England that we had anticipated initially coming in with expected completion dates in 2014. Most should come in --- there are 4 [REDACTED] apps from RI that will not come in...discussed w/ Fred & EEA this morning. They were low units...

Will keep you posted.

Friday, January 16, 2015 10:40 AM

FW: EE Reporting Year End Accruals Update as of Jan 9th

How are things progressing? Are we in good shape to have everything paid for today?

[Redacted]

**From:** [Redacted]  
**Sent:** Monday, January 12, 2015 6:48 PM

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** RE: EE Reporting Year End Accruals Update as of Jan 9th

Thank you for the report.

EE team, we need to get the invoices in and processed. Too much not paid for these accruals and we have this week to settle. How can I help?

**From:** [Redacted]  
**Sent:** Monday, January 12, 2015 4:07 PM

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** EE Reporting Year End Accruals Update as of Jan 9th

<< OLE Object: Picture (Device Independent Bitmap) >>

Hello,  
Please see the table below for the second update of the Energy Efficiency Year End Accruals as of close of business, Friday, Jan 9<sup>th</sup>. The next update will be as of end of day Wednesday, Jan 14<sup>th</sup>, delivered to you on Thursday, Jan 15<sup>th</sup>. If you have any questions, concerns, or require details to any payments made, please contact [Redacted] or [Redacted]

Regards,  
[Redacted]

| SAP Co. | Co. Desc. | Total Accrued  | Paid (01/12/15 6:00AM) | Remainder To Pay |
|---------|-----------|----------------|------------------------|------------------|
| 5210    | NIMO-E    | \$3,776,663.79 | \$1,316,418.03         | \$2,460,245.76   |
|         | NIMO-G    | \$812,856.67   | \$11,118.57            | \$801,738.10     |

|                    |                   |                        |                 |                       |                        |
|--------------------|-------------------|------------------------|-----------------|-----------------------|------------------------|
| <b>5210 Total</b>  |                   | <b>\$4,589,520.46</b>  | <b>REDACTED</b> | <b>\$1,327,536.60</b> | <b>\$3,261,983.86</b>  |
|                    | <b>5220</b> KEDNY | \$146,616.10           |                 | \$6,162.04            | \$140,454.06           |
| <b>5220 Total</b>  |                   | <b>\$146,616.10</b>    |                 | <b>\$6,162.04</b>     | <b>\$140,454.06</b>    |
|                    | <b>5230</b> KEDLI | \$215,514.87           |                 | \$267.50              | \$215,247.37           |
| <b>5230 Total</b>  |                   | <b>\$215,514.87</b>    |                 | <b>\$267.50</b>       | <b>\$215,247.37</b>    |
|                    | <b>5310</b> MECO  | \$21,123,471.92        |                 | \$5,114,173.88        | \$16,009,298.04        |
| <b>5310 Total</b>  |                   | <b>\$21,123,471.92</b> |                 | <b>\$5,114,173.88</b> | <b>\$16,009,298.04</b> |
|                    | <b>5320</b> NAECO | \$43,265.11            |                 | \$4,640.80            | \$38,624.31            |
| <b>5320 Total</b>  |                   | <b>\$43,265.11</b>     |                 | <b>\$4,640.80</b>     | <b>\$38,624.31</b>     |
|                    | <b>5330</b> BOS-G | \$5,914,211.14         |                 | \$421,081.06          | \$5,493,130.08         |
| <b>5330 Total</b>  |                   | <b>\$5,914,211.14</b>  |                 | <b>\$421,081.06</b>   | <b>\$5,493,130.08</b>  |
|                    | <b>5340</b> COL-G | \$1,647,232.87         |                 | \$72,346.74           | \$1,574,886.13         |
| <b>5340 Total</b>  |                   | <b>\$1,647,232.87</b>  |                 | <b>\$72,346.74</b>    | <b>\$1,574,886.13</b>  |
|                    | <b>5360</b> NECO  | \$5,489,810.97         |                 | \$1,767,950.36        | \$3,721,860.61         |
|                    | RIGAS             | \$301,925.53           |                 | \$142,290.19          | \$159,635.34           |
| <b>5360 Total</b>  |                   | <b>\$5,791,736.50</b>  |                 | <b>\$1,910,240.55</b> | <b>\$3,881,495.95</b>  |
| <b>Grand Total</b> |                   | <b>\$39,471,568.96</b> |                 | <b>\$8,856,449.17</b> | <b>\$30,615,119.79</b> |



To: [REDACTED]  
From: [REDACTED]  
Sent: Fri 11/30/2018 12:39:29 PM (UTC)  
Subject: FW: 2018 RI Residential Sector

Can you let me know about RNC, see below. I am expected to go over budget and may need to stop workpackage uploads if there isn't \$\$ elsewhere.

---

From: [REDACTED]  
Sent: Wednesday, November 28, 2018 11:29 AM  
To: [REDACTED]  
Subject: RE: 2018 RI Residential Sector

For EW single family gas it is tough to say since it is mainly deemed savings and we are projection 100% spend and 105% savings. We may be able to hit the savings with slightly lower spend but we are currently as 94% savings and 85% spend.

Thanks,  
[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, November 28, 2018 11:07 AM  
To: [REDACTED]  
Subject: RE: 2018 RI Residential Sector

Thanks [REDACTED]  
From latest scorecard it looks like most obvious areas where there might be some money is NC, EW or EW MF. Residential portfolio-wise it looks like there is room for the additional spend.

---

From: [REDACTED]  
Sent: Wednesday, November 28, 2018 9:58 AM  
To: [REDACTED]  
Subject: 2018 RI Residential Sector

Hi RI Gas team:  
  
To reduce RI Resi Savings for 2018, my vendor will upload data workpackages after YE, so savings can count towards 2019.  
  
Incentive invoices are being billed to my program as a Miscellaneous expense against incentive budget.  
  
My RI Resi GAS Incentive budget is now projected to overspend. At the moment to pay existing RI customers for rebates I am hoping to secure \$90K.  
  
Does anyone have \$90K to spare from 2018 budget?? If not, I will work with vendor to come up with Plan B.  
  
If so, I will run by Courtney & Rachel.

[REDACTED]  
[REDACTED]  
[REDACTED]

**To:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 1/17/2017 4:37:05 PM (UTC)  
**Subject:** RE: EXT || FW: 2016 Fall Cool Cash - Rebate Confirmation

Thank you!!!

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 17, 2017 8:37 AM  
**To:** [REDACTED]  
**Subject:** RE: EXT || FW: 2016 Fall Cool Cash - Rebate Confirmation

Hi [REDACTED]  
For budgetary reasons, we decided to hold on to November/December invoices until 2017 . The first batch should be released for payment either this week or next week. I will double check the progress of the claim with my vendor and circle back to you.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Monday, January 16, 2017 12:34 PM  
**To:** [REDACTED]  
**Subject:** EXT || FW: 2016 Fall Cool Cash - Rebate Confirmation

When you get a chance, could you check on the NGrid rebate of my 4 ton AC unit? I got a rebate from [REDACTED] already and [REDACTED] said they completed all the NGrid forms in December.

[REDACTED]

Thnx.

---

**From:** [REDACTED]  
**Sent:** Monday, January 16, 2017 10:05 AM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Hi [REDACTED] We answered a request for additional information in early December. The rebate amount for the 4-ton unit was \$ 250.00 (higher on the 3-ton proposal). You should expect to see in soon.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, January 13, 2017 3:33 PM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Ditto for info on my rebate???

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 06, 2016 9:06 AM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

[REDACTED] Did you fill out the National Grid application for the \$500 rebate for me? I did get the Carrier rebate last week and now want

to make sure I get the National Grid rebate. [REDACTED] REDACTED

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 12:02 PM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Thank you and please send me a copy.

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 11:46 AM  
**To:** [REDACTED]  
**Subject:** RE: 2016 Fall Cool Cash - Rebate Confirmation

Hi [REDACTED]  
If I didn't, I will next week and copy you on it. I'm working on the Carrier Rebates now because the expire on November 15<sup>th</sup>.

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 11:50 AM  
**To:** [REDACTED]  
**Subject:** FW: 2016 Fall Cool Cash - Rebate Confirmation

[REDACTED]

I got this from Carrier, but did [REDACTED] fill out the forms for NGrid rebate - <https://www.smartenergy-zone.com/nationalgridri/pdf/GLT.pdf>? So I can get that \$500 too? I thought you guys handled that?

Thnx.

**From:** [REDACTED]  
**Sent:** Wednesday, November 09, 2016 10:49 AM  
**To:** [REDACTED]  
**Subject:** 2016 Fall Cool Cash - Rebate Confirmation

Thank you and congratulations on your Carrier purchase!

It is recommended that you print a copy of this confirmation page for your records. Upon final approval, you should receive your Carrier Cool Cash rebate within 4-6 weeks. **Rebates are paid with a prepaid card mailed to your address listed below.** Once the card is received, you may request a direct deposit or use the card where accepted. Additional details will be provided with the card, **PLEASE USE THE CARD RIGHT AWAY. Your CITI PREPAID SERVICES Card expires on the date embossed on the front of the card.** You may not use your CITI PREPAID SERVICES Card after the Expiration Date.

Thank you again for purchasing Carrier products. We hope you continue to *Turn to the Experts* for all of your future heating or cooling needs.

**2016 Fall Cool Cash**  
Your Claim Confirmation Number is **389274206914**. Your calculated rebate is **\$ 700**.

**Sale Information**  
**Sale Date:** 10/10/2016

**Install Date:** 10/10/2016  
**Total Sale:** 12450.00  
**Invoice # / Job Code:** 2016132

REDACTED

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-5-7 (Redacted)  
Page 3 of 3

**Dealer Information**

J K L Engineering (HVAC ID# 5027)  
Providence, RI

**Sales Representative:** Ken Adams (223326)

**Customer Information**



**Product Information**

AIR CONDITIONER - 24ANB1(1216E18712)  
FAN COIL - FE(1216A85921)  
CONTROLS - SYSTXCCITC01-A(1116W001833)

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To: [REDACTED]  
From: [REDACTED]  
Sent: Mon 11/16/2015 2:32:31 PM (UTC)  
Subject: RE: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

Thanks Ishaga. I have communicated to ICF and noted that we need a separation between residential and commercial.

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, November 16, 2015 9:08 AM  
To: [REDACTED]  
Subject: RE: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

Hi [REDACTED]  
This invoice can be processed and paid as part of this year's budget or next year. What I will need from you for each project is to identify and separate invoices between Residential and C&I, which are funded by 2 different budgets in term of Incentives and STAT.

Thanks,  
[REDACTED]

---

From: [REDACTED]  
Sent: Monday, November 16, 2015 6:57 AM  
To: [REDACTED]  
Subject: FW: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

Hello [REDACTED] and [REDACTED]

This is what I received back from ICF, a proposal for funding on this year's budget. Can you cover this amount this year or do you need it to go to next year? It's short money to just get the modeling completed so I can influence the project. Do we ask them to bill us after our deadlines and tell them they will get paid in early 2016?

Thanks,  
[REDACTED]

Thanks,  
[REDACTED]

[REDACTED]

---

From: [REDACTED]  
Sent: Friday, November 13, 2015 12:50 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXTRNL SENDR || Please Approve-ATP for RI Energy Modelling

[REDACTED] as a follow up to our call, could you please approve this Authorization to Proceed (ATP) email to have ICF assist in modeling the River House Graduate Apartments on behalf of National Grid Rhode Island (Customer).

This email is to confirm that National Grid authorizes ICF to provide energy modelling services and shall not exceed the agreed upon sum of \$2,000.00 (Two thousand dollars).

The period of performance authorized by this email is to end no later than December 31, 2015. In consideration of the Services provided, ICF shall send invoices to the Customer and Customer agrees to pay ICF per invoice terms. The Customer will be invoiced after receiving and approving the final energy model. ICF's services are provided on fixed price basis per building and shall not exceed the total contract value without Customer's further approval.

Please reply that you agree to the terms written above or if you have any questions or require any additional information.

REDACTED

Regards,

[Redacted]

[Redacted]

[Redacted]

REDACTED

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]

Sent: Fri 5/31/2019 2:03:27 AM (UTC)  
Subject: RE: November Invoice

Hi [REDACTED]  
After review of the year to date spending , we realized that we are already above the program spending limit. It's unfortunate, but at this time we cannot accept any more payment between now and December.  
Please next year track gas and electric spending separately. Since you never mentioned the electric spending , I thought we have enough money and wasn't concerned at all , I would very much apologize

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, November 25, 2014 8:39 AM  
**To:** [REDACTED]  
**Subject:** November Invoice

Hi [REDACTED]  
It was good to see you yesterday. We certainly covered a lot of topics! I did want to confirm whether we can submit a November invoice with the following amounts:

- Electric: \$81K
- Gas: \$34K
- Grace Church: \$15K

If there is the possibility of additional funding beyond the amounts listed above please let me know and I can put together an estimate for December.

Thank you.  
[REDACTED]

[REDACTED]

To: [REDACTED]  
From: [REDACTED]  
Sent: Thur 11/9/2017 5:54:56 PM (UTC)  
Subject: EXT || RE: Gas Savings Goal

[REDACTED]  
Yes. We will ear mark all new opportunities for 2018.

In the numbers below, we had a project drop in that came off of a non-part follow up (so we did not have this in the pipeline reporting previously.) This was nearly 8,000 therms!

Regards,  
[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, November 09, 2017 10:51 AM  
To: [REDACTED]  
Subject: Gas Savings Goal

Hi [REDACTED]

I was looking at the numbers today and see that RISE has exceeded the gas goal of 38,212 Net Annual Therms by quite a bit with what is in the pipeline. Where I only forecasted to meet the original goal and even requested a slight reduction in 2018 numbers, I'd like to ask that we start holding back or pulling back on doing any further gas measures for 2017? Maybe anything new that comes in can be installed in early 2018 and we can start the year with a nice cushion?

|                        |         |                        | Data                   |                                 |
|------------------------|---------|------------------------|------------------------|---------------------------------|
| Vendor                 | State   | Status                 | Sum of NG Contribution | Sum of Annual Net Therm Savings |
| RISE ENGINEERIN        | RI      | Contract Signed        | 240.79                 | 444.06043                       |
|                        |         | Installation Scheduled | 1439.42                | 2085.819                        |
|                        |         | Installation Started   | 15760.67               | 18263.18817                     |
|                        |         | Invoiced               | 2567.12                | 4064.20948                      |
|                        |         | Paid                   | 23222.08               | 26689.68081                     |
|                        |         | RI Total               |                        | 43230.08                        |
| RISE ENGINEERING Total |         |                        | 43230.08               | 51546.95789                     |
| (blank)                | (blank) | (blank)                |                        |                                 |
| (blank) Total          |         |                        |                        |                                 |
| Grand Total            |         |                        | 43230.08               | 51546.95789                     |

Thanks,  
[REDACTED]



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REDACTED

To: [REDACTED]  
From: [REDACTED]

Sent: Mon 1/13/2020 8:39:11 PM (UTC)  
Subject: RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Will do. Dan just replied to Shane that the incentive will stay the same. Have a good night.

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 13, 2020 3:35 PM  
To: [REDACTED]  
Subject: RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Ok. Hold off on paying this one until 2019 is over.

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 13, 2020 3:33 PM  
To: [REDACTED]  
Subject: FW: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Hi [REDACTED]

FYI

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, January 13, 2020 3:20 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

[REDACTED]

[REDACTED] and I conducted the child post (app# 10866434) associated with the pipe insulation that was installed at Travel Leather on January 10<sup>th</sup>. We found a couple small discrepancies during our visit and had to revise the savings. Please see updated project economics below:

Initial Project Savings: 17,822 therms (80% has been claimed in the parent app, or 14,258 therms)

Revised Project Savings: 15,893 therms

The reduction in therm savings can be attributed to some of the piping being located in conditioned space as well as some piping being replaced with smaller diameter piping.

Therefore about 1,635 therms may be claimed in the child app to complete the application.

Please confirm that the incentive should remain unchanged.

Thank you for your time; I look forward to hearing from you.

[Redacted]

---

**From:** [Redacted]  
**Sent:** Friday, December 27, 2019 10:34 AM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Thank you very much.

[Redacted] 5

---

**From:** [Redacted]  
**Sent:** Monday, December 23, 2019 4:43 PM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** EXT || RE: TRAVEL LEATHER ESR NO. 102484, GAS APP NO. 10463294

Good Afternoon [Redacted]

Please be advised that the Post Inspection for this project is now complete. I have uploaded all post inspection documentation directly to gas app. no. **10463294**.

Please feel free to let us know if any additional information/clarification is needed.

Thank you,

[Redacted]

REDACTED

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The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
Attachment PUC 3-5-11 (Redacted)  
Page 3 of 3

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To: [REDACTED]  
Sent: Thur 1/11/2018 3:50:10 PM (UTC)  
Subject: RE: Please do not create RI Incentive Payments...

Thank you both!

---

From: [REDACTED]  
Sent: Thursday, January 11, 2018 10:49 AM  
To: [REDACTED]  
Subject: RE: Please do not create RI Incentive Payments...

Yes. We chatted yesterday & she is holding the payment.

Thank you,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 11, 2018 10:48 AM  
To: [REDACTED]  
Subject: RE: Please do not create RI Incentive Payments...

Hi,

I would not process the payment until next week but let me confirm with [REDACTED]

[REDACTED] should [REDACTED] hold off on payment on the application she has outlined below?

Thank you,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 11, 2018 10:47 AM  
To: [REDACTED]  
Subject: RE: Please do not create RI Incentive Payments...

Hi - I just want to confirm whether or not I should pay this open RI application – it was being watched closely. I wasn't sure if it was still being included in the forecast since it was posted by 12/31.

6911935 Ocean State Job Lot - Perf Ltg  
Gross Annual kWh Savings 1,666,525 kWh

---

From: [REDACTED]  
Sent: Wednesday, January 03, 2018 9:12 AM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Please do not create RI Incentive Payments...

Hi,

[REDACTED] has asked that we hold off on creating any more RI Incentive payments for 2017 for now. She will let us know when we can begin again.

Thank you,

[REDACTED]

To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
Sent: Wed 1/15/2014 5:45:01 PM (UTC)  
Subject: RE: 2014 Oil and Propane Weatherization payments

Awesome thank you.

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 12:43 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: 2014 Oil and Propane Weatherization payments

Ok...I am on it...**RequestID: 00006918**

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 12:18 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: 2014 Oil and Propane Weatherization payments

Theoretically yes, but some setup would be required first. We would need to create a new upload group that pointed to the new accounting string. If you want Ankit to get started on this, please create a WRS ticket. Thanks.

- [REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 12:13 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: 2014 Oil and Propane Weatherization payments

Hi [REDACTED]  
I believe we have the accounting strings for the OIL/Propane/Wood for the RGGI funds but no funds yet. (correct me if I am wrong on the accounting strings). Can RISE issue and upload the work packages for these into indemand and we just wait to pay them?

Thanks,

[REDACTED]

---

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 11:06 AM  
To: [REDACTED]  
Subject: 2014 Oil and Propane Weatherization payments

Hi [REDACTED] thank you for the meeting yesterday. Learning that we are at 215% of our electric goal and 170% of gas for 2013 was the highlight of my day.

Just following up on the request to hold off on billing oil and propane weatherization (similar to last year) in 2014. Can you please check to see if we would still able to upload and process the payments through indemand but you would just hold off on approving those individual invoices tied to that accounting string. Or if we need to hold off uploading until the money from the State is made available.

Thanks

[REDACTED]



\*\*\*\*\*

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To: [REDACTED]  
From: [REDACTED]  
Sent: Fri 1/20/2017 1:37:50 PM (UTC)  
Subject: RE: EXT || Unpaid RISE Invoices

Ok no problem, thank you both!

[REDACTED]

---

From: [REDACTED]  
Sent: Friday, January 20, 2017 8:05 AM  
To: [REDACTED]  
Subject: RE: EXT || Unpaid RISE Invoices

Hi [REDACTED]

These should be all set. [REDACTED] is going to double check. Anytime you see payment pulled it means that we have paid it on our end and it is now processing in the financial system. The ones listed as payment complete should have already been received by you. We had to hold some invoices for year-end reasons but are back to the standard processing mode.

Thanks,

[REDACTED]

---

From: [REDACTED]  
Sent: Thursday, January 19, 2017 5:45 PM  
To: [REDACTED]  
Subject: EXT || Unpaid RISE Invoices

[REDACTED] & [REDACTED]

We have not been paid for the following invoices. Do you need any additional information from us in order to process?

In your system the invoice status's are listed as:

- 149986 payment completed 01/14/2017
- 149987 payment was pulled yesterday 01/18/2017
- 149988 payment was pulled yesterday 01/18/2017

What does Payment Pulled mean?

Thanks,

[REDACTED]

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REDACTED

To: [REDACTED]

Cc: [REDACTED]

From: [REDACTED]

Sent: Tue 11/22/2016 8:10:04 PM (UTC)

Subject: RE: EXT || RE: Email Blasts

Hi,

Yes, this is possible. How many customers should we e-mail the week of 11/28? How many customers should we e-mail the week of 12/5? Do we want to prioritize customers who we know have gas heating from us? Thanks so much for your help.

Happy Thanksgiving!

Sincerely,

[REDACTED]

---

From: [REDACTED]

Sent: Tuesday, November 22, 2016 2:42 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: EXT || RE: Email Blasts

Hi [REDACTED]

Is [REDACTED] request possible?

[REDACTED]

---

From: [REDACTED]

Sent: Tuesday, November 22, 2016 2:28 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: EXT || RE: Email Blasts

Hi [REDACTED]

We currently have a backlog of +/- 700 so we could use a little bump now. Do you think we could send out some emails the weeks of 11/28 and 12/5 to ensure full schedules then do the remainder after the new year? I feel like anything mailed out mid December is going to get trumped by holiday hustle and bustle.

[REDACTED]

[REDACTED]

---

From: [REDACTED]

Sent: Tuesday, November 22, 2016 2:09 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Email Blasts

Hi [REDACTED] & [REDACTED]

RI Home Energy Assessment e-mails blasts were intended to go out in October and November, but there were issues with the data center and it took several weeks to get the e-mail list from the Data team. If we want to send them out, it would be the weeks of 11/28 and into December or we can save them and send in early 2017. I wanted to get an understanding of your current backlog and if it makes sense to wait since we may need to hold invoices. At the same time I want to make sure we have steady production lined up.

Thoughts?

[REDACTED]

[REDACTED]

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To: [REDACTED]  
 From: [REDACTED]  
 Sent: Sat 1/23/2021 12:08:24 AM (UTC)  
 Subject: FW: RI Electric 2020 IMPORTANT KEEP

From: [REDACTED]  
 Sent: Tuesday, September 8, 2020 4:50 PM  
 To: [REDACTED]  
 Cc: [REDACTED]  
 Subject: RI Electric 2020

Hi all, notes from the conversation today to reduce spending. [REDACTED] I've added you into the email thread.

Sales reps review the most recent pipeline report ([REDACTED] sent today)

1. Determine what projects need to stay in 2020 due to customer receiving tax break or they need the incentive to hit their 2020 books. Move ECD out to 2021 what doesn't have that requirement
2. Look at December projects - what can be moved to ECD of 2021. Push those.
3. Projects under a \$/kwh threshold stay in. Above the threshold need to be pushed out to 2021
  - a. **Action:** [REDACTED] please refresh our memories: **What is the baseline/threshold \$/kwh they can offer. Please provide by Wednesday 9/9.**
4. Move any uncommitted app to 2021, if it can be done.
5. Move any committed by us, but not committed by the customer (waiting for customer to sign offer letter) to 2021.
6. **Action:** Sales to complete this exercise by end of this week
7. **Action:** Pete to ask Jerry specifically about those projects in [REDACTED] queue.

Additional discussion with CEM to happen mid week.

**Action:** [REDACTED] to share range of forecasts with CEM this week for both Gas and Electric  
 Electric spend forecast  
 min = 94%, Max 106% - but goal is 100% spending  
 savings forecast  
 min =66%, Max 81%

[REDACTED]

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Please consider the environment before printing this email.

**Organizer:** [REDACTED]

**From:** [REDACTED]

**Attendees:** [REDACTED]

**Location:** 1-866-844-9417, 72882852 or W3.833 Freeport

**Importance:** Normal

**Subject:** Year End Accrual Follow Up -- How to track?

**Start Time:** Tue 12/17/2013 2:00:00 PM (UTC)

**End Time:** Tue 12/17/2013 3:00:00 PM (UTC)

**Required Attendees:** [REDACTED]

When: Tuesday, December 17, 2013 9:00 AM-10:00 AM (GMT-05:00) Eastern Time (US & Canada).  
 Where: 1-866-844-9417, 72882852 or W3.833 Freeport

\*~\*~\*~\*~\*~\*~\*~\*~\*~\*

This is to discuss how to track the jobs that are accrued as "install complete" or "construction complete" that then do not have a post-inspection completed by 12/31/14 because we don't want to count those to 2013 goal. We may not want them to become "payment authorized" by 1/31/14 (or have savings paid date reverted to 12/31/13). This is a follow up to today's meeting with RA group.

I am working from home, I will open the call-in from there. There is a room for those at Rez Woods if you'd prefer in person.

Please forward to anyone I may have missed.

[REDACTED] may not be able to join us, I will send notes after.

REDACTED

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**From:** [REDACTED]  
**Sent:** Tue 1/16/2018 6:45:32 PM (UTC)  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Thanks [REDACTED]

I am holding Rockcliff Farm Condominiums (invoice 132586) to pay in 2018.

For app # 7161380, Scenic View II Condos, I see this paid date: 10/04/2017. I can ask the InDemand team if they have any insights.

Thanks!

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, January 16, 2018 1:38 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Hi -

There are 2 resi MF projects that RISE has but NGrid SBM doesn't:  
Rockcliff Farm condos: 2,056 therms  
Scenic View condos: 586 therms

And NGrid has 28 therms more savings for Homestead Mills

Otherwise, there are small therm differences between RISE & SBM data, probably rounding errors, so essentially we're on the same page for the rest of the resi MF projects.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 4:56 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Thanks, [REDACTED] Meaning, the Indemand Resi MF savings data is also correct?

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 4:30 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

The 2017 MF C&I gas savings are coming through correctly, as far as I can tell.

The discrepancy between RISE & InDemand savings values appear to be due to RISE entered savings updates made to InDemand that have not yet been made to the RISE summary information, where the main discrepancies are at Rolling Green Village (3,100 therms) and Sandy Lane Apartments (3,760 therms).

██████████

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:39 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

Yes - this program experienced a huge hockey stick this year.

It is a small program, and any one project can have a significant impact on savings and spend. In past years, some projects have not completed by year-end, so I went with a conservative forecast.

However, the fact that the sum-by-month and RISE data are very different is unexpected. I have asked RISE to provide a list of all projects, to help with doing a comparison.

██████████

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:35 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

██████████

The BO Report I pulled yesterday may be helpful. It shows that C&I Multifamily Gas achieved about 14,000 Therms of savings from Jan - Nov and then an additional 80,000 Therms in the month of December alone. Hope that helps.

Best,  
██████████

<< File: DSM EVAL %28011-G%29 Sum By Month Gas (4).xls >>

██████████

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:30 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?

██████████

Thanks so much for tackling this quickly. Please let us know if you do find anything.

██████████

---

**From:** ██████████  
**Sent:** Thursday, January 11, 2018 2:22 PM  
**To:** ██████████  
**Cc:** ██████████  
**Subject:** RE: quick check of InDemand impacts? Is the 200% C&I Gas correct?



[REDACTED] -

I don't see anything obviously strange in the impacts [REDACTED] sent to me 12/27/17, but I asked him to send me a query of supporting project information and impacts so I can review / hand calculate what the savings should be. [REDACTED] message yesterday was concerned with a smaller discrepancy, so my guess is most of the jump from 30% to 200% was based on projects completing, but I will let everyone know what I find.

[REDACTED]

From [REDACTED] yesterday afternoon:  
Hi [REDACTED]

The Sum By Month shows much higher numbers than RISE for RI MF Comm Gas and RI MF Gas.

The RISE info is attached.

Here is the SBM info.

RESI Gas - 106,618 net annual therms or 93% (RISE shows 94,129)

Comm Gas - 94,420 net annual therms or 213% (RISE shows 87,719)

While the Sum By Month often shows slightly higher numbers, these discrepancies seem too large. Can you please help me look into this?

---

**From:** [REDACTED]  
**Sent:** Thursday, January 11, 2018 2:09 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** quick check of InDemand impacts? Is the 200% C&I Gas correct?  
**Importance:** High

[REDACTED]

Have you had a chance to double check that the impacts are correct in MF C&I Gas? The jump from 30% in the projections to 200% on the scorecard surprised me yesterday and I did want to confirm it was not an InDemand error.

Just had a meeting with [REDACTED] & [REDACTED] and this is super high priority on the C&I sector and they want to ensure that the savings are correct. Fred did mention that Jeff pushed on C&I gas jobs as part of a gap closer, so the savings jump may be actual - just not forecasted.

Can you let all know on this chain because there's a lot of moving pieces on this.

Thanks,  
[REDACTED]

To: [REDACTED]  
From: [REDACTED]  
Sent: Mon 12/28/2015 7:20:10 PM (UTC)  
Subject: FW: RI incentive payments

I don't think this will affect you, just wanted to let you know 😊

---

From: [REDACTED]  
Sent: Monday, December 28, 2015 2:03 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: RI incentive payments

Please see below,

Do not make any payments or request for payments for RI !!!

Until further notice.

Thanks

[REDACTED]

[REDACTED]

---

From: [REDACTED]  
Sent: Monday, December 28, 2015 1:58 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RI Incentive payments

Afternoon guys,  
Hope everyone had a good Christmas, or if you're not into Christmas, at least a good long weekend.

Until further notice, please don't pay/approve any incentive payments in RI. We're pretty good on goal, we're over on budget, and I'd like to take stock of where things stand before potentially pushing us into a bad place from a budget perspective. The accruals should give us plenty of latitude to make payments should we need to.

Thanks much,  
GB

[REDACTED]

[REDACTED]

REDACTED

To:

Cc:

From:

Sent: Sun 6/2/2019 7:39:09 AM (UTC)

Subject: RI ; Gas/LI

Good Morning Gentlemen,

There are some concerns with the numbers coming in for Gas in Rhode Island, at the overall portfolio level. Not our program, but how the line items for all roll up. Since we are so successful... 😊

With the addition of the Cozy project for [REDACTED] we really need to scrub the numbers as far as what we can/should pay through year end to keep us in check and not go over our stretch goals. Specifically in the Low Income sector. With the numbers you shared yesterday, we are going to be really close to going over those lines.

Things being discussed – holding some invoices for payment until January, to allow the invoices to accrue, but not physically be paid until 2019. Hand picking projects to be paid, to be held. This is all still under discussion, but wanted to provide a heads up to you so we can start to think about this, should we be asked to do so. Example ; if we have to have the Cozy project in, is there something we should shuffle out to next year? Etc..

Let me know if you have any questions, concerns, more to come as we move things along.  
Thank you!

PUC Post-Decisional 3-6

Request:

Referencing page 6 of the Review, please produce a list of all of the “search terms and key words specific to Rhode Island energy efficiency as well as terms designed to identify potential misconduct or fraud” that were used to search the email collection set.

Response:

Please see Attachment PUC 3-6.

Search Term List

| Seq. | Search Term                          | Seq. | Search Term                                                          |
|------|--------------------------------------|------|----------------------------------------------------------------------|
| 1    | "Defer billing**"                    | 75   | Exceed* w/5 MOU                                                      |
| 2    | "Deferred billing**"                 | 76   | Invoice AND Stack                                                    |
| 3    | Defer w/5 billing*                   | 77   | Deceit                                                               |
| 4    | Deferred w/5 billing*                | 78   | Deceive                                                              |
| 5    | "Reduce expense**"                   | 79   | Fraud AND NOT ("WIRE FRAUD ALERT")                                   |
| 6    | Reduce w/5 expense*                  | 80   | Manipulate                                                           |
| 7    | ("Claim saving**") w/7 Year          | 81   | Auditor w/5 hide                                                     |
| 8    | ("Claim saving**") w/7 Rebate        | 82   | Auditor w/5 conceal                                                  |
| 9    | ("Claim saving**") w/5 Hold          | 83   | Auditor w/5 lie                                                      |
| 10   | ("Claim saving**") w/5 Defer         | 84   | Auditor w/5 "do not tell"                                            |
| 11   | "Urgent data"                        | 85   | Auditor w/5 ("don't tell")                                           |
| 12   | "Work together"                      | 86   | Auditor w/5 ("dont tell")                                            |
| 13   | "Push toward"                        | 87   | Deloitte                                                             |
| 14   | "Hard stop"                          | 88   | Move w/3 invoices                                                    |
| 15   | "Need to manage"                     | 89   | Scal* w/1 back                                                       |
| 16   | "Slowing invoice**"                  | 90   | Goal w/5 over                                                        |
| 17   | "Cheaper incentive**"                | 91   | Goal w/5 get                                                         |
| 18   | "Hold over"                          | 92   | Goal w/5 100                                                         |
| 19   | "Our favor"                          | 93   | Goal w/5 want                                                        |
| 20   | "Locked in"                          | 94   | Goal w/5 enough                                                      |
| 21   | 100 w/3 spend                        | 95   | Goal w/5 exceed*                                                     |
| 22   | (Invoice* w/5 pending) AND EFI       | 96   | Penalt* w/5 Over                                                     |
| 23   | "Hold them"                          | 97   | Penalt* w/5 Regulatory                                               |
| 24   | ("Claimed saving**") AND Goal        | 98   | Penalt* w/5 Cost                                                     |
| 25   | ("Forecasted saving**") AND Forecast | 99   | Penalt* w/5 Budget                                                   |
| 26   | "Not" w/5 Accrued                    | 100  | Penalt* w/5 Saving*                                                  |
| 27   | "Not" w/5 Posted                     | 101  | Penalt* w/5 Performance                                              |
| 28   | "Leave no"                           | 102  | "Accrual procedure" >>> <i>Time period contrained to 2017-onward</i> |
| 29   | "Leave no money"                     | 103  | Outstanding w/1 invoice                                              |
| 30   | "Maximizing saving**"                | 104  | Exceed* w/5 Over*                                                    |
| 31   | "Maximize saving**"                  | 105  | Exceed* w/5 Budget                                                   |
| 32   | "Close eye"                          | 106  | ("Next Year") AND Budget                                             |
| 33   | "Goal to be"                         | 107  | ("Next Year") AND Invoice                                            |
| 34   | Hold w/5 invoice*                    | 108  | ("Next Year") AND Exceed                                             |
| 35   | ("Don't allow") AND Invoice*         | 109  | ("Next Year") w/5 MOU                                                |
| 36   | "Do not allow" AND Invoice*          | 110  | Overspent                                                            |
| 37   | Billing* w/5 Delay                   | 111  | "running start"                                                      |
| 38   | Hold* w/5 invoice*                   | 112  | Decide w/5 invoices                                                  |
| 39   | Budget* AND ("Keep an eye")          | 113  | Decision w/5 invoices                                                |
| 40   | Goal* AND ("Keep an eye")            | 114  | Budget* w/5 Pay*                                                     |
| 41   | Saving* AND ("Keep an eye")          | 115  | Budget* w/5 *Accru*                                                  |
| 42   | Invoice* AND ("Keep an eye")         | 116  | Defer w/5 Invoice                                                    |
| 43   | Spend AND ("Keep an eye")            | 117  | Defer w/5 Pay*                                                       |
| 44   | Bill* AND ("Keep an eye")            | 118  | Exceed w/5 Forecast                                                  |
| 45   | Budget* AND ("Keep a close eye")     | 119  | Ding* w/5 Over                                                       |
| 46   | Goal* AND ("Keep a close eye")       | 120  | ("With hold") w/5 Invoice*                                           |
| 47   | Saving* AND ("Keep a close eye")     | 121  | Withhold w/5 Invoice*                                                |
| 48   | Invoice* AND ("Keep a close eye")    | 122  | Stop w/5 Processing                                                  |
| 49   | Spend AND ("Keep a close eye")       | 123  | Stretch                                                              |
| 50   | Bill* AND ("Keep a close eye")       | 124  | Improper w/5 Budget                                                  |
| 51   | "Maxing out"                         | 125  | Inappropriate w/5 Budget                                             |
| 52   | Stretch w/5 saving*                  | 126  | Pressure* w/5 Budget                                                 |
| 53   | ("Move them") AND January            | 127  | Pressuring w/5 Budget                                                |
| 54   | "Working thing"                      | 128  | Improper w/5 Accounting                                              |
| 55   | Dinged                               | 129  | Inappropriate w/5 Accounting                                         |
| 56   | Negative AND Shareholder             | 130  | Pressure* w/5 Accounting                                             |
| 57   | ("Hold off") w/5 Recommendation      | 131  | Pressuring w/5 Accounting                                            |
| 58   | ("Hold off") w/5 Invoice*            | 132  | Improper w/5 Saving*                                                 |

**Search Term List**

| <b>Seq.</b> | <b>Search Term</b>           | <b>Seq.</b> | <b>Search Term</b>         |
|-------------|------------------------------|-------------|----------------------------|
| 59          | ("Hold off") w/5 Accru*      | 133         | Inappropriate w/5 Saving*  |
| 60          | ("Hold off") w/5 Payment*    | 134         | Pressure* w/5 Saving*      |
| 61          | ("Hold off") w/5 Paying      | 135         | Pressuring w/5 Saving*     |
| 62          | ("Hold off") w/5 Uploading   | 136         | Improper w/5 Invoice       |
| 63          | "Monies out"                 | 137         | Inappropriate w/5 Invoice  |
| 64          | "Nice bump"                  | 138         | Pressure* w/5 Invoice      |
| 65          | "Moving back"                | 139         | Pressuring w/5 Invoice     |
| 66          | Adjust w/5 accrual*          | 140         | Improper w/5 Guidance      |
| 67          | "Not want counted"           | 141         | Inappropriate w/5 Guidance |
| 68          | "Choose to hold"             | 142         | Pressure* w/5 Guidance     |
| 69          | Compliance w/5 Appropriate   | 143         | Pressuring w/5 Guidance    |
| 70          | ("Carry over") OR Carry-over | 144         | Improper w/5 Decision      |
| 71          | Excess AND ("Next year")     | 145         | Inappropriate w/5 Decision |
| 72          | Overspend AND Lighting       | 146         | Pressure* w/5 Decision     |
| 73          | Exceed* w/5 Goal             | 147         | Pressuring w/5 Decision    |
| 74          | Exceed* w/5 Rebate           | 148         | "Gap Closer"               |

PUC Post-Decisional 3-7

Request:

Please identify and produce any document retention policy that the Company had in place at any time during 2012-2022 that related to invoices or records of the energy efficiency program.

Response:

Please see Attachment PUC 3-7.

# NATIONAL GRID

06/10/2022  
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Page 1

**Department Name:** ENERGY EFFICIENCY - LI (Formerly EL138)(DO NOT L  
**Department ID:** 0016

| <i>Record Series ID</i> | <i>Record Series Title</i>                                          | <i>Department Retention</i> | <i>Inactive Retention</i> |
|-------------------------|---------------------------------------------------------------------|-----------------------------|---------------------------|
| 191 035 H.              | SMART START REBATE APPLICATIONS - DISCONTINUED (GC)                 | ACT+3                       | ACT+6                     |
| 191 013 H.              | RESIDENTIAL ACTUAL AUDITS                                           | ACT+7                       | ACT+7                     |
| 191 010 H.              | COMMERCIAL ENERGY AUDIT PROGRAM                                     | ACT+7                       | ACT+7                     |
| 191 048 H.              | COMMERCIAL CONSTRUCTION AND GEO-THERMAL REBATES                     | ACT                         | ACT+7                     |
| 086 151 H.              | GAS & ELECTRIC HISTORICAL STUDIES                                   | ACT+5                       | HLD                       |
| 191 053 H.              | REAL TIME PRICING (RTP) - Discontinued                              | ACT                         | ACT+6                     |
| 086 032 H.              | KEYSPAN / LIPA POPULATION SURVEYS                                   | ACT+1                       | ACT+50                    |
| 191 052 H.              | RESIDENTIAL ENERGY AFFORDABILITY PARTNERSHIP (REAP)                 | ACT                         | ACT+7                     |
| 191 051 H.              | INFO ED - RESIDENTIAL INFORMATION & EDUCATION PROGRAM               | ACT                         | ACT+7                     |
| 191 055 H.              | PEAK REDUCTION PROGRAM (PRP)                                        | ACT                         | ACT+6                     |
| 191 056 H.              | SOLAR VOLTAIC REBATES                                               | ACT                         | ACT+6                     |
| 191 054 H.              | CENSUS STATISTICS                                                   | ACT                         | ACT+12                    |
| 191 047 H.              | COMMERCIAL POWER FOR JOBS CONTRACTS AND BILLING DETERMINANTS - EXPI | ACT+1                       | ACT+10                    |
| 191 046 H.              | COMMERCIAL NIGHTLIGHT / DUSK TO DAWN / LIGHT SOLUTIONS - ACTIVE     | ACT                         | ACT                       |
| 191 044 H.              | COMMERCIAL PEAK REDUCTION PROGRAM - ACTIVE                          | ACT+1                       | IND                       |
| 191 042 H.              | WASHING MACHINE REBATE PROGRAM                                      | ACT+2                       | ACT+6                     |
| 191 041 H.              | RESIDENTIAL LIGHTING & APPLIANCE REBATE PROGRAMS (RLA)- INFORMATION | ACT+1                       | ACT+6                     |
| 191 018 H.              | MULTI-FAMILY DWELLINGS AUDITS                                       | ACT+7                       | ACT+7                     |
| 191 014 H.              | COMMERCIAL ENERGY AUDITS REQUESTS                                   | ACT+7                       | ACT+7                     |
| 191 011 H.              | CENTR AIR CONDITIONER AND GEO-THERMAL REBATE PROGRAMS               | ACT+2                       | ACT+6                     |
| 191 009 H.              | COMMERCIAL MANDATORY TIME-OF-USE PROGRAM                            | ACT+2                       | ACT+7                     |
| 191 007 H.              | COMMERCIAL VOLUNTARY TIME OF USE PROGRAM                            | ACT+2                       | ACT+7                     |
| 191 006 H.              | RESIDENTIAL VOLUNTARY TIME-OF-USE PROGRAM                           | ACT+2                       | ACT+7                     |

**Total Series In Department Code:** 23

**Note:** Retention Format is ACT+ #Yrs/#Mos

ACT+ = Retention based on contents of record to date.

IND = Permanent Retention



PUC Post-Decisional 3-8

Request:

Referencing page 6 of the Review, please identify the “outside professionals” that the Company used [t]o conduct the review and identify out-of-period invoices.

Response:

The outside professionals are PricewaterhouseCoopers (“PwC”).

PUC Post-Decisional 3-9

Request:

Referencing page 6 of the Review, please identify the “forensic consultant” that worked with the Company in reviewing emails.

Response:

The forensic consultant is PricewaterhouseCoopers (“PwC”).

PUC 3-10

Request:

Please provide a copy of any reports the Company produced, received, or has done related to the Review.

Response:

Please see Attachment PUC 3-10-1 and Attachment PUC 3-10-2.

The Company is asserting legal privilege for Attachment PUC 3-10-2. Please see Motion of The Narragansett Electric Company Objecting to data request PUC 3-10 from the Public Utilities Commission ("PUC").

Notwithstanding the Company's objection, in an effort to provide the PUC with the information contained in Attachment PUC 3-10-2 without providing legally privileged documents, the Company has attached a redacted version of Attachment PUC 3-10-2. Please note the redacted Attachment PUC 3-10-2 is confidential and the Company is seeking protective treatment from public disclosure.

## Rhode Island Energy Efficiency Investigation

### EXECUTIVE SUMMARY:

This investigation focused on determining whether the “out-of-period invoice” strategy identified in the Rhode Island Residential Upstream Lighting program in program years 2017 and 2018 was widely accepted within the Rhode Island energy efficiency program; determining where the strategy was actually implemented (as opposed to simply being discussed as a potential year-end tactic); and determining whether an effect upon the Performance Incentive received by the Company could be estimated and calculated.

This investigation has established that the strategy of delaying the receipt of invoices in Rhode Island Energy Efficiency programs (“out-of-period invoices”) for purposes of staying within budget and/or savings targets was widely known and accepted within the Rhode Island Energy Efficiency program throughout the period of review (program years 2012-2020).

The strategy was known and discussed widely within the Program, and in many instances was used by program managers to delay receipt, recognition, and payment of invoices until the following program year in order to stay within certain budget and savings targets.

The investigation was able to document 48 instances where it was concluded that the strategy was implemented. These instances occurred in various programs across the review period. The investigation established additional instances where the strategy appeared to have been implemented but the program or programs in which it was implemented could not be established; or was discussed among Rhode Island Energy Efficiency personnel but it could not be established that the strategy was ever implemented.

Through interviews, extensive review and analysis of email of Rhode Island Energy Efficiency Program Managers; analysis and evaluation of the mechanisms for calculating Performance Incentives within the Rhode Island Energy Efficiency program years; and development of a Performance Incentive Model that allowed the application of “out-of-period percentages” (previously tested and calculated in the course of the preliminary investigation) to programs beyond the Residential Upstream Lighting program, the investigation has calculated a value for a net downward adjustment of Performance Incentive earned by the Rhode Island Energy Efficiency programs over the review period.

### **Purpose of Investigation:**

To determine the extent to which the “out-of-period invoice” strategy was known, accepted, and implemented within the Rhode Island Energy Efficiency program, and to estimate the potential impact, if any, on Performance Incentives received by the Company in program years 2012-2020.

### **Background: - TW Lighting**

In 2020 National Grid was made aware of an allegation that Program Managers in the Rhode Island Residential Upstream Lighting program had asked certain lighting manufacturers to withhold

submission of invoices in the 2017 and 2018 program years so that National Grid could reduce expenses and claim savings in the following years.

Internal investigation confirmed that the program managers in those years did, in fact, take steps to delay the recognition of manufacturer invoices in the Residential Upstream Lighting Program in program years 2017 and 2018.<sup>1</sup>

National Grid engaged a forensic consultant to undertake a review of out-of-period invoices in Rhode Island Residential Upstream for the program years 2016 – 2020 for purposes of quantifying the impact, if any, of these actions. The subsequent review obtained the underlying billing and documentation for the transactions involved and determined the annualized out-of-period percentages for the implicated years 2017 and 2018, as well as annualized out-of-period percentages for years 2016, 2019 and 2020. By identifying out-of-period invoice percentages, returning the associated spend and claimed savings back to the appropriate calendar year, and recalculating the Performance Incentives that would have been earned by National Grid had the invoices been received and counted in the correct year, the investigation applied the transaction-tested annualized “out-of-period percentages” for Rhode Island Residential Upstream Lighting for the years in this review, and calculated an aggregate net downward adjustment of the Performance Incentive in the amount of \$124,135.00.

The company has made a regulatory filing reporting this \$124,135.00 net downward adjustment and credit to ratepayers.<sup>2</sup>

The investigation was thereafter expanded to look at the activities of all Program Managers in Rhode Island Energy Efficiency in the program years 2012-2020.

### **Methodology:**

Through extensive review of emails, interviews of Program Managers and CEM team members, analysis of regulatory filings and filed annual program results, and application of transaction-tested “out-of-period percentages” developed in the initial investigation, the investigation was able to calculate a value of Performance Incentive received by National Grid as a result of the implementation of the “out-of-period invoice” strategy over the time period under review (2012-2020).

### **Summary of Findings:**

This investigation focused on determining whether this strategy was widely accepted within the Rhode Island energy efficiency program; determining where the strategy was actually implemented (as opposed to simply being discussed as a potential year-end tactic); and determining whether an effect upon the Performance Incentive received by the Company could be estimated and calculated. This calculation is reported as a **net downward adjustment of Performance Incentive** across the period of this review.

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<sup>1</sup> Direct contact with manufacturers was only confirmed for program year 2017

<sup>2</sup> For the purposes of this analysis and calculation, the previously reported Net Downward Adjustment has not been netted out of the calculations of the expanded investigation

This investigation has established that the strategy of delaying the receipt of invoices in Rhode Island Energy Efficiency programs was widely known and accepted within the Rhode Island Energy Efficiency program throughout the period of review (program years 2012-2020).

The strategy was known and discussed widely across all sectors, and in many instances was used by program managers to delay receipt, recognition, and payment of invoices until the following program year in order to stay within certain budget and savings targets.

The investigation was able to identify 29 email exchanges where it was concluded that the strategy was implemented. This identified 48 instances across a number of programs in a number of program years through the review period where the investigation concluded that the strategy was utilized.

The investigation identified a number of additional email exchanges where the strategy was discussed, but the specific program or programs in which it was implemented could not be established; or where the strategy was discussed among Rhode Island Energy Efficiency personnel, but it could not be established that the strategy was ever implemented.

Through interviews, extensive review and analysis of email of Rhode Island Energy Efficiency Program Managers; analysis and evaluation of the mechanism for calculating Performance Incentives within the Rhode Island Energy Efficiency program years; and development of a model that allows the application of previously tested and calculated “out-of-period percentages” to programs beyond the Residential Upstream Lighting program, the investigation has calculated a **net downward adjustment of Performance Incentive** received by the Company across the period of this review (2012-2020).

#### **Discussion:**

- **E-mail Review:**

Commencing in September of 2021, the investigation developed a roster of all National Grid employees who worked as program managers in New England Energy Efficiency programs. A list of the programs they managed in each year of the study was compiled. The available email for the program managers for every year of the review period (2012-2020) was collected. The collection set included approximate 500,000 emails.

In consultation and coordination with the forensic consultant, an extensive email review was commenced, using search terms and key words specific to Rhode Island Energy Efficiency as well as terms designed to identify potential misconduct and fraud. The search was designed and conducted to locate email that related to any improper or inappropriate activity including the out-of-period invoicing strategy. Over the remainder of 2021 and through January of 2022, email sets were reviewed and evaluated in order to determine responsiveness of the samples and to refine the continued analysis of the email collection.

By February of 2022 the investigation had developed a responsive set of email that showed Program Managers, across sectors, programs, measures and years, openly discussing the strategy of holding off on the receipt and payment of invoices at the end of program years.

Further analysis of the data set was performed to determine any patterns or concentrations of these strategies, ie: were they limited to residential programs, or to programs in the Electric sector, or to certain years, or to certain Program Managers, etc. No such limiting patterns could be identified other than the fact that more responsive email were found in the latter years of the review period than earlier – it could not be ruled out that this concentration was related to the greater availability of more recent email than email from 5-10 years ago.

The responsive emails were then analyzed by identifying the involved program managers to determine which program managers represented the greatest volume of responsive email across the broadest groups of sectors, programs and measures. The program manager sets were then evaluated for purposes of interviews to obtain the broadest view of the pervasiveness of the strategy and its use in the Rhode Island Energy Efficiency programs.

- **Program Manager Interviews:**

Beginning in February of 2022, interviews of program managers were commenced. Interviews included program managers in Residential and Commercial programs, with responsibilities in both Electric and Gas sectors. It was quickly confirmed that the out-of-period invoice strategy was widely known, frequently discussed, and many times was implemented and used by program managers to stay within budget and savings targets.

Program Managers were aware of what was described as a “sweet spot” - a combination of performance against budget targets and savings targets – which they understood represented the best influence on the Performance Incentives earned by the Company at the end of the program year.

Program managers also were aware that once “savings” reached the caps in a given program year, they no longer served to increase performance incentives. This was described by program managers as “wasting” savings.

In contrast to the initial investigation stemming from the TW Lighting matter, program managers were forthright in discussing the out-of-period invoicing strategy during the interviews, describing it as well accepted and openly discussed and considered. There was no hedging, prevaricating or obfuscation in these interviews. The Program Managers also emphasized, without prompting, that it has been made clear that this strategy is unacceptable and prohibited and that this has been made clear to Program Managers. “We wouldn’t send those emails now”, “We would not do that now”, and “It’s been made clear now that this is not acceptable” was a common refrain.

Based upon the emails in the interview sets, however, the interviewed program managers were not able to confirm for certain that invoices were delayed out of period in any given program or any given year. Often, the email discussions about the strategy did not result in actual implementation of the strategy, for instance where transactions “in the pipeline” did not ultimately exceed budget, or commercial installations could not be completed and final

inspected by year-end. Without a full set of data and documents – invoices, accruals, scorecards, etc. – certainty on a given set of transactions could not be obtained. It was determined, however, that in many instances, the responsive emails openly described the application of the strategy to specific programs, or to programs which could be identified.

- **Performance Incentive Model:**

Having established that the out-of-period invoice strategy was a widely known, widely accepted and widely discussed strategy, the investigation turned to developing a deeper understanding of how the Program Managers’ performance against budget targets, savings caps and “sweet spot” calculations actually translated into and affected Performance Incentives earned by the Company after a program year given that there is no direct relationship between the two.

Interviews of analysts in CEM provided insight and understanding into the way in which the Performance Incentive Mechanism worked in the Rhode Island Energy Efficiency programs in the years included in the review period<sup>3</sup>. The interaction of budget targets, savings targets, thresholds and caps for savings, and the yield curve of performance incentive up to 100% of budget as opposed to the flatter curve above 100% of budget was explored. This examination bore out the statement made in an interview that “savings” targets and budget performance were not a direct predictor of Performance Incentive.

Further evaluation of the tables in the actual regulatory filings allowed the identification of “levers” in each program that linked budget dollars / units of savings to realized Performance Incentive dollars. This model made it possible to apply the as-tested out-of-period percentages to any individual program in any given year and to recalculate the performance incentive that would have been realized had invoices been recognized in the proper year.

Where a program was identified as having implemented the out-of-period invoice strategy in a given year, the applicable out-of-period percentage was taken from the following year and returned to the program year where the strategy was implemented. This intricate model made it possible to recalculate performance incentives for the entire review period once specific programs and specific program years were identified. The model follows the methodology used in the recalculation of the effect on Performance Incentive of the original Residential Upstream Lighting investigation, and expands the interrelationships of the programs, and their individual budget and savings results, to allow for calculation based upon implementation of the out-of-period invoice strategy in any program in any sector, Electric or Gas.

- **“Sweet Spot”:**

The concept of a “sweet spot” sitting at something less than full budget with greater than 100% of savings targets was explored. The interaction of the performance of the various programs which made up a sector was also explored. The interviews suggested a potential “sweet spot”

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<sup>3</sup> The Performance Incentive mechanism has been changed for program year 2021



of 94% of budget and > 100% of savings which would maximize the yield curve of the budget spend and achieve the additional yield on savings.

The regulatory filings for Rhode Island Energy Efficiency for the years in the review period were also examined. By analyzing the tables for each year showing the budget and savings results for programs, the investigation sought to identify the programs where the out-of-period invoice strategy likely was employed, focusing on the programs that finished at or near a “sweet spot”

The investigation determined that “sweet spot” alone was not an accurate identifier of a program that may have implemented the out-of-period invoice strategy. Comparing the programs’ year end results to the programs that were identified in emails revealed that some identified programs were not programs which finished near a “sweet spot”. It was concluded that identification of suspect programs / program years simply by analysis of the final budget/savings numbers was not a reliable predictor.

- **Out-Of-Period Invoice Programs:**

The investigation turned back to the effort to identify programs where the out-of-period invoice strategy use could be confirmed.

Through additional detailed examination of email, the investigation was able to identify 29 email exchanges where it was concluded that the email explicitly demonstrated that the strategy was implemented. This implicated 48 instances across a number of programs across the review period where the investigation concluded that the strategy was utilized.

The investigation identified a number of additional email exchanges where the strategy was discussed; and focused on email exchanges where the strategy appeared to have been implemented, but the program or programs in which it was implemented could not be established; or where the strategy was discussed among Rhode Island Energy Efficiency personnel, but it could not be established that the strategy was ever implemented. Without explicit demonstration that the strategy was implemented in a specific program, the email suggested that any of the multiple programs managed by the program managers involved in the email discussions in a given year might be implicated. This encompassed an additional 33 instances.

- **Recalculation of Performance Incentives:**

The Performance Incentive Model was used to apply the as-tested out-of-period percentages to the programs identified above to calculate the effect upon Performance Incentives for the entire test period.

A number of different calculations were performed against the reported performance of the programs established to have implemented the strategy and programs suspected of having implemented the strategy. Where the results were too speculative, and tended to skew in favor of the company, the results were deemed unreliable.

The calculations made use of the transaction-tested out-of-period percentages developed in the initial investigation:

- For the programs which fell within the years where actual yearly out-of-period percentages were calculated (2016-2020), the actual as-calculated percentage for that year was applied (ranging from 13% in 2017 to 23.94% in 2018). For the programs which fell within years where the initial analysis did not have actual as-calculated percentages for that year, the average of the calculated out-of-period percentages (16.58%) was applied (the “actuals-average” method.)
- The calculations were also run with the straight average (16.58%) of the transaction-tested out-of-period percentages (the “straight average” method) applied to all instances.
- The calculations were also run with the combination of actual as-calculated percentages for the original investigation years, and a maximum calculated out-of-period percentage (23.94% from 2018) for all other years (the “actuals - highest percentage” method).

The calculation method also mirrored the method used to calculate the values in the initial investigation – for each program that was deemed to have implemented the out-of-period invoice strategy, the applicable percentage was applied and that amount of spend/savings was taken from the following year and returned to the previous year. Once each program had the applicable percentage applied and returned to the previous year, the Performance Incentive Model was run to recalculate the Performance Incentives that should have been earned had the spend/savings been counted in the correct year.

The investigation concluded that the most reliable indicator of the increased Performance Incentive received by the Company in the Rhode Island Energy Efficiency Program over the review period of 2012-2020 was the application of the “actuals-average” method, as this used the actual calculated percentages in the applicable years and minimized the effect of over counting or undercounting out-of-period invoices in the years where actual percentages were not available<sup>4</sup>.

- **Recalculation applied to specifically-identified programs:**  
As set forth above, the detailed email review identified 48 instances across the review period where the investigation concluded that the out-of-period invoice strategy was implemented. These instances occurred in a number of programs across the review period. The programs are listed in the chart at the conclusion of this report, and occurred in both Gas and Electric Portfolios, across all sectors, in multiple programs and throughout the review period.

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<sup>4</sup> For the purposes of this analysis and calculation, the previously reported Net Downward Adjustment has not been netted out of the calculations of the expanded investigation

- When the Performance Incentive Model was run using the “actuals-average” method, the effect upon Performance Incentive of these 48 instances was calculated at a **net downward adjustment of \$1,400,423.00**.
- When the Performance Incentive Model was run using the “straight average” method, the effect upon Performance Incentive of these 48 instances was calculated at a **net downward adjustment of Performance Incentive of \$1,569,887.00**. The investigation concluded that the “straight average” method was imprecise as it overstated the out-of-period percentages in 3 of the years where we had actual transaction-tested percentages (2016, 2017 and 2020) and understated the out-of-period percentages in 2 of the years where we had actual transaction-tested percentages (2018 and 2019). Because the Performance Incentive calculations include caps on savings and declining yield curves on performance against budget, inaccurate calculations can be obtained if programs were credited with more spending and savings than they had actually achieved, causing some programs to actually appear to do better, and pushing programs already close to their “caps” over those limits.
- When the Performance Incentive Model was run using the “actuals – highest percentage” method, the effect upon Performance Incentive of these 48 instances was calculated at a **net downward adjustment of Performance Incentive of \$2,194,339.00**. The “highest percentage” method was also determined to be imprecise as it was concluded that it was unlikely that all programs in the untested years were consistently delaying recognition of 23.94% of their budget, especially given the programs’ ability to set budgets on a yearly basis. As demonstrated by the transaction tested calculations, the “highest percentage” was an anomaly in the transaction testing.
- **Recalculation applied to additional non-specific programs:** As set forth above, the detailed email review identified additional emails where the holding of invoices was discussed, but the particular program could not be identified. The investigation attempted to include the additional programs in the calculations however, the inability to determine what program, if any, was actually subjected to the out-of-period invoice strategy, and the inability to confirm in a number of instances whether the strategy was actually implemented, rather than simply discussed, injected a significant amount of inaccuracy and lack of certainty into the calculations. Where a program manager was involved in these exchanges, but was managing multiple programs in that program year, it was not possible to determine which program or programs would have been affected. All told, the additional email exchanges could have impacted up to 33 additional program/instances and there was no evidence developed in the investigation to support a finding that a program manager ever implemented the out-of-period invoice strategy on every program he or she managed in a program year.

There was no way to calculate all the millions of permutations of combinations of these multiple programs. Different combinations were attempted (ie, programs a Program Manager was

known to have implemented from the 48 specific programs above; programs managed only by program managers involved in the 48 programs above; all programs managed by all program managers in these email exchanges) but in each case the calculation of net downward adjustment of Performance Incentive actually resulted in a lower value. The results supported the conclusion that programs which were not part of the out-of-period invoice strategy were actually being artificially enhanced by receiving an influx of invoices from the following year and were actually appearing to do better than they actually had done, and thus reducing the aggregate value of the downward adjustment of Performance Incentive. In light of the inaccuracies and uncertainty created by the inability to identify specific programs, and the fact that the calculations skewed in favor of the Company by lowering the resulting value, the investigation determined that these calculations were not accurate.

- **Allocations:**

The attached chart identifies the programs and program years in which the investigation has concluded the strategy of out-of-period invoicing was actually implemented. The programs have been identified by Program Year, Portfolio, Sector and Program. For purposes of any net downward adjustment credits, the pro-rata allocation to each sector was calculated on that program’s actual implementation expense and then grouped by Sector.

| <u>Portfolio</u> | <u>Sector</u>              | <u>Implementation Expense</u><br><u>(\$000)</u> | <u>Pro Rata %</u> |
|------------------|----------------------------|-------------------------------------------------|-------------------|
| Electric         | Commercial & Industrial    | \$62,101                                        | 34.38%            |
| Electric         | Non-Low Income Residential | \$54,816                                        | 30.35%            |
| Electric         | Low Income Residential     | \$19,666                                        | 10.89%            |
|                  |                            |                                                 |                   |
| Gas              | Commercial & Industrial    | \$19,632                                        | 10.87%            |
| Gas              | Non-Low Income Residential | \$13,838                                        | 7.66%             |
| Gas              | Low Income Residential     | <u>\$10,570</u>                                 | <u>5.85%</u>      |
|                  |                            | \$169,918                                       | 100.00%           |

- **Recommendations:**

- The calculation of Net Downward Adjustment of Performance Incentive applying the “actuals-average” method to the 48 specifically identified programs is the calculation that hews most closely to the facts developed in the investigation. It uses the actual calculated out-of-period percentages for the specific program years for which they were calculated and applies the average of these calculated percentages to years in which specific percentages have not been calculated. It avoids the uncertainty of including additional programs that cannot be proven to have applied the strategy and avoids the more favorable calculation that results from that uncertainty.
- The actual results for 2021 should take into consideration the finding that 4 programs applied the out-of-period invoice strategy in 2020. It should be confirmed that no

invoices from those programs that should have been recognized in 2020 are included in the final budget and savings results for 2021 when calculated for filing.

Rhode Island Energy Efficiency Investigation - Allocations

| Seq                                 | Year | Utility  | Sector                     | Program                                  | Actual Implementation Expenses (\$000) | Actual Implementation Expenses, % |
|-------------------------------------|------|----------|----------------------------|------------------------------------------|----------------------------------------|-----------------------------------|
| 1                                   | 2012 | Electric | Non-Low Income Residential | Residential New Construction             | \$1,259                                | 0.70%                             |
| 2                                   | 2013 | Electric | Commercial & Industrial    | Large Commercial New Construction        | \$8,625                                | 4.78%                             |
| 3                                   | 2013 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | \$7,854                                | 4.35%                             |
| 4                                   | 2013 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | \$2,519                                | 1.32%                             |
| 5                                   | 2013 | Gas      | Non-Low Income Residential | EnergyWise                               | \$4,530                                | 2.51%                             |
| 6                                   | 2015 | Electric | Low Income Residential     | Single Family - Income Eligible Services | \$7,068                                | 3.91%                             |
| 7                                   | 2015 | Electric | Low Income Residential     | Income Eligible Multifamily              | \$2,320                                | 1.28%                             |
| 8                                   | 2015 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | \$1,844                                | 1.02%                             |
| 9                                   | 2015 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | \$3,227                                | 1.79%                             |
| 10                                  | 2016 | Electric | Commercial & Industrial    | Large Commercial New Construction        | \$5,417                                | 3.00%                             |
| 11                                  | 2016 | Electric | Commercial & Industrial    | Large Commercial Retrofit                | \$19,719                               | 10.92%                            |
| 12                                  | 2016 | Electric | Commercial & Industrial    | Small Business Direct Install            | \$6,994                                | 3.87%                             |
| 13                                  | 2016 | Electric | Low Income Residential     | Income Eligible Multifamily              | \$2,067                                | 1.14%                             |
| 14                                  | 2016 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | \$1,170                                | 0.65%                             |
| 15                                  | 2016 | Electric | Non-Low Income Residential | EnergyWise                               | \$6,906                                | 4.93%                             |
| 16                                  | 2016 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | \$7,706                                | 4.27%                             |
| 17                                  | 2016 | Electric | Non-Low Income Residential | Residential Consumer Products            | \$1,706                                | 0.94%                             |
| 18                                  | 2016 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | \$1,664                                | 0.92%                             |
| 19                                  | 2016 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | \$3,740                                | 2.07%                             |
| 20                                  | 2016 | Gas      | Commercial & Industrial    | Small Business Direct Install            | \$134                                  | 0.07%                             |
| 21                                  | 2016 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | \$580                                  | 0.32%                             |
| 22                                  | 2016 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | \$1,253                                | 0.69%                             |
| 23                                  | 2016 | Gas      | Non-Low Income Residential | Residential New Construction             | \$847                                  | 0.47%                             |
| 24                                  | 2017 | Electric | Low Income Residential     | Single Family - Income Eligible Services | \$8,211                                | 4.55%                             |
| 25                                  | 2017 | Electric | Non-Low Income Residential | Residential New Construction             | \$1,142                                | 0.63%                             |
| 26                                  | 2017 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | \$1,587                                | 0.88%                             |
| 27                                  | 2017 | Electric | Non-Low Income Residential | EnergyWise Multifamily                   | \$2,039                                | 1.13%                             |
| 28                                  | 2017 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | \$6,966                                | 4.96%                             |
| 29                                  | 2017 | Electric | Non-Low Income Residential | Residential Consumer Products            | \$2,307                                | 1.28%                             |
| 30                                  | 2017 | Gas      | Commercial & Industrial    | Large Commercial New Construction        | \$2,082                                | 1.15%                             |
| 31                                  | 2017 | Gas      | Commercial & Industrial    | Large Commercial Retrofit                | \$4,608                                | 2.55%                             |
| 32                                  | 2017 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | \$795                                  | 0.44%                             |
| 33                                  | 2017 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | \$3,825                                | 2.17%                             |
| 34                                  | 2017 | Gas      | Non-Low Income Residential | Energy Star® HVAC                        | \$1,584                                | 0.88%                             |
| 35                                  | 2017 | Gas      | Non-Low Income Residential | EnergyWise Multifamily                   | \$1,145                                | 0.63%                             |
| 36                                  | 2017 | Gas      | Non-Low Income Residential | Residential New Construction             | \$920                                  | 0.51%                             |
| 37                                  | 2018 | Electric | Commercial & Industrial    | Small Business Direct Install            | \$5,982                                | 3.31%                             |
| 38                                  | 2018 | Electric | Non-Low Income Residential | ENERGY STAR® Lighting                    | \$10,705                               | 5.93%                             |
| 39                                  | 2018 | Electric | Non-Low Income Residential | Residential New Construction             | \$757                                  | 0.42%                             |
| 40                                  | 2018 | Gas      | Commercial & Industrial    | Small Business Direct Install            | \$143                                  | 0.08%                             |
| 41                                  | 2018 | Gas      | Commercial & Industrial    | Commercial & Industrial Multifamily      | \$915                                  | 0.45%                             |
| 42                                  | 2018 | Gas      | Low Income Residential     | Single Family - Income Eligible Services | \$4,225                                | 2.34%                             |
| 43                                  | 2018 | Gas      | Low Income Residential     | Income Eligible Multifamily              | \$2,420                                | 1.34%                             |
| 44                                  | 2018 | Gas      | Non-Low Income Residential | Residential New Construction             | \$640                                  | 0.35%                             |
| 45                                  | 2020 | Electric | Commercial & Industrial    | Small Business Direct Install            | \$7,508                                | 4.16%                             |
| 46                                  | 2020 | Electric | Non-Low Income Residential | Residential New Construction             | \$950                                  | 0.53%                             |
| 47                                  | 2020 | Electric | Non-Low Income Residential | Energy Star® HVAC                        | \$3,364                                | 1.86%                             |
| 48                                  | 2020 | Electric | Non-Low Income Residential | Residential Consumer Products            | \$2,241                                | 1.24%                             |
|                                     |      |          |                            |                                          | <b>\$180,823</b>                       | <b>100.00%</b>                    |
| Electric Commercial & Industrial    |      |          |                            |                                          | \$52,101                               | 34.38%                            |
| Electric Non-Low Income Residential |      |          |                            |                                          | \$54,816                               | 30.35%                            |
| Electric Low Income Residential     |      |          |                            |                                          | \$19,666                               | 10.89%                            |
| Gas Commercial & Industrial         |      |          |                            |                                          | \$19,632                               | 10.87%                            |
| Gas Non-Low Income Residential      |      |          |                            |                                          | \$13,838                               | 7.66%                             |
| Gas Low Income Residential          |      |          |                            |                                          | \$10,570                               | 5.85%                             |
|                                     |      |          |                            |                                          | <b>\$180,823</b>                       | <b>100.00%</b>                    |

Attachment 3-10-2

**REDACTED**

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 5189  
In Re: 2022 Annual Energy Efficiency Plan  
Responses to the Commission’s Third Set of Post-Decisional Data Requests  
Issued on June 8, 2022

PUC Post-Decisional 3-11

Request:

Please provide a schedule showing the performance incentive earned in each year for the period 2012-2021. Please provide two columns, one for electric and one for gas, and sum the totals for each column.

Response:

Please see below table which does not include the proposed net downward adjustment of \$1,400,423.00 as identified in the Company’s review of invoices within the energy efficiency program that was filed on June 7, 2022.

| Year                | Electric<br>PI Earned | Gas<br>PI Earned | Electric + Gas<br>PI Earned |
|---------------------|-----------------------|------------------|-----------------------------|
| 2012                | \$ 2,469,411          | \$ 586,036       | \$ 3,055,447                |
| 2013                | \$ 2,997,681          | \$ 968,229       | \$ 3,965,910                |
| 2014                | \$ 4,223,321          | \$ 1,362,108     | \$ 5,585,429                |
| 2015                | \$ 4,533,360          | \$ 1,387,079     | \$ 5,920,439                |
| 2016                | \$ 4,128,034          | \$ 1,496,869     | \$ 5,624,903                |
| 2017                | \$ 4,829,847          | \$ 1,633,531     | \$ 6,463,378                |
| 2018                | \$ 4,940,402          | \$ 1,541,255     | \$ 6,481,657                |
| 2019                | \$ 3,290,237          | \$ 1,580,119     | \$ 4,870,356                |
| 2020                | \$ 3,242,675          | \$ 347,732       | \$ 3,590,407                |
| 2021 <sup>(1)</sup> | \$ 3,464,590          | \$ 333,123       | \$ 3,797,714                |
| Total 2012-2021     | \$ 38,119,558         | \$ 11,236,081    | \$ 49,355,639               |

<sup>(1)</sup> For 2021, the total performance incentive included above is a net of the performance incentive earned and the service quality adjustments.