

August 24, 2023

Toby Ast  
Project Manager, Customer Programs  
Rhode Island Energy  
Delivered via email to [teast@rienergy.com](mailto:teast@rienergy.com)

## Comments on 2024 Annual Energy Efficiency Plan – Equity Targets

To Whom It May Concern:

Acadia Center appreciates the opportunity to submit comments on Rhode Island Energy (“the Company”)’s 2024 Annual Energy Efficiency Plan, now and at additional milestones throughout the remainder of 2023. These comments are intended to supplement discussions held during Energy Efficiency Technical Working Group (“EETWG”) and Energy Efficiency Equity Working Group (“EWG”) meetings, and during public comment opportunities before the Energy Efficiency and Resource Management Council (“EERMC”).

Through recent participation in the Equity Working Group and review of the Company’s 2023 Q1 and Q2 Equity Updates, we have failed to see sustained effort or progress on equity initiatives. As outlined in Acadia Center’s June 29 comments on the Draft Narrative of the 2024-2026 3-Year Energy Efficiency Plan<sup>1</sup>, the Company continues to avoid establishing meaningful metrics to track progress in its planning processes and quarterly reporting. The Annual Report of the Equity Working Group (“EWG”) is referenced but does not meaningfully inform the planning and reporting of the Company. For example, the 2022 (Year 2) RI EWG Report offers specific metrics that the Company should leverage to better incorporate equity in the planning, design, and delivery of its energy efficiency programs, and which would significantly improve the data quality currently offered by the Company in quarterly equity reports.

In sum, Acadia Center recommends that the Company present energy efficiency (“EE”) data by more meaningful geographic areas, establish and report on a wide range of specific, measurable equity metrics and targets for key EE measures and outreach and engagement, and commit to funding trusted community partners in 2024 to advance EE equity. We offer specific examples of **2024 annual targets** for further iteration with the Company and stakeholders and inclusion in the final draft of the 2024 Annual Energy Efficiency Plan. These comments align with and build on Acadia Center’s model of “Next Generation Energy Efficiency<sup>2</sup>.” Far more must be done to improve the efficiency of our homes and businesses and to ensure that efficiency programs deliver benefits equitably across all communities and income levels.

---

<sup>1</sup> Acadia Center’s Comments on Rhode Island’s 3-Year 2024-2026 Energy Efficiency Plan, June 29, 2023:

<https://acadiacenter.wpenginepowered.com/wp-content/uploads/2023/07/Acadia-Center-RI-EE-24-26-comments-06-29-23.pdf>

<sup>2</sup> Acadia Center, 2021. “Next Generation Energy Efficiency, Pivoting Energy Efficiency to Address Climate Change, Environmental Justice, and Underserved Consumers.” <https://acadiacenter.org/resource/next-generation-energy-efficiency-brief/>

### Meaningful Geographic Categorization

In recent quarterly equity updates, assessment and weatherization participation is presented by census designated place (“CDP”)<sup>3</sup> (in the 2024 annual plan, this data is only offered at Q2 and Q4). In section 2.7 of the 2024 Annual Energy Efficiency Plan, the Company proposes tracking spending by zip code (although only offering to report this at the year-end report). Acadia Center recommends that the Company present and categorize energy efficiency data by geographic areas which have more meaning than CDPs or zip code. By narrowing down and consolidating reporting metrics by more meaningful geographic areas, the Company should also commit to reporting on these metrics on a consistent quarterly basis. Geographic categorizations may also be informed by the ability of the Company to establish informed annual targets for those areas.

Acadia Center offers the following suggested geographic categorizations of energy efficiency data:

- Municipality would allow for coordination with municipal-level programs or outreach, and avoid any confusion around the accounting for villages within RI municipalities.
- Divide the state by outreach service areas (i.e. CAPP agencies), which may inform targeted funding and outreach.
- Identify environmental justice areas in order to generate and compare rates of participation for EJ and non-EJ areas.
  - Once EJ areas have been isolated, a simple target could align with Justice40. For example, aim to have at least 40% of assessments and 40% of weatherizations performed in EJ communities.

### Specific, Measurable Equity Metrics and Targets for Key EE Measures

Based on data from the nonparticipant study, past performance, or other sources, the Company should include specific, measurable metrics and targets in its 2024 Annual Energy Efficiency Plan.

The numbers of home energy assessments and weatherizations reported by the Company hold little meaning without referral to the size of the geographic area, number of eligible customers in that area, and a target or goal for the year. In the Company’s recent Second Quarter Equity Update, the separate tables for assessment and weatherization participation should be placed side by side in order to show the *conversion rate* (%) from home energy assessment to weatherization. The *universe of eligible customers* for each geographic area should also be included, for an understanding of the percentage of customers reached in each market. By establishing an annual target for assessment and weatherization participation, quarterly reports would be able to include the percentage achievement towards the annual target. We also encourage the Company to consider not only the input of funding distribution, but also the outcome of distribution of energy efficiency benefits.

Acadia Center proposes the following **metrics**, which may be presented and compared for both EnergyWise and Income-Eligible customers and across meaningful geographic areas:

---

<sup>3</sup> CDPs in Rhode Island includes villages which often straddle municipalities. Depending on the automation of data reports, this may run the risk of double counting or undercounting participants. For example, Ashaway is a village within the town of Hopkinton; Bradford is a historic district across the towns of both Hopkinton and Westerly. Do the participant numbers for the Town of Hopkinton then exclude those participants from Ashaway, Bradford and other overlapping CDPs?

- % of eligible customers participating in Home Energy Audits
- % resolution of pre-weatherization barriers
- % conversion from Home Energy Audit to Weatherization
- % Weatherization jobs by WMBEs
- % total energy savings benefiting residential customers in environmental justice communities
- Year-by-year increase in energy savings benefiting customers

Understanding the baseline of the above metrics for the 2022 and 2023 program years will allow the Company to set ambitious yet tangible annual targets for improving energy efficiency programs. We acknowledge that annual targets may need to vary based on geographic area and past performance. For example, a % increase based on the previous year's performance may be reasonable. We simply emphasize the need for quantitative targets such as this which improve upon past performance.

Acadia Center provides the following examples of **2024 annual targets** for further iteration with the Company and stakeholders:

- 20% of eligible customers participate in Home Energy Audits
- 35% of preweatherization barriers resolved
- 50% conversion rate from Home Energy Audit to Weatherization (for those in which weatherization is identified)
  - Compare follow through rate by geographic area, income level or other factors
- 20% of Weatherization jobs by WMBEs
- 40% of total energy savings benefiting residential customers in environmental justice (i.e. Justice40) communities
- Total quantity (\$#) of energy savings to customers increase by 15% from previous year

The EWG should have the opportunity to provide feedback on the Company's metrics for key EE measures and 2024 targets. Further, the Company should report on progress towards achieving these equity targets on a quarterly basis. With this, quarterly reports would be able to include the percentage achievement towards the target and adjust outreach and engagement strategies accordingly.

### Specific, Measurable Equity Metrics and Targets for Outreach and Engagement

Acadia Center wishes to see more specific, measurable outreach and engagement metrics and annual targets which the Company intends to undertake during the 2024 program period in response to the recommendations of the Energy Efficiency Equity Working Group (EWG). In recent quarterly equity updates, the Company has provided a cursory list of 'outreaches' (presence at events of other community organizations) and organizations 'targeted' to conduct energy efficiency training. This data lacks comparison to an annual target or goal, as well as any detail regarding the nature or success of the Company's presence at events or the extent of training conducted. Similar to the above comments on key EE measures, we encourage the Company to measure their impact beyond inputs such as events attended and consider such outcomes as meaningful customer interactions, HEAs resulting from outreach events, or overall trends in customer participation by geographic area. An overview of the geographic distribution of outreach and engagement efforts would also be valuable.

Acadia Center proposes the following outreach and engagement **metrics**, building on the recommendations of the 2022 (Year 2) EWG Report:

- % of eligible customers reached at events
- % distribution of outreach events in environmental justice communities
- # of HEA customers that learned about or signed up at an outreach event
- % of marketing & education interactions with customers broken down by customer group
- # of individuals trained in each outreach service area
- Funding allocated to community-based organizations for education and engagement
- Number of referrals from community organizations

The 2024 Annual Energy Efficiency Plan should **establish annual equity targets** aligned with the quantitative outreach and engagement metrics recommended by the Equity Working Group. Targets may be informed by data from the nonparticipant study, past performance, or other sources. Understanding the baseline of the above metrics for the 2022 and 2023 program years will allow the Company to set ambitious yet tangible annual targets. It may also be helpful to establish outreach and engagement targets by geographic area, and in partnership with outreach agencies. We acknowledge that annual targets may need to vary based on geographic area and past performance. For example, a % increase based on the previous year's performance may be reasonable. We simply emphasize the need for quantitative targets such as this which improve upon past performance.

Acadia Center provides the following examples of **2024 annual targets** for further iteration with the Company and stakeholders:

- 5% of eligible customers reached at events
- 40% of outreach events conducted in environmental justice communities
- 5-25 HEA customers learned about or signed up at an outreach event in each outreach service area
- % of marketing & education interactions with customers mirrors the % distribution of customer groups
- 3-10 individuals trained in each outreach service area
- Funding allocated in 2024 to community-based organizations for education and engagement
- 10-50 referrals from each community organization

The EWG should have the opportunity to provide feedback on the Company's metrics for outreach and engagement and 2024 targets. Further, the Company should report on progress towards achieving these equity targets on a quarterly basis. With this, quarterly reports would be able to include the percentage achievement towards the target and adjust outreach and engagement strategies accordingly.

#### **Commit Funding Now to Trusted Community Partners in Environmental Justice Communities**

Meaningfully funding community partners to conduct energy efficiency education and outreach has been a consistent recommendation of the EWG. The Company's proposed 'demonstration' is non-specific and does not

reflect the urgency and scale required to improve equity efforts<sup>4</sup>. Acadia Center recommends that the Company model a program after Mass Save's Community First Partnership by allocating annual funds to support community-based organizations and municipalities in implementing energy efficiency programs in their communities. These incentives to community-based organizations and municipalities are in addition to energy efficiency incentives already available to residents. In Massachusetts, the utility program directly funds an organization to provide training for communities, and that organization then hires members of the local communities to do on-the-ground education and outreach on the utility's energy efficiency programs.

### Additional Comments

In addition, Acadia Center has the following broader recommendations for the 2024 Annual Energy Efficiency Plan:

- Add induction cooktops to incentivized measures
- More significant reduction in natural gas incentives
  - Acknowledge that natural gas measures are largely not cost-effective
  - Reallocate funding from natural gas incentives to provide more weatherization and air sealing, enabling savings regardless of heating fuels and supporting future electrification
  - Acadia Center would like to highlight that our neighbors in Massachusetts have nearly eliminated incentives for new fossil fuel equipment in their 2025-2028 Energy Efficiency Plan.
- Performance-based contracts for efficiency program vendors, in order to align incentives towards higher goal attainment
- Establish specific target for microbusiness participation
- Offer more details on coordination with federal funds

Sincerely,

Emily Koo

Senior Policy Advocate & Rhode Island Program Director

[ekoo@acadiacenter.org](mailto:ekoo@acadiacenter.org)

---

<sup>4</sup> The Company will work with the EWG "to develop how to engage with non-profits and the funding structure for participation" and "work with a handful of stakeholders.... [to provide] direct outreach to landlords in one or more of the five equity communities."