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## Comments on 2025 Annual Energy Efficiency Plan Draft Narrative

To Whom It May Concern:

Acadia Center appreciates the opportunity to submit comments on Rhode Island Energy (“the Company”)’s 2025 Annual Energy Efficiency Plan Draft Narrative (“2025 EE plan”), now and at additional milestones through the remainder of 2024. These comments are intended to supplement discussions held during Energy Efficiency Technical Working Group (TWG) and Energy Efficiency Equity Working Group (EWG) meetings, and during public comment opportunities before the Energy Efficiency Council.

### Equity Integration

Acadia Center applauds the Company for the development of specific, measurable equity metrics in the first half of 2024. Breaking down energy audits completed and weatherization projects completed not only by program type (i.e. single family, multifamily, income-eligible, renters) but also by meaningful geographic area (i.e. Justice 40 community, CAP service territory) is critical to understanding and addressing the distributional equity of our energy efficiency programs.

However, Acadia Center urges the Company to go beyond attaching the EWG report as an attachment at the end of the plan, and to further embed EWG recommendations throughout the development of the 2025 plan, with specific recommendations below. The fact that the 2025 EWG final report is finalized at a similar time as the 2025 EE plan should not preclude the integration of the ongoing work of the EWG. Specifically, Acadia Center, as a member of the EWG, supports the incorporation of recommendations of the 2024 EWG report as well as ongoing EWG meeting discussions into the current draft of the 2025 EE plan.

In addition to listing the equity metrics agreed upon between the Company and the EWG as of Q2 2024, Acadia Center recommends that the Company make a specific commitment, in consultation with the EWG, to the timeframe and frequency for reporting on those metrics in late 2024 and throughout 2025, as part of the 2025 EE plan. In line with ongoing discussions at the EWG, Acadia Center also asks the Company to continue to expand the scope of these metrics by the end of 2024.

To avoid the ongoing misalignment of equity recommendations with the development of EE plans, the Company and stakeholders may also consider shifting the timeline for producing EWG reports, such that equity recommendations

are finalized prior to the Company's development of this first draft narrative. For example, an annual EWG report may be finalized in Q1 of 2025, covering CY 2024, in order for the Company to embed those recommendations into its first draft narrative of the 2026 annual EE plan released in June of 2025.

### Specific Equity Recommendations

The following is a list of ongoing equity recommendations offered by the EWG and Acadia Center that have not and should more specifically be addressed in the 2025 EE plan.

- Building a network of community-based partners to help the company remove barriers to participation with sufficient compensation and capacity.
  - Providing funding for community-based partners that is sufficient to support hiring energy advocates at wages that reduce turnover, as specifically recommended by the Massachusetts Energy Efficiency Advisory Council.
- Offering workforce and contractor trainings on codes (and other topics) in Spanish leveraging the train the trainer model.
  - Developing a more detailed language access plan for energy efficiency programs, which is embedded in annual plans and outreach.
  - Establishing meaningful metrics to measure success and regularly report on language access.
- Including transparency on progress of equity metrics in the public-facing data dashboard to be launched at the beginning of 2025.
- In addition to establishing equity metrics, establishing a three-year roadmap for how those metrics will eventually be tied to a performance incentive mechanism ("PIM").
  - Establishing a PIM is a critical priority of both Acadia Center as well as the Energy Efficiency Council and would utilize the existing service quality adjustment (SQA) mechanism which has precedent in the current PIM structure.

### Pre-Weatherization Barriers

Acadia Center applauds the Company's efforts to improve data tracking systems and pursue additional funding sources to address pre-weatherization barriers. Better understanding pre-weatherization barrier types and Community Action Program service territory are critical to diagnosing and tackling these significant barriers to energy efficiency program access. However, it is also important that the Company's pre-weatherization metrics expand to track not only the # of audits with pre-weatherization barriers detected, but also the *resolution* rates of pre-weatherization barriers.

### Outreach and Coordination Recommendations

- Tracking progress and reporting on discount rate enrollment as an important mechanism through which the Company does outreach and engagement on energy efficiency.
  - Specifically, tracking and reporting the enrollment rate over time, % of eligible customers enrolled, and what % are also participating in energy efficiency programs.
- Offering additional details on the *number* of communities that have leveraged the Community Solutions Initiative and Main Street Initiative, and committing to a target for number of communities the Company aims to engage in these programs in 2025.

- Providing details on how the Company envisions growing and scaling the impact of these programs in the long-term.
- Regarding residential consumer products, offering more details on the education and training of retail staff on the promotion of high efficiency household appliances. Reporting on the relative availability and sale of products carrying the energy star label at retailers across Rhode Island.
- As the state weighs the adoption of benchmarking requirements, the Company has a role to play in summarizing and sharing the resources of its annual energy efficiency plans and programs with policymakers, including:
  - The current provision of benchmarking data to 88 customers across the state.
  - The robust availability of energy efficiency incentives, through the Company as well as such programs as the RI Infrastructure Bank's small business energy efficiency grant fund and CommerceRI's RI Rebounds Energy Efficiency Program.
- Note that a rental registry is not actively being developed by the RI Department of Health or other body and unfortunately is not ready to incorporate energy efficiency.
- In addition to participation on the Green Buildings Advisory Committee (GBAC), coordinate with the Green Energy Workforce Advisory Committee (DLT).

Sincerely,

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