



June 30, 2017

via electronic submission: DPUC.powertransformation@dpuc.ri.gov

The Honorable Margaret Curran, Chairperson
Rhode Island PUC, DPUC, and OER
89 Jefferson Blvd, Warwick, RI 02888

RE: NEEP Comments Regarding a Utility's Role in Deploying Beneficial Electrification with Focus on Plug-in Electric Vehicles

Dear Chairperson Curran,

On behalf of Northeast Energy Efficiency Partnerships (NEEP), I am pleased to submit comments in regards to the utility's role in deploying beneficial electrification (or strategic electrification), with a focus on plug-in electric vehicles (EVs). NEEP is a non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency as an essential part of demand-side solutions that enable a sustainable regional energy system. Our vision is that the region will fully embrace next generation energy efficiency as a strategy to meet energy needs in a carbon-constrained world.

NEEP thanks the Rhode Island Public Utility Commission, the Division of Public Utilities and Carriers (DPUC), and the Office of Energy Resources (OER) for the opportunity to provide input on the Power Sector Transformation Initiative. Rhode Island has been a leader in energy efficiency programs and policies for several years, scoring a four on ACEEE's state energy efficiency scorecard in 2016. The state has shown continued involvement in regional market transformation for years and this new Power Sector Transformation Initiative is the next wave in regional leadership.

NEEP is pleased to assist the PUC, DPUC, OER, the utilities and other Rhode Island state agencies and stakeholders to realize the full value strategic electrification to meet the State's efficiency, clean energy and carbon emission reductions goals. In particular, we offer to Rhode Island the opportunity to increase the impact of strategic electrification through our regional assessment of strategic electrification report, which will be published by the end of July. In addition, NEEP will be preparing a Regional Action Plan which will be published by the end of August. Both of these resources may be useful to this process, and in the meantime, the [Executive Summary](#) of the report is available.

While the specific focus is on electric vehicles with the assumption that many of the principles may be extended to electrification of the heating sector, NEEP has provided further information on air-source heat pumps below that may be useful in the electrification of the heating sector in Rhode Island.

Strategic Electrification

Air-Source Heat Pumps (ASHP): Over the past few years, ASHPs have been garnering interest from stakeholders across the region due to the potential energy, cost, and carbon savings that the technology is poised to deliver. NEEP has been leading a regional market transformation initiative during this time in an effort to effectively



coordinate market interventions to accelerate the adoption of ASHPs. The regional working group has included several stakeholders from Connecticut. NEEP worked with regional stakeholders to develop a Regional ASHPs Market Transformation Strategy Report¹ that provides a collection of priority strategies to drive adoption of ASHPs and achieve long term market transformation. Strategy areas include consumer/installer education, cost reduction, research, improved performance metrics, integrated controls, and state/local policies. Rhode Island stakeholders, including program administrators can continue to stay engaged with the regional effort and leverage several resources NEEP has available;

- NEEP's [Cold-climate ASHP Specification](#) provides a list of ASHP systems that perform well both seasonally as well as during cold winter temperatures. Existing metrics do not provide adequate characterization. The list can be used to identify efficient ASHPs that maintain efficiency even during cold temperatures. It can also be used as a tool to aid decision making related to sizing ASHPs effectively.
- NEEP developed two [Installer Guides](#) to improve the sizing, selection and installation of ASHPs in cold climates. The Guides were vetted by a broad group of expert stakeholders. Programs can utilize them as they are or utilize content in other resources.

NEEP's Regional Working Group will continue to be a useful forum for regional stakeholder to discuss and coordinate effective market intervention strategies. Rhode Island stakeholders, including program administrators, are welcome to continue participation in the group.

Conclusion

NEEP commends the PUC, DPUC, and OER for their continued energy efficiency leadership. The Power Sector Transformation Initiative seeks to shape the ongoing transformation of the electric grid and NEEP hopes to continue to provide resources that can assist Rhode Island in doing so. We would be pleased to provide further information to assist in the beneficial electrification of transportation and heating work stream.

Sincerely,

A handwritten signature in black ink that reads "Samantha Caputo". The signature is written in a cursive, flowing style.

Samantha Caputo
Research Associate
SCaputo@neep.org
Northeast Energy Efficiency Partnerships

¹ Northeast Energy Efficiency Partnerships, Northeast/Mid-Atlantic Air-Source Heat Pump Market Strategies Report 2016 Update, (January 2017), Available at: http://www.neep.org/sites/default/files/NEEP_ASHP_2016MTStrategy_Report_FINAL.pdf