



SUBMITTED ELECTONICALLY TO:

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RE: Comments of Clean Energy Group on The Narragansett Electric Company d/b/a Rhode Island Energy second draft 2027-2029 System Reliability Procurement (SRP) Three-Year Plan -- In preparation for submission to: Rhode Island Public Utilities Commission in RIPUC Docket No. 26-EE

Clean Energy Group (CEG) works at the forefront of clean energy innovation to enable a just energy transition to address the urgency of the climate crisis. Serving as a trusted nonprofit partner for communities, advocates, and policymakers, CEG bridges critical gaps in the clean energy sector through expert technical assistance, responsive guidance, and independent analysis. CEG works across the country to increase access to distributed energy resources in historically marginalized communities, advance equitable clean energy policies, and accelerate the retirement of polluting power plants in environmental justice communities.

Founded in 1998, CEG has supported the development and implementation of many of the country's first customer-focused distributed energy incentive programs. Through the organization's technical assistance programs, CEG has collaborated with more than 200 community-based partners to assess the feasibility of resilient solar and battery storage projects at nearly 400 facilities across 33 states and territories, resulting in over 100 completed solar and energy storage installations at community-serving facilities.

CEG specifically wishes to comment on the ConnectedSolutions program.

CEG congratulates Rhode Island Energy on its commitment to equitable and affordable energy, for example through its Discount Rate Program, which offers eligible customers a 25% or 30% discount on their monthly energy bills. However, we note that there are no similar equity provisions in ConnectedSolutions that would make it more accessible to low-income customers. This seems odd in light of the lower-than-expected rate of participation among residential customers, which could point to a need for accessibility measures such as an LMI enrollment incentive.

On page 24 of its SRP Plan, RIE states that some 14,000 customers are participating in ConnectedSolutions, resulting in an estimated \$100 million in avoided costs since the program's inception. These numbers reflect a program that, despite challenges, has been successful. However, according to RIE's 2025 year-end report, an estimated \$2.40 million remained within the approved budget allocation for that year, due in part to lower-than-expected enrollments in the residential and small business pathways.

According to a new report from the United Way,¹ nearly 43 percent of Rhode Island households – more than 190,000 families – are struggling financially, with income levels below the ALICE Threshold of Financial Survival in 2024 (ALICE stands for Asset Limited, Income Constrained, Employed).

Since high initial capital investment requirements are a primary barrier to battery acquisition, adding equity provisions to ConnectedSolutions would seem a reasonable way to make it accessible to more residential customers, not to mention bringing the program in line with RIE's (and Rhode Island PUC's) equity and affordability commitments. An equity adder of some kind is particularly needed since compensation rates in the Rhode Island ConnectedSolutions program have dropped precipitously, from \$400/kW for customers enrolled prior to June, 2024 to the present rate of \$225/kW for customers enrolled after June, 2024.

Fortunately, Rhode Island is in the position of being able to learn from equity provisions and pilots already developed in similar programs by neighboring states. These include:

- ConnectedSolutions+ equity pilot programs in development in Massachusetts. The MassCEC Equity in Grid Services Initiative will develop two equity-facing VPP pilots. The RFP seeks to “Design and implement two community-centered pilots that expand access to dispatchable DERs and ConnectedSolutions+ for renters and low- and moderate-income residents in historically underserved, burdened, or environmental justice communities, launching by Spring/Summer 2027 with a one-year operation.” All DERs developed through the pilots will be enrolled in ConnectedSolutions. See <https://www.masscec.com/program/request-proposals-equity-grid-services-initiative-piloting-equitable-access-dispatchable>
- The Cape and Vineyard Electrification Offering (CVEO) developed by Cape Light Compact. This program, approved by the Massachusetts Department of Public Utilities in January 2023, aims to serve 100 low- to moderate-income households on Cape Cod. The CVEO is a comprehensive strategic electrification and energy optimization pilot designed to promote and increase equitable access to clean energy and energy-efficient technologies through targeted incentives. Deed-restricted households, whether low-income or moderate-income, are eligible to receive rooftop solar panels and heat pumps at no cost, as well as a 100 percent incentive on heat pumps, solar PV, and battery storage. Non-deed restricted moderate-income households are eligible to receive an 80 percent incentive on heat pumps, as well as a \$15,000 incentive towards solar. All BTM systems are enrolled in ConnectedSolutions. See <https://www.cleanegroup.org/publication/solar-storage-electrification-cveo-massachusetts/>

¹ <https://rhodeislandcurrent.com/wp-content/uploads/2026/09/ALICE-in-RI-Full-Report-2026.pdf>

- Energy Storage Solutions in Connecticut, co-administered by the Connecticut Green Bank and the state's electric utilities. This is a 9-year program with a goal of deploying 580 MW of behind-the-meter storage for residential and commercial/industrial ("C&I") customers, for aggregated peak demand reduction. The program employs a combination of enrollment and performance incentives, and includes strong equity provisions including a \$550/kW performance incentive for low-income customers, and a \$450/kW performance incentive for residents of underserved communities (the standard residential rate is \$300/kW). See <https://energystoragect.com/energy-storage-for-your-home/>
- Green Mountain Power's (GMP) Energy Storage Access Program Rider in Vermont. Through this program, GMP will provide two Tesla Powerwalls for free to eligible residential customers. Eligibility is limited to customers with household income at or below 120% of Area Median Income (AMI); disadvantaged communities, lowest-income households, and households with critical medical needs who experience frequent outages are prioritized in the program. Batteries are dispatched by GMP during peak demand hours to reduce capacity and transmission costs. See <https://static.greenmountainpower.com/tariffs/add-ons/Energy-Storage-Access-Program-Rider.pdf>

It is ironic that while ConnectedSolutions was named Energy Equity Power Player of the Year by SEPA in 2025², there has been no attempt to make the program more affordable or accessible to underserved communities or low-income customers in Rhode Island. Going forward, the program should begin to incorporate equity provisions – as is already being done in neighboring states.

CEG respectfully submits these comments. We are happy to answer any questions or to provide additional information and program development support upon request.



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² <https://sepapower.org/knowledge/2025-sepa-power-player-awards-winners-announced/>