

**Comments of Northeast Energy Efficiency Partnerships (NEEP)
To the Connecticut Department of Energy and Environmental Protection (DEEP),
The Massachusetts Department of Energy Resources (DOER),
Eversource Energy, National Grid, and Unutil
Regarding the Draft Request for Proposals for Clean Energy and Transmission
March 24, 2015**

Introduction:

On behalf of Northeast Energy Efficiency Partnerships, I am pleased to offer input on the Draft Request for Proposals for Clean Energy and Transmission (“Draft RFP”).¹ NEEP is a regional non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency in the building sector through public policy, program strategies and education. We are one of six Regional Energy Efficiency Organizations (REEOs) as designated by the U.S. Department of Energy to work collaboratively with them to support states in advancing energy efficiency. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

We commend the spirit of this solicitation, and, in particular, the regional focus on clean energy that it serves. The New England States are acknowledged as national leaders for their active pursuit of clean energy goals, though most of those goals have been historically pursued on a state-by-state basis.

And recognizing the leadership role that the states of Rhode Island, Connecticut and Massachusetts have taken in defining energy efficiency, in particular, as a first order resource, we use the opportunity to provide comment on the Draft RFP to focus on the evaluation criteria framing it. Specifically, we respectfully suggest that any projects involving transmission infrastructure investment should account for foreseeable non-wire alternatives within any cost-benefit analysis.

As requested by the Draft RFP, below we have: (1) cited specific sections of the RFP for revision; (2) offered complete alternative language; and (3) outlined how modifications will enhance the success of the proposed RFP and advance State clean energy goals.

Proposed Modifications:

Page 5, Section **1.2.1 DEFINITION OF KEY TERMS**

Addition:

“Non-Wire Alternatives” are strategies that may defer or eliminate the need for planned investment in certain long-term and centralized infrastructure, and include but are not limited to:

- a. Least Cost Procurement energy efficiency baseline services;
- b. Peak demand and geographically-focused supplemental energy efficiency strategies;
- c. Distributed generation generally, including renewable energy and combined heat and power resources (predominantly wind and solar, but not constrained);
- d. Demand Response;
- e. Direct load control;

¹ These comments are offered by NEEP staff and do not necessarily represent the view of NEEP’s Board of Directors, sponsors or underwriters.

- f. Energy Storage; and
- g. Alternative tariff options.

Page 24, Section **2.3.2.1 FACTORS TO BE ASSESSED IN QUALITATIVE EVALUATION**

Addition:

Bullet added under “Other Qualitative Factors” section stating:

- *Whether any project involving investment in transmission infrastructure could be more cost-effectively implemented through application of non-wire alternatives.*

The above modification will enhance the success of the proposed RFP and advance state clean energy goals by avoiding any centralized transmission infrastructure investments that may prove costlier than non-wire alternatives over the lifecycle of such investments.² As the focus of this solicitation rests upon procurement of clean energy resources, we suggest those resources can be most effectively and efficiently delivered through non-wire alternatives that minimize line losses, locational constraints, and legal costs embodied within the siting process.

For example, Connecticut,³ Massachusetts,⁴ and Rhode Island⁵ are piloting or have considered piloting “non-wire alternative” programs that utilize DER and/or performance-based regulatory incentives intended to alleviate needs for additional centralized production plants and transmission upgrades. This is a foreseeably continuing trend within the regional energy system and should be accounted for within the cost-benefit analysis of any proposed transmission infrastructure.

Conclusion

Thank you for the opportunity to comment on the Draft RFP. Please consider NEEP a resource to provide assistance and support within the region as you pursue clean, efficient energy strategy solutions in the future.



Brian D. Buckley,
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² Neme, Chris (et.al.). *Energy Efficiency as a T&D Resource: Lessons from Recent U.S. Efforts to Use Geographically Targeted Efficiency Programs to Defer T&D Investment*. Page 77. (January 2015) Accessed: 3/24/15. Available at: <http://www.neep.org/file/2414/download?token=bNV2vVea>

³ Connecticut Department of Energy and Environmental Protection. *2014 Integrated Resources Plan for Connecticut*. (March 2015) Page 116-117. (Stating, “The Department proposes to... identify those circuits in which there are opportunities to align existing DER deployment efforts... to support and enhance the needs of the distribution system.”) Accessed: 3/23/15. Available at: http://www.ct.gov/deep/lib/deep/energy/irp/2014_irp_final.pdf

⁴ Coughlin, Tom. National Grid. *Utility Outlook—Energy Efficiency and the Utility of the Future*. Page 9. (Explaining pilot programs that will foreseeably be expanded to National Grid’s broader distribution service area). (January 2015) Accessed: 3/24/15. Available at: http://aenewengland.org/images/downloads/Past_Meeting_Presentations/thomas_coughlin_energy_efficiency_and_the_utility_of_the_future.pdf.

⁵ Anthony, Abigail (et.al.). *Energy Efficiency in Rhode Island’s System Reliability Planning*. (Describing “non-wire alternative” pilot programs within Rhode Island that have successfully deferred investment in transmission and distribution infrastructure.) Page 3-10. Accessed: 3/24/15. Available at: <http://aceee.org/files/proceedings/2014/data/papers/10-814.pdf>