

REQUEST FOR INFORMATION (RFI) ON EFFICIENCY MAINE TRUST TRIENNIAL PLAN V (FISCAL YEARS 2023-2025)

The Efficiency Maine Trust (the Trust) seeks preliminary comments from interested parties on implementation strategies, budgets, and metrics for the Trust to consider as it develops its next three-year plan (Triennial Plan V) for the period spanning fiscal years 2023, 2024, and 2025. These fiscal years run from July 1 through June 30. Interested parties will have another opportunity to submit comments on the draft plan when it is released in summer 2021.

SECTION 1 - INFORMATION AND INSTRUCTIONS

1.1 Designated Contact Person

Michelle Turner, Administrative Secretary
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Phone: (207) 213-4150
Email: comments@efficiencymaine.com

1.2 Key Dates

RFI Release Date – January 6, 2021
Preliminary Comments Due – April 9, 2021

Note that the Trust plans to post the draft Triennial Plan document online for comment in May 2021. The Trust plans to host an online public hearing on the draft document in July 2021. Interested parties will have until late July 2021 to submit final comments on the draft plan.

1.3 How to Submit a Response

Responses may be emailed to the designated contact person (see section 1.1), or uploaded at <https://www.efficiencymaine.com/triennial-plan-v/>, by the due date listed in section 1.2. Please find suggested guidelines below:

1. Cover Letter (1 page maximum)

Briefly describe your organization or personal background (for individuals), including relevant qualifications.

2. Response

Address one or more of the questions listed in section 3.2.

3. Appendices

Where helpful, attach relevant reports, published within the past few years, related to topics covered in the response. Please provide URLs where the documents may be accessed online. Where online access is not possible, please provide electronic copies in the response email or upload.

SECTION 2 - BACKGROUND INFORMATION

2.1 The Triennial Plan

Pursuant to Title 35-A, Section 10104(4) of the Maine Statutes, the Efficiency Maine Trust (the Trust) is directed to develop and approve:

a detailed, triennial plan that includes the quantifiable performance metrics developed under subsection 3 and make a full report of the vote to the commission in accordance with this subsection. The triennial plan must provide integrated planning, program design and implementation strategies for all energy efficiency, alternative energy resources and conservation programs administered by the trust, including but not limited to the electric efficiency and conservation programs under section 10110, the natural gas efficiency and conservation programs under section 10111, the Regional Greenhouse Gas Initiative Trust Fund under section 10109, the Heating Fuels Efficiency and Weatherization Fund under section 10119 and any state or federal funds or publicly directed funds accepted by or allocated to the trust for the purposes of [implementing the Efficiency Maine Trust Act].

Further information about what the statute requires of the Trust and Triennial Plan may be found at [35-A MRSA Section 10104\(4\)](#). For more information about the mandate for harvesting all energy efficiency resources that are cost-effective, reliable and achievable (also referred to as the Maximum Achievable Cost-Effective potential, or “MACE”), see Sections 10110(4-A) and 10111(2) of Title 35-A and prior orders of the Maine Public Utilities Commission in dockets 2018-00321, 2015-00175 and 2012-00449.

2.2 Timeline

The Plan will be developed by the Staff of the Trust. The Trust expects to publish a draft Plan in May 2021. The Trust will hold an online, public hearing to deliver an overview of the Plan and receive comments mid-July 2021. The Trust will continue to welcome written comments on the draft through late July 2021. After comments have been considered, the Trust Staff will present a final draft to the Board of Trustees for review and approval. The Trust is aiming to file an approved Triennial Plan at the Maine Public Utilities Commission in September 2021.

SECTION 3 - REQUEST FOR INFORMATION

3.1 Triennial Plan V Program Overview

Regarding the program designs for the next Triennial Plan, the Trust Staff envisions retaining the same basic portfolio of programs that are offered under the current plan, including the continuation of electric vehicle offerings. Among the contemplated changes for the program portfolio are expanded demand response offerings and non-wires alternatives.

3.2 Questions

At this time, the Trust welcomes written comments and reference materials on any issue relevant to the task of crafting Triennial Plan V. Analysis of specific topics or advocacy for particular positions should be relevant to the Trust's mission. The Trust particularly invites written responses that address the following specific questions:

1. We are currently planning to organize our programs into the following categories: Commercial and Industrial (C&I) Custom; C&I Prescriptive; Small Business Initiative; Distributor Initiatives; Retail Initiatives; Grid Support and Load Management; Home Energy Savings Program; Low Income Initiatives; Electric Vehicle Initiatives; Renewable Resource Fund (Demonstration Program); and Innovation Program. What discrete initiatives might we be missing? What alternative approaches to organizing these programs should we consider? What are the most important program aspects that the Plan should maintain and what are Program elements we should consider changing?
2. (A) The Innovation Program is designed to analyze and demonstrate cost-effectiveness of emerging measures that have reached (or are about to reach) commercialization, and to gain a better understanding of what strategies should be employed to promote a measure if it were to be added to the list of eligible measures through the Trust's regularly offered programs. What emerging technologies, operational or behavioral conservation measures, or grid support/load management strategies should we consider for future Innovation Program pilot projects? (B) Historically, the Trust has set the budget for the Innovation Program at either 0.5% or 1% of program budgets. Please comment on the appropriate budget level for the Innovation Program and, where possible, share examples of budget levels used for equivalent initiatives in other jurisdictions to support your recommendation.
3. As part of its Public Information and Outreach initiative, the Trust maintains an extensive website at efficiencymaine.com offering a variety of program descriptions and online tools and videos to help customers select efficient products, locate a vendor, request a rebate, and understand how to operate their efficient products to achieve maximum savings. The Trust hosts training workshops for various trade professionals and occasionally hosts seminars or symposia on topics related to energy conservation and alternative energy. The Trust also provides educational resources and information about efficient equipment directly to Mainers and recent rebate recipients. In what specific ways could we improve these resources and services? What examples from other entities should we consider?
4. In prior Plans, the Trust allocated 2.5% of the program budgets to "EM&V" (Evaluation, Measurement and Verification). EM&V activities encompass systematic data collection and analysis related to the Trust's programs. For more information, please refer to Chapter 6 of [Triennial Plan IV](#). One type of EM&V activity is third-party evaluations, which are required for every program costing more than \$500,000. Whereas Maine statute requires the Trust to evaluate major programs at least once every five years, the Trust's practice is to initiate these evaluations at least once every three years. Measurement and verification are largely managed by the Trust Staff with assistance from subcontractors. The

Trust seeks recommendations on the appropriate amount to budget for this strategic initiative in Triennial Plan V and the basis for such recommendations.

5. To prepare the Plan, the Trust will analyze the economic benefits and costs of electric (and natural gas) efficiency and conservation measures in order to determine the maximum amount of cost-effective savings potential that could be promoted through the Trust's programs. As prescribed in Chapter 3 and Chapter 4 of the Trust's rules, and further memorialized in the Trust's Technical Reference Manuals (TRMs) and past Triennial Plan filings at the Maine Public Utilities Commission (PUC), the Trust sums the avoided energy costs, marginal avoided transmission and distribution costs, and reduced water/sewer costs to determine the economic benefits of a measure. Please comment on any changes the Trust should make in how it accounts for benefits and costs in its analysis of cost-effectiveness.

6. In order to support the increased demand for heat pumps and to promote quality installations, Efficiency Maine developed a training module on "heat pump basics" that is required for all heat pump installers working with Efficiency Maine's residential programs. Efficiency Maine provides other trainings and workshops to contractors working in its commercial programs and is planning to provide building code training to contractors. Please comment on Efficiency Maine's efforts to support workforce development in energy efficiency, and include suggestions for additional areas we should consider addressing. What observations can you offer about the capacity or needs of Maine's trade professionals (e.g., electricians, plumbers, weatherization installers, heat pump installers, heating technicians, distributors, retailers, architects and engineers) to accommodate growing demand from Maine customers for heat pumps, weatherization, high-efficiency heating systems, and other conservation measures offered through the Trust's programs? Please also share any recommendations about the approach the Trust's Plan should take to support workforce training.

7. The Trust places a priority on advancing equity in delivery of its programs. For example, recent results of the Trust's programs promoting LED lights, heat pumps, and heat pump water heaters have shown strong distribution among low-income communities and in rural communities. Also, the Trust's programs have met the statutory requirements setting minimum budgets to benefit low-income Mainers. For some low-income initiatives, the Trust requires no financial contribution from the customer; for other low-income initiatives the Trust offers "enhanced rebates" for eligible customers while requiring some customers to have some "skin in the game." Please comment on how the Trust can improve on its goal of equitably delivering benefits to low-income communities while also advancing goals of maximizing energy savings, carbon reductions, and market transformation.

8. The Trust has spent the last two years testing various load management strategies through its Innovation Program and intends to offer a new program to deploy demand response, load shifting, and load management in the next plan. Examples of these pilot projects include load shifting in commercial freezers using phase-change material; a residential "Bring-Your-Own-Device" pilot; and incentives for off-peak EV charging. Please share examples of successful load management initiatives from other jurisdictions that the Plan could draw from, as well as any reports, studies or evaluations that would aid the Trust in designing or prioritizing these strategies.

9. Please comment on ways that the Trust’s electric vehicle (EV) initiatives could be improved in the next Triennial Plan and any suggestions about how the Plan should address funding of these initiatives. The Trust currently invests limited, one-time funding (e.g., from the Volkswagen Settlement) in EV initiatives, including developing EV travel corridors with fast and Level-2 chargers; supporting EV charging infrastructure development across the state; providing incentives for electric vehicle purchases; and developing and distributing educational materials about EVs and EV charging. Additional funding for these initiatives will be available over the next three years from the settlement of the New England Clean Energy Connect (NECEC) project proposal. Please comment on what priorities or strategies the Trust should put in the Plan for (A) expanding EV charging infrastructure and (B) transforming the market for EVs? Please also comment on whether and how the Plan should propose to fund incremental electric vehicle initiatives beyond the funding available from the VW and NECEC settlement funds.

10. The state of Maine recently released *Maine Won’t Wait: A Four-Year Plan for Climate Action*, which outlines the state’s data-driven outcomes to achieve targeted emissions reductions. The plan sets ambitious goals for beneficial electrification and points to the Trust as a key implementer of beneficial electrification through investment in electric vehicles, heat pumps, heat pump water heaters and other technologies. The Trust anticipates there will be a significant funding gap between the funds the Trust is authorized to seek and the funds required to meet the Climate Action Plan’s goals. Should the Triennial Plan outline how the Trust would work to meet these goals, pending funding? How might the Trust fund the adoption of these technologies to contribute to Maine’s beneficial electrification goals?

11. In the event that the Trust receives significant revenues from Alternative Compliance Payments through Maine’s Renewable Portfolio Standard (RPS), what should be the objective(s) for the use of these revenues and what strategy or approach should be used to achieve those objectives?

3.3 Confidential Information

Respondents should be aware that information received in response to this RFI may be considered in the drafting or implementation of the Triennial Plan and will be available to the public. Interested parties who claim that certain information is confidential must label relevant sections or pages as “Confidential Information” and request that the Board of Trustees consider such a designation. See <http://legislature.maine.gov/statutes/35-A/title35-Asec10106.html> for more information on confidential information.

3.4 Disclaimer

This RFI is not a Request for Proposals (RFP), Request for Qualifications (RFQ), or Program Opportunity Notice (PON). Information submitted in response to this RFI may be considered by the Trust for planning and implementing the Triennial Plan. The Trust does not plan to issue a specific RFP, RFQ, or PON based on or related to responses to this RFI.