

Comments submitted by:

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Page Number and/or Section	Comment	Recommendation where applicable.
Pg 37 Energy Consumption Forecasting	The RIC should set a requirement for better forecasting by T&TEC. Where multiple forecasting models are implemented. The use of AI and Machine learning forecasting should also be utilized. Has an increase in EV uptake been accounted for in the forecast?	Partner with the universities to help with forecasting.
Operating expenditure pg 57	Please consider stating which utilities and jurisdictions were T&TEC benched marked against?	
Pg 59	Please state which countries and utilities were used to compare the overtime expenditure and absenteeism rate?	
Table 7.1 Pg 62	The percentage in the last column should be calculated using the approved opex and not the actual.	
7.5.2.7 Prescriptive Annual Targets Pg 76	Has the RIC contacted CARILEC for the benchmarking of regional power utilities? If yes this should be mentioned.	
Pg 187	Can you provide a reference for the United Nations guidelines on the percentage of income that should be spent on utilities.	The use of the 2008/2009 Household Budgetary Survey (HBS) to estimate the welfare impact of the rate increase is contentious. There are developmental organisations that are currently conducting surveys with information that is relevant to estimating the

		<p>impact of the rates on the population(consult the UNDP GCCA+ project). Alternatively, the RIC can commission its own HBS to estimate the impact of the rates.</p>
General and Overarching Comments		
Comment		Recommendation
<p>Please consider clearly summarize for the reader the measures in placed in PRE2 to ensure that T&TEC does not have a vast variance between approved and actual Opex for labour (27%) , Transmission and Distribution (25%) and administration and general (33%) as seen in PRE1.</p>		
<p>The Prime Minister at COP26 in Glasgow in 2021 committed T&T to 30% Renewable Energy generation by 2030. The planning and commitment that would be required for 30% RE generation by 2023 is not reflected in PRE2. Technical studies essential for the increase penetration of RE generation are not a requirement in PRE2. These technical studies include but are not limited to utility scale grid integration studies, solar PV hosting capacity studies for the major distribution feeders and the development of grid codes.</p>		<p>The RIC and T&TEC has been a stakeholder in the development of the Integrated Resource and Resilience Plan (IRRP) for Trinidad and Tobago. The IRRP has been funded by the CCREEE and the final document is with the MPU. The IRRP introduces the technical studies and has preliminary results. Please do not use the representative and preliminary results of the CCREEE IRRP as a substitute for a comprehensive and complete technical study.</p>
<p>The number of reports required by T&TEC during PRE2 is reflective of the total absence of any planning initiative along with any robust data collection framework to allow for evidence base and data driven decision making and long-term planning.</p>		<p>The RIC would have to required systemic structural changes to the process of data collection, reporting and decision making.</p>