

NEW HAMPSHIRE



ENERGY EFFICIENCY AND SUSTAINABLE ENERGY BOARD

RSA 125-O:5-a  
21 South Fruit Street, Suite 10  
Concord, N.H. 03301-2429

April 3, 2015

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

Re: Docket No. IR 15-072, Electric and Natural Gas Utilities’ Energy Efficiency Investigation

Dear Ms. Howland:

Thank you for the opportunity to provide comments relative to the Order of Notice dated March 13, 2015 in the above-referenced docket. These comments are submitted on behalf of the Energy Efficiency and Sustainable Energy Board (EESE Board) in response to the questions raised in the Order of Notice. The EESE Board was established<sup>1</sup> “to promote and coordinate energy efficiency, demand response, and sustainable energy programs in the state.”

First, the members of the Board would like to thank the staff of the NH Public Utilities Commission, particularly Les Stachow, for their diligent efforts relative to the report, “*Energy Efficiency Resource Standard: A Straw Proposal for New Hampshire*,” released February 3, 2015. Mr. Stachow’s presentation of this report to the Board at our February 20, 2015 meeting was very informative and comprehensive.

The Board discussed Order of Notice IR 15-072 at its March 19, 2015 meeting and, in general, the discussion was supportive with respect to the recommendations in items 1, 2 and 3 of the Order. However, due to the short timeframe, some Board members were not able to take a formal position with respect to Items 2 and 3. Item 4 of the Order was not specifically discussed.

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<sup>1</sup> RSA 125-O:5-a

Relative to Item 1 of the Order, the EESE Board has communicated numerous times that the State should establish an EERS for electric and natural gas utilities and agrees with this recommendation to do so. This position is clearly articulated in the EESE Board's *Final Report On the New Hampshire Independent Energy Study*,<sup>2</sup> in which the EESE Board stated that "the state should develop an Energy Efficiency Resource Standard as a means to promote cost-effective energy efficiency as the first priority energy resource of choice for New Hampshire." This same position was also expressed in an EESE Board letter to the Governor's Office of Energy and Planning relative to the State Energy Strategy<sup>3</sup>. Additionally, the straw proposal at the heart of this investigation was issued in response to the EESE Board request that the PUC initiate an informal, non-adjudicative stakeholder process regarding the potential for a New Hampshire EERS in a December 23, 2013 letter to the Commission<sup>4</sup>.

With respect to Item 2 in the Order, recommending an initial ten-year period for an EERS with interim short-term goals, the EESE Board cannot offer a consensus position at this time, but notes that in some of the same documents noted above the Board has consistently reiterated the need for a stable, long-term energy policy in the state, which would conceptually lend support to establishment of a long-term EERS goal. Likewise, the EESE Board does not have a consensus position relative to Item 3, but there was discussion regarding time needed to ramp up a program to achieve greater efficiency savings.

There are many complex issues to be evaluated in establishing an EERS for New Hampshire. The EESE Board requests the Commission hold one or more informal technical sessions in order to ensure adequate opportunity for Board members and the public to provide additional input prior to any final Commission order relative to an EERS. The Board would like to offer our monthly meeting as a forum for such a session in order to find consensus as quickly as possible on this matter of great importance.

Thank you again for the opportunity to provide input on this Order of Notice. I anticipate that individual EESE Board members, on behalf of the organizations they represent, will also participate in the investigation and respond to the Order of Notice as appropriate.

Sincerely,



Kate Peters  
Acting Chair, EESE Board

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<sup>2</sup> *Final Report On the New Hampshire Independent Energy Study*, November 30, 2012, <http://www.puc.nh.gov/EESE%20Board/Annual%20Reports/VEIC%20-%20EESE%20Board%20Report%20-%20FINAL%20FULL%20113012.pdf>

<sup>3</sup> <http://www.puc.nh.gov/EESE%20Board/Meetings/2014/20140718Mtg/07-21-14%20State%20Energy%20Strategy%20Final%20Letter.pdf>

<sup>4</sup> <http://www.puc.state.nh.us/EESE%20Board/MeetingsPastYears.htm>