STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION DOCKET No. DE 09-170

2010 CORE ENERGY EFFICIENCY PROGRAMS

Rebuttal Testimony of Carol Woods New Hampshire Electric Cooperative, Inc.

1	Q.	Please state your name, place of employment and your position.
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3	A.	My name is Carol Woods. I am employed by the New Hampshire Electric Cooperative, Inc.
4		as Energy Solutions Manager. I am responsible for the implementation of the CORE Energy
5		Efficiency Programs at NHEC, and I have served in that capacity for 7 years.
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7	Q.	Have you reviewed the direct prefiled testimony of Stephen R. Eckberg on behalf of the
8		Office of the Consumer Advocate in this docket?
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10	A.	Yes, and the purpose of my testimony here is to address Mr. Eckberg's testimony,
11		specifically with respect to the Load Management Program.
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13	Q.	What did the OCA recommend with respect to NHEC's utility-specific filing?
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15	A.	The OCA recommended that NHEC should no longer receive CORE SBC funding for the
16		NHEC load management program. See pages 9-11 of Mr. Ekberg's direct prefiled testimony.
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18	Q.	Please explain what the load management system is.
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20	A.	The load management system is a demand-side management technique that NHEC has
21		offered since 1993, with the approval of the PUC. By means of a radio-controlled switch,
22		NHEC can turn off or control electric baseboard heat and electric water heaters in the homes
23		of participating members. The SBC funding for this measure is used to maintain the system
24		at the members' locations.
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26	Q.	Do you agree with the OCA's recommendation?

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- 1 A. No, I do not.
- 2 **O.** Why not?

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- A. Load management produces savings for the members and reductions in the use of electricity.

 Load management reduces the total amount of capacity which is needed and thus reduces the
 need to build additional transmission lines or substations. With approximately 5000 NHEC
 members participating in the load management program, this program is the largest of all the
 NHEC energy efficiency programs except for Energy Star® Lighting, and it undoubtedly
- o NATEC energy efficiency programs except for Energy Stars Eighting, and it undoubted
- 9 provides the most significant impact of any of the efficiency programs offered by NHEC.

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Q. Please describe the benefits of this program in more detail.

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A. Load management works by controlling load and thus reducing the costs relating to transmission and capacity. Let me address each piece individually.

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The transmission piece looks to obtain a reduction in the PSNH Interconnection and Delivery Agreement charges. These charges are based on the monthly peak half-hourly KVA during the on-peak period per delivery point, subject to a 70% ratchet. Since NHEC is no longer a wholesale customer of PSNH, the rate is essentially a rate for the transmission of power from the NU Local Transmission System to NHEC's delivery points. NHEC aims to reduce these costs primarily by controlling load during the winter months, and especially by controlling the load at the delivery points closest to our ski areas, which are subject to the demand ratchet. The ratchet benefit at the Thornton and Woodstock delivery points is typically for 8 to 9 months (along with the monthly benefit of reduction demand for that month). The demand ratchet for the North Conway delivery point is usually about 6 months, as its summer peak loads are typically greater than 70% of its winter peak because of summer tourism and the air-conditioning load at the area shopping centers.. A 1 kW load reduction

at the time of the winter peak at Thornton and Woodstock is typically worth at least \$6.49, and at North Conway \$5.10. NHEC controls loads at its other delivery points also; however, those benefits are not quite as significant as the Thornton, Woodstock and North Conway areas. The reduction of the Interconnection and Delivery charges reduces the Regional Access Charges, a reconciling rate, to our members.

In addition, transmission charges (i.e., monthly charges for local area network service (LNS) and regional network service (RNS)) are rising. In order to save on these rates, NHEC's load coincident with NU's monthly peak must be reduced. This is challenging to predict and applies monthly rather than for a single hour/year. However, the benefits (especially during the winter when both water and space heating can be controlled) are significant and rising. Currently, the RNS rate is about \$5.23/month, while the LNS rate is based on annual revenue requirements and varies somewhat month to month based on NHEC's pro rata share of the total network load. A total charge of almost \$6/month per kW is a reasonable estimate for the rate for this winter. Accordingly, if 1 kW was controlled for three winter months, the savings would be \$18/year. Transmission costs are also recovered through the Regional Access Charge; therefore, these savings reduce that charge for our members as well.

With respect to capacity, the load management benefit pertains to the ISO-NE summer peak load. The ISO-NE monthly capacity market rate is currently \$4.10 and will increase to \$4.50 in June of 2010. At \$4.10, a 1 kW reduction in NHEC's load would save over \$49.20 for the year (supply resources receive \$4.10/month and currently are well in excess of load, resulting in load also paying its share of the excess). NHEC recovers the costs of the capacity market for members receiving Co-op Power through its Co-op Power Charge, a reconciling rate. Therefore, savings are directly received by NHEC's members.

Q. How many NHEC members have controlled load?

A. Approximately 4000 members have had water heater controls installed. About 1000 additional members have had Electric Thermal Storage (ETS), Dual Fuel (DF) or Storage Water Heater (SWH) controls installed. This means that about 6000 NHEC members participate in this program - in other words, 7% of the membership.

Q. What sort of information can you provide concerning the results of the load management program?

A. There are three main reasons why we know the load management program is successfully reducing load and costs. First, as discussed above, it is logically the case that these reductions will occur if a program is in place. Second, we are working with technology which has been proven over the course of 20 years, we know what the technology is connected to, and we know that the technology works. Third, we know from eyeballing our load measuring devices that, when a command goes out to control load, there is in fact an actual reduction in the load.

Unfortunately, we cannot currently measure with specificity what we actually are achieving through the load management system. This is because the system utilizes a one-way signal to the switches in the members' homes, and does not receive any data back. The last time that NHEC performed an analysis of the benefits regarding controlled load on its system was in 1996. At that time, savings were estimated at 6 kW savings for each member with electric thermal storage, 2.8 kW for each member with dual fuel installation, and .6 kW for standard and storage water heating.

Q. What sorts of measurements are being done or are in the planning stages?

A. Fortunately, NHEC is in the process of establishing a two-way communication system with load control, which will allow us to provide some definitive data concerning the impact of the system. NHEC has recently installed new software which will allow us to obtain information about actual load reduction results. As this software is used over the course of 2010 and especially the summer months, we expect to be in a far better position with respect to our ability to specifically measure the results of the load management program.

In addition, we have received two federal grants regarding the Smart Grid system. One of those grants is for the purpose of conducting a demonstration which involves the establishment of a two-way system with respect to 500 NHEC member meters. We expect to have those meters deployed over the next few years. The other grant is a full-scale two-way system on all NHEC meters. Obviously, with each step toward the full construction of Smart Grid, we will have access to better metrics concerning how the load management program is working.

Q. Do you agree that SBC funding of this program should be dropped?

A. No, I do not. This program has been in place for 16 years, and it has consistently been part of NHEC's CORE filing each year. A substantial number of our residential members participate in this program, and they have now invested in the equipment and opted for ETS over other heating systems. We think that the benefits discussed above provide sufficient justification for the existence of the load management program and its funding through the SBC. The fact that new diagnostic tools will be in place during the course of the coming year means that we are likely to have better measurements a year from now and even better measurements the year after that. Thus, even assuming for the sake of argument that the funding of the program ought to be discontinued at some point, this is not the right time to make that decision. It will be more beneficial to energy efficiency efforts and to the

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1 members of NHEC if funding of this program is allowed to continue, at least pending the 2 receipt of the information which we expect to have available during the course of 2010. 3 4 Q. So what is your recommendation with respect to the OCA's testimony on the load 5 management program funding? 6 7 A. I recommend that the SBC funding of the load management program continue as provided in 8 the September 30, 2009 CORE utility-specific filing, page 32. This is with the understanding 9 that, during 2010, NHEC will be able to develop and produce more detailed information 10 concerning the impact of the load management program. 11 12 Q. Is this the end of your testimony? 13 A. Yes it is. 14