

STATE OF NEW HAMPSHIRE
before the
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DG 16-769

Concord Steam Corporation,
Petition for Emergency Rates and Discontinuance of Service

and

DG 16-770

Liberty Utilities (EnergyNorth Natural Gas) Corp., dba Liberty Utilities and
Concord Steam Corporation,

Join Petition for Approval of an Asset Purchase Agreement

**THE JORDAN INSTITUTE'S
PETITION TO INTERVENE**

NOW COMES The Jordan Institute (Jordan Institute), pursuant to RSA 541-A:32,I(b) and New Hampshire Administrative Rule Puc 203.17, respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) for intervention as a full party in the above-captioned proceeding. However, it is The Jordan Institute's intention to limit our participation to issues associated with energy efficiency. In support of this petition, Jordan Institute states:

1. Jordan Institute has an interest in the issues cited by the Commission in its July 26, 2016 Orders of Notice regarding the aforementioned dockets and the role that energy efficiency may/should play in buildings affected by the discontinuance of services by Concord Steam and the purchase of assets by Liberty Utilities.

2. Jordan Institute is a New Hampshire-based 501(c)3 non-profit organization focused on energy efficiency and renewable energy – public policy, program design and administration, and project implementation.
3. As reiterated in the 2014 New Hampshire 10-Year State Energy Strategy, energy efficiency is considered a least-cost resource.
4. In 2013, Jordan Institute launched a for-profit subsidiary, Resilient Buildings Group, Inc. (RBG), that provides technical and building-science services such as energy audits, project consulting, commissioning, monitoring and verification, and energy-centric construction management. From our experience, we know that the buildings on the Concord Steam district heating system face numerous challenges regarding energy use and costs, comfort, and durability.
5. Jordan Institute has launched a C-PACE energy-project financing program that connects private investment to privately owned commercial buildings and incorporates energy audits and quality control measures to ensure energy savings are realized and that projects are cash-positive. Hanover adopted the C-PACE statute, RSA 53-F, in early May 2016 and recently contracted with Jordan Institute to administer the program on their behalf. We are working with other municipalities – including Concord – in the hopes that they, too, will adopt the statute and work with us.
6. Jordan Institute has been working with a number of Concord Steam customers who own commercial buildings and are considering making upgrades to their facilities. The schedule for discontinuance of services – May 31, 2017 – is fast approaching. In our experience, comprehensive energy projects take time to analyze the buildings' needs, the occupants' desires, the engineering, the financing or fund-raising, and the actual

implementation. We are very concerned that this expedited time frame will not leave building owners enough time to make thoughtful decisions about their options, and instead may feel compelled to make long-term commitments to systems or technologies when other alternatives may be appropriate.

7. Moreover, in many cases, space for new heating equipment will need to be carved out from existing space in buildings. Building owners will need to repurpose sections of their buildings to accommodate new equipment. Because chimneys have not been necessary in these buildings historically served by the off-site Concord Steam facility, condensing boilers will be appropriate replacements. There is a range of efficiency for these systems, and only those with an AFUE 92% qualify for NHSaves rebates. We understand that the queue for 2017 NHSaves rebates has already begun, and that it is likely that rebate program will be over subscribed. Furthermore, some of the boilers needed to meet heating requirements in buildings may necessitate a custom-build, which also takes time.
8. In our experience, many of the commercial buildings in downtown Concord have significant opportunities to make energy-efficiency upgrades. Such undertakings greatly improve the experience of the occupants, improve the resiliency of the buildings, and in many cases improve the value of the buildings. It is very important to deploy these measures in the proper sequence. New heating equipment is often oversized to reduce call-backs from contractors on the very coldest nights. If a new boiler is installed before air-sealing, insulation, improved controls and distribution, or other measures are addressed, the boiler will most definitely be over-sized and will not run as efficiently, will cycle on and off more often leading to increased wear and tear, and will waste fuel.

9. Making these improvements is not free. If Concord adopts RSA 53-F in a timely fashion, some building owners may choose to finance their projects through the C-PACE program. For others, they must either finance for much shorter terms or quickly raise the funds to pay for these measures. For non-profits, this will be particularly challenging as grant cycles often run on year and 18-month schedules, and fundraising for operational/overhead costs is an ongoing challenge for most non-profit organizations.

10. Jordan Institute has intervened in other dockets including the Energy Efficiency Resource Standard and Core Energy Efficiency programs, Net-Metering, Grid Modernization, and has participated in program design regarding solar and wood pellet system rebate programs.

11. Jordan Institute's intervention in this docket would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings. If granted intervention status, Jordan Institute will abide by the Commission's rules and procedural schedule developed in his docket and make every effort to work collaboratively with the Staff and other parties.

WHEREFORE, JORDAN INSTITUTE respectfully requests that this Honorable Commission grant this Petition and allow Jordan Institute to intervene as a full party in this proceeding, and to grant such other relief as the Commission finds just and proper.

Respectfully submitted,



Laura Richardson
Executive Director
The Jordan Institute