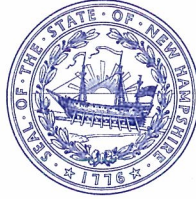


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April 3, 2015

Debra Howland
Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, New Hampshire 03301-7319

NHPUC APR03'15 PM 1:54

RE: IR 15-072 Energy Efficiency Investigation
Office of the Consumer Advocate's Comments

Dear Ms. Howland:

On February 3, 2015, the New Hampshire Public Utilities Commission (Commission) received a filing from its Staff entitled "Energy Efficiency Resource Standard (EERS): A Straw Proposal for New Hampshire" (Report). On March 13, 2015, the Commission initiated a non-adjudicative investigation docket, IR 15-072, inviting input on or before April 3, 2015, from stakeholders to consider next steps in multiple phases. In the first phase, the Commission seeks to identify points¹ of consensus on Staff's recommendations that:

- 1) The Commission should establish an EERS for electric and gas utilities at this time;
- 2) The Commission should establish the EERS for an initial period of ten-years, with interim, short-term goals approved by the Commission;
- 3) The Commission set the first two-year EERS goals consistent with the CORE goals established for 2015 and 2016 (Docket 14-216); and
- 4) Any other Staff short-term recommendation that the Commission may be required to act upon to implement the three recommendations listed above.

The Office of the Consumer Advocate (OCA) appreciates the opportunity to participate in this docket, and provides the following input.

The OCA supports recommendation (1) that the Commission should establish an EERS at this time. The OCA supports the Commission Staff's recommendation (2) to implement an EERS for ten-years, with interim, short-term goals approved by the Commission. The OCA also supports

¹ Order of Notice (March 13th, 2015), Pages 2-3.

recommendation (3) to integrate EERS goals for the first two years with the CORE goals for 2015 and 2016. As for input on any other short-term recommendation by Staff (4), the OCA stresses the importance of pursuing cost-effective energy efficiency measures even when implementing EERS in the short-term. To the extent it may be more efficient, the OCA supports the consideration of Staff's EERS short-term recommendations for implementation in the CORE docket, DE 14-216, before, or at the time of, the 2016 mid-course review consistent with the Commission's approval of the 2015-16 programs.

While the OCA appreciates the opportunity to provide its input on the issues discussed above, these comments are preliminary. The OCA is not weighing in substantively on other short-term considerations at this time and looks forward to reviewing input from other stakeholders in the forthcoming stages of this proceeding. The OCA will appropriately weigh in on other considerations, both short term and long-term, as the record in Docket No. IR 15-072 develops.

Thank you for the opportunity to present these comments. We appreciate the Commission Staff's efforts in drafting the Report entitled "Energy Efficiency Resource Standard: A Straw Proposal for New Hampshire".

Respectfully,

Susan W. Chamberlin
Consumer Advocate

cc: Service List via electronic mail