

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. DE 17-136**

**Date Request Received: 10/05/2018**

**Request No. OCA 2-011**

**Request from: Office of Consumer Advocate**

**Date of Response: 10/19/2018**

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**Witness: Katherine W. Peters**

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**Request:**

Reference the EESE Board resolution of July 11, 2017 directing the utilities to “consider adding certain pilot projects to the Plan, e.g., geo-targeting,” and to “review similar programs ongoing in other states to determine how the results of those pilot programs may inform efforts in New Hampshire.”

- a. If the utilities have not included any such pilot using the geo-targeting of energy efficiency in the 2019 update of the 2018-20 plan, please describe why not.
- b. Please provide any review of geo-targeting or non-wire alternatives programs the utilities have now performed as a means of preparing for such efforts in New Hampshire.

**Response:**

As an initial matter, the utilities disagree with the premise of the question. For clarity, the document to which the question links is a list of recommendations made on July 11, 2017 by the EERS Committee of the EESE Board which, according to the EESE Board’s July 21, 2017 minutes was adopted by the Board. As additional information, the Board was then to take those recommendations and draft a letter “to be submitted to the Commission, and copied to utilities and the EESE Board.” EESE Board July 21, 2017 Minutes at page 2. It appears no recommendation letter of the EESE Board itself was ever submitted to the Commission, the utilities or the Board.

The EERS Committee recommendation adopted by the Board indicates “that the Board *ask* the utilities *to consider* adding certain pilot projects to the Plan, e.g., geo-targeting, strategic energy management, and connected devices & fixtures.” Recommendation at 5 (emphases added). Thus, the EESE Board did not “direct” anything relative to pilot programs and the OCA’s implication that the utilities did not abide by a directive of the EESE Board is wrong.

Furthermore, in the 17 EERS Committee meetings and 5 stakeholder workshops that took place between August 30, 2016 and July 18, 2017 there is no mention in the posted minutes or materials of any significant discussion regarding geo-targeting as a potential element of the 3-year Plan. Geo-targeting appears in the EERS Committee recommendation as an example of the type of pilot projects the Board could ask the utilities to consider including. As a topic it did not receive any of the extensive stakeholder discussion and vetting that occurred with other recommended elements that were ultimately included in the 2018-2020 Plan.

- a. As to the question itself, the scope of this docket was described both on page 8 of the April 27, 2016 settlement in Docket DE 15-137 and on page 62 of Order No. 25,932 approving that settlement. That Order reads, in relevant part and with emphasis added:

We approve the Settling Parties' recommendations for an EERS process, including the pre-filing collaborative preparation of a plan for the first triennium with the assistance of a planning expert. We agree that such a process will likely result in a more efficient and less adversarial adjudicative proceeding following the plan's filing for Commission review and approval. **An abbreviated annual plan update process during the trienniums, like the process we currently use for the Core docket, is appropriate and will enable the stakeholders some flexibility to respond to developments in the energy efficiency market during that time.**

Geo-targeting was not included as an element of the 2018-2020 Plan that was approved in Order No. 26,095. This docket is intended to be an update for the 2019 program year that would be reviewed in an abbreviated process. Accordingly, there are no new geo-targeting pilots in this update to the plan.

- b. Geo-targeted energy efficiency is typically considered as part of the distribution planning process on a case by case basis. In that process multiple factors must be accounted for including not just the absolute size of the need but also when the need is occurring, the duration of the need, whether the solutions are needed due to load growth or due to end-of-life or other necessary equipment upgrades, and the potential for achieving the necessary results through energy efficiency or other non-wires alternatives. The planning must be geared toward achieving an operational outcome and in almost all instances, the wires alternative provides a more comprehensive and cost effective solution.

Review of geo-targeted energy efficiency options will continue to be a part of the distribution planning process and to the extent that it presents a viable solution for a particular situation, the utility would move forward with a discussion and planning process for implementation.

In November 2017, Liberty filed for a battery storage pilot (Docket No. DE 17-189) which included 1000 behind-the-meter Tesla Powerwall 2 installed in customer homes. The purpose of the installations was two-fold: reduce transmission costs and provide a non-wires alternative (NWA) to a circuit that was at capacity. During the course of the proceeding, the OCA provided testimony that included adding targeted energy efficiency measures to the NWA portion of the program. The Company included in its benefit cost model the targeted energy efficiency measures on its 11L1 circuit in West Lebanon as part of the development of a robust benefit cost model for the non-wires alternative portion of its battery storage pilot. Please see Attachment OCA 2-011b.

(Joint Utility Response)