



**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Docket No. DG 17-152

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Least Cost Integrated Resource Plan

DIRECT TESTIMONY

OF

ERIC M. STANLEY

June 28, 2019

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Eric M. Stanley. My business address is 15 Buttrick Road, Londonderry, New
4 Hampshire.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Liberty Utilities Service Corp., which provides services to Liberty
7 Utilities (Granite State Electric) Corp. and Liberty Utilities (EnergyNorth Natural Gas)
8 Corp. (“EnergyNorth” or the “Company”).

9 I am the Manager of Energy Efficiency and Customer Programs at Liberty Utilities for
10 New Hampshire. My primary responsibilities are the planning, marketing,
11 implementation, and reporting of the Company’s electric and natural gas energy efficiency
12 programs in the state.

13 **Q. Please state your educational backgrounds and professional experiences.**

14 A. I received an MBA from Southern New Hampshire University in 2015 and a Bachelor’s of
15 Science degree in Business Administration from the University of New Hampshire in 2000.
16 Since 2012, I have worked as Liberty Utilities’ Manager of Energy Efficiency and
17 Customer Programs in New Hampshire. Prior to this role, I worked at National Grid from
18 2001 to 2012 in a variety of capacities including, most recently, as the Manager, Marketing
19 Strategy – Energy Efficiency from 2009 to 2012 where I was responsible for developing
20 energy efficiency marketing strategies across their businesses in Massachusetts, New
21 Hampshire, New York, and Rhode Island. From 2007 to 2009, I was the Manager of

1 Natural Gas Residential Advertising, responsible for all customer growth direct marketing
2 activities. From 2004 to 2007, I was a Senior Marketing Analyst responsible for new
3 product and gas growth marketing activities. From 2001 to 2003, I was an Energy
4 Efficiency Analyst, responsible for planning and evaluation activities related to National
5 Grid's Massachusetts natural gas energy efficiency programs. From 1999 to 2001, I was
6 an Analyst for Ellacoya Networks responsible for competitive and market intelligence
7 research and data analytics.

8 **Q. Have you previously testified before this Commission?**

9 A. Yes. I have testified in numerous proceedings before the Commission.

10 **Q. On whose behalf are you testifying?**

11 A. I am testifying on behalf of EnergyNorth.

12 **Q. What is the purpose of your testimony?**

13 A. The purpose of my testimony is to briefly describe the Company's natural gas energy
14 efficiency programs in New Hampshire, the relative strategy and achievements of the
15 programs over time and in comparison to other natural gas utilities in New England, in
16 order to demonstrate that the Company's assumption of demand reduction from these
17 energy efficiency efforts was reasonable.

18 **Q. Please provide a description of the Company's programs.**

19 A. EnergyNorth offers a comprehensive suite of natural gas energy efficiency programs
20 available to its entire base of residential, income-eligible, multifamily, commercial,
21 industrial, and municipal customers. Specific measure offerings include services such as

1 energy audits, air sealing and weatherization, engineering and technical analysis, building
2 plan energy efficiency certification and verification service, and prescriptive and custom
3 incentives for natural gas devices such as: building control systems and thermostats,
4 furnaces, boilers, water heaters, chillers, energy recovery ventilation systems, combined
5 heat and power systems, spray valves, faucet aerators and showerheads, ovens, fryers,
6 griddles, and steam cookers. The Company offers various types of incentive formats for
7 customers to participate in its energy efficiency offerings such as discounted purchase
8 prices at retailers and equipment distributors, mail-in and online rebate applications, third-
9 party and on-bill financing, in addition to free and no-cost services depending on the
10 customer type and specific efficiency measure. The Company also offers energy efficiency
11 education, training, and curriculum programs for K-12 students, contractors, residential
12 and non-residential customers. Lastly, the company provides personalized home energy
13 reports to a portion of its residential customers that depicts a comparative analysis of
14 customer's energy usage.

15 Complete details of the Company's energy efficiency offerings are found in the 2018–2020
16 New Hampshire Statewide Energy Efficiency Plan, revised on January 12, 2018, as part of
17 NHPUC Docket No. DE 17-136, and attached as Exhibit A.

1 **Q. How do the specific energy efficiency program offerings provided by the Company**
2 **compare with other natural gas utilities in the New England?**

3 A. Beginning with the inception of the Company's energy efficiency programs in New
4 Hampshire in 2003,¹ where the programs were modeled after what the Company's sister
5 business was delivering for natural gas energy efficiency programs in Massachusetts, the
6 Company's energy efficiency portfolio strategy has essentially followed this same
7 approach, where there are very few, if any, exceptions in terms of the types of services
8 available to customers and what types of natural gas energy efficiency measures can be
9 incentivized in New Hampshire as compared to those in Massachusetts. The Company has
10 also been consistently engaged in regional natural gas program offerings in partnership
11 with the other New England states, such as the GasNetworks®² program, where identical
12 program measures, delivery mechanisms, and relative incentive levels are brought to the
13 market and leveraged. In some cases, the Company has even been one of the first to
14 introduce energy efficiency incentives for certain groundbreaking technologies. Recent
15 examples include the piloting of an innovating polymer bead commercial washing
16 technology in 2014, which was one of the first-of-its-kind to be tested, evaluated, and
17 incentivized by a natural gas utility in the United States,³ and in 2017 a unique pre-rinse
18 spray valve device that is used specifically in beauty salons.⁴

¹ NH Public Utilities Commission (December 31, 2002). DG 02-106, EnergyNorth Natural Gas, Inc. d/b/a KeySpan Energy Delivery New England and Northern Utilities, Inc. "Energy Efficiency Programs for Gas Utilities. Order Approving the Settlement Agreement." Order No. 24,109. p.5.

² Gas Networks (2019). "Gas Networks Member Companies and Service Areas." Retrieved from <https://GasNetworks.com>

³ RISE Engineering (2014, February 11). "Xeros Laundry Technical Assessment Study: Final Report"

⁴ ECOHeads (2019). Showerheads. <https://ecoheads.com/>

1 **Q. How do the Company's energy efficiency programs compare quantitatively to other**
2 **natural gas utilities in New England?**

3 A. Table 1 below depicts a sampling of natural gas utilities across New England and their
4 respective natural gas energy efficiency sales reduction targets in 2018 relative to their
5 actual annual sales volumes. As shown, EnergyNorth's natural gas energy efficiency
6 annual savings target in 2018 compares favorably to the other New England natural gas
7 utilities depicted, only being exceeded by National Grid and Eversource in Massachusetts,
8 who have more than eight and four times the respective natural gas sales volume as Liberty
9 Utilities in New Hampshire.

Table 1. Natural Gas Utility Energy Efficiency Sales Reduction Targets, 2018			
Utility	2018 Natural Gas Annual Savings Target (MMBtus)	2018 Natural Gas Sales (MMBtus)	Ratio of Savings Target to Sales
National Grid (MA)	1,725,114⁵	155,603,750⁶	1.11%
Eversource (MA)	663,225⁷	72,623,600⁸	0.91%
Liberty Utilities (NH)	130,072⁹	17,868,268¹⁰	0.73%
Columbia Gas (MA)	420,827¹¹	59,822,202¹²	0.70%
Connecticut Natural Gas (CT)	230,641¹³	37,995,000	0.61%
Berkshire Gas Company (MA)	53,815¹⁴	10,545,000¹⁵	0.51%
Southern Connecticut Gas (CT)	175,428¹⁶	36,251,000¹⁵	0.48%
Unitil (NH)	33,544⁹	8,621,418¹⁷	0.39%

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⁵ National Grid (2015). 2016-2018 Plan Data Tables National Grid Gas. Retrieved from <http://ma-eeac.org/wordpress/wp-content/uploads/Exhibit-4-2016-2018-Plan-Data-Tables-National-Grid-Gas.xlsx>

⁶ National Grid (2019). Statement of Operating Revenues for Boston Gas Company and Colonial Gas Company for Year 2018. Boston Gas Company retrieved from <https://www.mass.gov/files/documents/2019/05/01/Boston%20Gas%202018.pdf>; Colonial Gas Company retrieved from <https://www.mass.gov/files/documents/2019/05/01/Colonial%20Gas%202018.pdf>

⁷ Eversource (2015). 2016-2018 Plan Data Tables NSTAR Gas dba Eversource. Retrieved from <http://ma-eeac.org/wordpress/wp-content/uploads/Exhibit-4-2016-2018-Plan-Data-Tables-NSTAR-Gas-dba-Eversource.xlsx>

⁸ Eversource Energy (2019). Annual Report – 2018. Retrieved from <https://www.eversource.com/content/docs/default-source/Investors/annual-report.pdf>

⁹ NHSAVES (2017, September 1). New Hampshire Statewide Energy Efficiency Plan, 2018-2020. Retrieved from http://www.puc.state.nh.us/Regulatory/Docketbk/2017/17-136/INITIAL%20FILING%20-%20PETITION/17-136_2017-09-01_NHUTILITIES_EE_PLAN.PDF

¹⁰ Liberty Utilities (EnergyNorth Natural Gas) Corp (2019, April 4). Annual Report – Form F-16. Retrieved from <https://www.puc.nh.gov/Gas-Steam/Annual%20Reports/2018/2018-Gas-Annual-Report-Liberty-Utilities-20190520.pdf>

¹¹ Columbia Gas (2015). 2016-2018 Plan Data Tables CMA. Retrieved from <http://ma-eeac.org/wordpress/wp-content/uploads/Exhibit-4-2016-2018-Plan-Data-Tables-CMA.xlsx>

¹² Columbia Gas (2019). Return of the Bay State Gas Company d/b/a Columbia Gas of Massachusetts, 2018. Retrieved from <https://www.mass.gov/files/documents/2019/05/01/CY%202018%20CMA%27s%20Annual%20Return%20to%20DPU.pdf>

¹³ Eversource Energy, The United Illuminating Company, Connecticut Natural Gas, Southern Connecticut Gas (2017, November 1). 2018 Plan Update of the 2016-2018 Conservation & Load Management Plan. Retrieved from https://www.ct.gov/deep/lib/deep/energy/conserloadmgmt/2018_plan_update_11-1-17.pdf

¹⁴ Berkshire Gas Company (2015). 2016-2018 Plan Data Tables Berkshire. Retrieved from <http://ma-eeac.org/wordpress/wp-content/uploads/Exhibit-4-2016-2018-Plan-Data-Tables-Berkshire.xlsx>

¹⁵ Avangrid, Inc. (2018). Form 10-K, for the fiscal year ended December 31, 2018. Retrieved from <https://avangridinc.gcs-web.com/static-files/fecfc11b-aa88-477f-aa85-322d2a6b50dd>

¹⁶ Eversource Energy, The United Illuminating Company, Connecticut Natural Gas, Southern Connecticut Gas (2017, November 1). 2018 Plan Update of the 2016-2018 Conservation & Load Management Plan. Retrieved from https://www.ct.gov/deep/lib/deep/energy/conserloadmgmt/2018_plan_update_11-1-17.pdf

¹⁷ Northern Utilities (2019, April 3). Annual Report – Form F-16 G. Retrieved from <https://www.puc.nh.gov/Gas-Steam/Annual%20Reports/2018/2018-Gas-Annual-Report-Northern-Utilities-20190404.pdf>

1 **Q. Does this conclude your testimony?**

2 A. Yes, it does.

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