



Sustainability is the bottom line.

October 29, 2020

**BICEP Network Members:\***

Adobe Systems Inc.  
**Akamai Technologies**  
Annie's Inc.  
**Autodesk**  
Aveda  
Ball Corporation  
**Ben & Jerry's**  
Biogen  
Burton Snowboards  
Burt's Bees  
Clif Bar & Company  
CommonSpirit  
Danone North America  
DSM  
eBay Inc.  
Eileen Fisher  
Etsy  
Fetzer Vineyards  
**Gap Inc.**  
General Mills, Inc.  
Hackensack Meridian Health  
Happy Family Brands  
IKEA Retail U.S.  
Impossible Foods  
Indigo Ag  
**JLL**  
Kaiser Permanente  
KB Home  
The Kellogg Company  
L'Oreal USA  
LBrands  
Levi Strauss & Co.  
LinkedIn Corporation  
**Lyft**  
Mars Incorporated  
Mass General Brigham  
**McDonald's Corporation**  
**Microsoft Corporation**  
Nature's Path Foods  
Nestlé USA  
New Belgium Brewing  
Nike, Inc.  
**Outdoor Industry Association**  
Owens Corning  
Patagonia, Inc.  
Portland Trail Blazers  
REI  
Salesforce.com, Inc.  
**Schneider Electric**  
Seventh Generation  
SFO  
Sierra Nevada Brewing  
Squaw Valley  
**Starbucks Corporation**  
**Stonyfield Farm**  
Symantec Corporation  
The North Face  
**Timberland**  
Unilever  
**Vail Resorts**  
VF Corporation  
Vulcan, Inc.  
Workday  
**Worthen Industries**

Ms. Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301

RE: Docket No. DE 20-092 2021-2023 Energy Efficiency Plan

Dear Ms. Howland:

I am writing today on behalf of the Ceres BICEP ([Business for Innovative Climate and Energy Policy](#)) Network – a coalition of more than 65 major employers and large electricity customers across the United States, including many with significant operations and facilities in New Hampshire – to express the coalition's support for the proposed Energy Efficiency Resource Standard (EERS) savings targets of 5% for electric utilities and 3% for gas utilities.

Businesses across the United States are increasingly setting goals to cut emissions, invest in clean energy, and reduce energy use. These commitments not only benefit public health and the environment, they also make good business sense. A 2017 Ceres analysis found that renewable energy and energy efficiency investments save U.S. companies \$3.7 billion a year, freeing up significant capital that they can reinvest into their employees, research and development, hiring and operations.<sup>1</sup> Clean energy resources also help businesses hedge against volatile fossil fuel prices and stay competitive in a market where consumers, investors, and employees increasingly expect corporations to demonstrate sound sustainability practices.

This is why New Hampshire businesses are making major investments in energy efficiency that reduce energy waste, generate cost savings, and increase their operational sustainability. Ceres and New Hampshire Businesses for Social Responsibility formed a New Hampshire business coalition of over 120 members, which adopted a set of [clean energy principles](#) that demonstrate corporate support for clean energy policies, including strong state programs to increase the efficiency of energy consuming or producing resources. This is because energy efficiency is the most cost-effective energy resource and essential to achieving greenhouse gas reductions on the timeline and scale needed to avoid the worst impacts of climate change.

The proposed NHSaves program for 2021-2023 and its savings targets of 5% for electricity utilities and 3% for gas utilities holds enormous financial

<sup>1</sup> Ceres. "Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change." <https://www.ceres.org/resources/reports/power-forward-3>

potential with expected savings of \$1.3 billion during the three year program period. These savings targets are an appropriately ambitious next step for the successful NHSaves program, which has resulted in cumulative savings of over \$3.4 billion since its inception in 2002.<sup>2</sup> Short term increases to the System Benefits Charge and the Local Delivery Adjustment Charge should not act as a barrier to the long term cost reductions that would be realized by the ambitious EERS targets proposed in the utility filing for the NHSaves program. Furthermore, the reductions in gas and electricity use over the lifetime of the program will prevent carbon emissions equal to taking nearly one million cars off the road for a year,<sup>3</sup> helping to prevent the worst impacts of climate change and protect the Granite State's natural resources. Adopting the strong EERS targets proposed is not only the right thing to do to protect New Hampshire's environment, it makes good business sense.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne L. Kelly". The signature is fluid and cursive, with a large loop at the end.

Anne L. Kelly  
Vice President of Government Relations, Ceres  
On behalf of Business for Innovative Climate and Energy Policy (BICEP)  
Senior Director, Ceres BICEP Network

\*Ceres BICEP Network members listed in bold above have direct operations in New Hampshire. For more information on the Ceres BICEP Network visit: [www.ceres.org/BICEP](http://www.ceres.org/BICEP). For more information, please contact Dave Robba ([drobba@ceres.org](mailto:drobba@ceres.org)).

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<sup>2</sup> NHSaves "2021- 2023 New Hampshire Statewide Energy Efficiency Plan," <https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-092>

<sup>3</sup> Ibid.