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Sent: Wednesday, December 23, 2020 12:24 PM
To: PUC: <PUC@puc.nh.gov>
Subject: DE20-092s EnergyEfficiency

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Dear PUC Commissioners,

Although I previously submitted comments on DE20-092s Energy Efficiency Resource Standards, I am writing again in response to the favor that PUC staff seems to be giving to the proposal that the carefully crafted and vetted 2021-2023 energy efficiency plan be put on indefinite pause. I have 6 reasons for urging you to move forward with the EERS as agreed to by the stakeholders:

1. The argument for this pause has been advanced by the Business and Industry Association and by an *ad hoc* group of NH legislators. These parties have successfully fought against energy regulations in the past, keeping New Hampshire well behind its neighbors in cutting fossil fuel emissions. Using “COVID” as the reason to pause energy efficiency now seems like a rather cynical ploy.

2. What is true about the parties who oppose enacting the EERS is their political clout—they have managed to advance their arguments with you, despite the fact that they are not stakeholders, not party to the act, not intervenors. I understand they have been joined by the NHPUC Staff in their opposition, and the NHPUC Staff are not stakeholders, party to the act, nor intervenors.

If this policy is not put into effect, it would negate the arguments made by the actual parties to the case: six utilities, five nonprofits, and the NH consumer advocate.

If there were to be a “pause” to this act—which has been agreed upon by those with standing, and countered only by those without standing—would it then be subject to litigation?

3. If the issue is the cost of EERS -- wasn't this ironed out in the various iterations of the agreement? But consider the costs we pay for NOT enacting the EERS. Currently in the United States, we pay \$118 Billion annually on healthcare directly related to the treatment of ailments caused by pollution. Other costly “externalities” that we all pay for, through our taxes, include responding to floods, coastal erosion, fire, and drought (which is hurting our farmers). Those “100 year storms” are occurring at increasing frequency. Penny wise, pound foolish: the relatively small cost for the planned efficiencies are dwarfed by the profound costs of inaction. Energy efficiency can get us halfway to meeting our climate goals. As we fail to act, polluted air makes us more susceptible to the ravages of the COVID virus.

4. The claim that COVID requires us to pause the EERS does not withstand scrutiny. Consider the recent statement of Steven Nadel, executive director of the American Council for an Energy-Efficient Economy (ACEEE): “While some efficiency efforts stalled, others advanced before or during the pandemic... In this pandemic and recession, policymakers can embrace efficiency efforts to help residents reduce their utility bills and to get more people back to work, all while cutting pollution.” (*ACEEE Scorecard*, December 16, 2020)

5. Finally, jobs are at stake. ACEEE's Nadel further notes that, "Across the country, energy efficiency workers lost jobs—with an estimated more than 300,000 still unemployed—pointing to the need for policymakers to help get them back to work." When my family had our home insulated and heat pumps installed, we were putting money into local businesses who employed a small army of local technicians.

6. I am one of many New Hampshire citizens who do not know the legal system, the details of financing or of designing energy solutions. But Consumer Advocate Kreis does speak for all of us citizens who will benefit from the Energy Efficiency plan that so many stakeholders carefully crafted over the last 14 months.

Please adhere to your own policies and respect the wishes of the stakeholders, and the obligation of the state of New Hampshire to protect its citizens from the real danger and costs of unabated pollution.

Thank you for your consideration,

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