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February 22, 2021

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

Re: Docket No. DE 20-092 2021-2023 Energy Efficiency Plan: Proposed Settlement Agreement

Dear Ms. Howland:

On behalf of the 30 alpine and Nordic ski area members of Ski New Hampshire, I write to request the 2021-2023 Statewide Energy Efficiency Plan pending as Docket No. 20-092 not be approved.

Without expressing in great detail, the timing of such an increase on energy-intensive businesses like ski areas could not be worse given the impacts that the coronavirus pandemic is having specifically on our state's ski industry and on the tourism community in general.

That said, even in a world without the body blow of a pandemic, an increase as contemplated in the EERS Plan would be still be significant. For a ski area that uses 8.5 million Kwh a year (which is typical for an average sized ski area with snowmaking), it currently spends over \$1 million on electricity costs. Under the proposed EERS, just the incremental SBC rate changes will increase those electricity costs by over \$45,000 in the first year, by over \$90,000 in the second year and over \$140,000 the third year, and likely at least that amount every year thereafter. That equates to over \$275,000 in just the first three years and likely over \$1.25 million over a decade. This is a substantial drain on ski resort resources and will have a detrimental impact on growth, capital investment, and employment.

As importantly, the justification for the EERS is that the state and its electricity end users will see long-term benefits from this program. Based on typical electricity usage and the proposed charges, even assuming a 5% load reduction achieved via EERS, a ski resort would have to see a 1.75 cent reduction in its rates to compensate for the higher SBC charges. It is difficult to see how wholesale rates or RNS charges will create a drop of 1.75 cents, especially when regional wholesale rates are already historically low near 3.0 cents.

Ski NH and its members believe that consideration of programs like EERS is worthwhile, especially if it can drive better energy efficiency that provides real benefits to end users. Indeed, many of our ski areas have been fortunate enough to take advantage of funding programs through Eversource and the NH Co-Op and have made great progress on their efficiency improvement efforts. Yet we also firmly believe that the advocates for programs like these MUST provide quantifiable analysis and justification for imposing much higher costs on electricity customers. Based on a review of a typical ski area, the program will mostly raise electricity costs and not provide any substantial benefits, except for those who

are in a position to spend capital and thus receive funds under the program. Even then, only a fraction of the cost of any sort of energy efficiency expenditures that our ski areas might make under the program are covered.

Thank you for your time and the opportunity to express the views of NH's ski industry relative to these proposed sharp increases during the height of a pandemic. We urge to delay their implementation and to also consider a more modest adjustment to the systems benefit charge.

Sincerely,

Jessyca Keeler
President
Ski New Hampshire

Cc: Governor Christopher T. Sununu
Senate President Chuck Morse
State Senator Donna Soucy
House Speaker Sherman Packard
Representative Renny Cushing