

From: Bruce Berk <bruce.berk.nh@gmail.com>
Sent: Wednesday, November 24, 2021 11:55 AM
To: PUC: <puc@puc.nh.gov>
Subject: Oppose DE 20-092 order

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

November 22, 2021

Public Utilities Commission
21 S Fruit St #10
Concord, NH 03301

RE: DE 20-092 (NHSaves energy efficiency)

Dear Commissioner,

I have followed the 2021-2023 triennial energy efficiency program settlement negotiated over the past year, and the proposed November 12th PUC order (the Order). One can only conclude that it is a flawed plan creating upheaval in the NH energy markets. On the one hand, it hamstringing on-going successful energy efficiency programs and on the other hand, it has too many unresolved questions - hurting consumers, businesses and the environment.

The best short term solution is to allow a rehearing of DE 20-092.

The NH Saves: Program Highlights 2018-2020 executive summary notes the unqualified success of energy efficiency. During the program's lifetime enough energy has been saved to power over 535,000 houses for a year, that every dollar invested in energy efficiency has generated \$3.37 in benefits, and over 1.4 million projects were completed and nearly 3.4 million tons of CO2 were reduced. This order has dire real life implications for low income NH citizens who are struggling to heat their homes.

<https://www.flipsnack.com/evradvertising/nhsaves-program-highlights-2018-2020/full-view.html>

Equally important, the November 19th EESE meeting exposed the Order as ill-conceived in its proposed parameters. Almost without exception, stakeholders from across the legislative, business, consumer, environmental and utility community see it as ambiguous, detrimental to businesses and flies in the face of sustainable energy goals. According to meeting participants, "it took a decade to build this program, and now [due to this order] it will take a decade to rebuild the trust of businesses." Additionally, the Order will ensure that all electric New Hampshire electricity rate payers will see higher electric bills because there will be no mechanisms to control electricity consumption, limit peak electricity demand or control transmission costs.

Eversource stated, "they have no fully prepared set of conclusions" but, their litany of concerns for themselves and for other utility companies makes their position clear. A sampling:

-How to navigate the difficulty of reconciling the collection and dispensing of funds in real time while avoiding penalties for overspending?

-How to meet the on-going demand for energy efficiency - which projects can continue and which will have to be cancelled? Specifically, how to manage funding (or lack of funding) for in-progress projects where funding will be capped at 8000 dollars instead of the 20,000 dollar limit contained in the 2021-2023 TEEP Settlement?

-How to manage and revamp already established budgets at year's end?

-How to advise contractors who have "staffed up" to meet the expected demand of the proposed triennial plan. Under what guidelines should they undertake new business?

-How to advise equipment distributors who have to make buying decisions, now, for 2022?

-According to Eversource, clarity is needed on basic terms such as "market based energy efficiency programs," performance incentives, and changes to carry over funds.

There were a number of additional concerns expressed at the November 19th EESE Committee meeting, and the PUC should have offered this Order as a forum for discussion instead of negating nine months of settlement negotiations, and issuing a fiat.

Although ramping down the use of the System Benefits Charge (SBC) to fund energy efficiency programs over the next few years *may* have short term rates benefits, without question, it will result in higher long term energy costs as NH becomes less and less energy efficient, and more dependent on out of state resources. Ratepayer funded energy efficiency is the way forward.

Thank you for undertaking the complex issue of energy efficiency, and thank you for your attention to these concerns.

Bruce Berk
The New Hampshire Network
Pittsfield, NH