



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

02/05/2021

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

Dear Ms. Howland:

As businesses and employers with significant operations in New Hampshire, we support policies that help to accelerate energy efficiency investments in the Granite State. Specifically, we support the utility proposed savings targets of 4.5% for electric and 2.8% for natural gas in the settlement agreement for the 2021-2023 Statewide Energy Efficiency Plan.

New Hampshire businesses are increasingly setting goals to cut emissions, invest in clean energy, and reduce energy use. We're doing so to benefit our communities' health and the environment, but also because it makes good business sense. Over 120 New Hampshire businesses have signed-on to a set of [clean energy principles](#)¹ developed by Ceres and New Hampshire Businesses for Social Responsibility. These principles call for strong state programs to increase the efficiency of energy consuming or producing resources, because energy efficiency is the most cost-effective energy resource available.

¹ NH Clean Energy Principles. <https://nhbsr.org/energy>

Investments in energy efficiency not only help businesses cut costs, they also support some of the state's highest paying jobs and will help drive the state's economic recovery. In 2019, more than 12,000 New Hampshire residents worked in clean energy, with nearly 90% employed by the energy efficiency sector.² These jobs are local, in hands-on fields like installation so they cannot be easily outsourced, and many have average salaries 50% higher than the state average.³

Energy efficiency investments through the NHSaves program can also lower net demand on the electrical grid resulting in avoided demand costs for all residents by reducing the need for expensive oil and gas peaker plants that are too expensive to be economical outside of periods of peak demand.*⁴ Additionally, efficiency investments also reduce the need for construction of new generation, transmission, and distribution capacity needed to meet growing electricity demand.⁵

The 2021-2023 NHSaves program's initially proposed savings targets held enormous financial potential with expected savings of \$1.3 billion during the three year program period. These savings targets were 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 2002.⁶ Because these cost savings are critical for the state's business community to make a sustained economic recovery, 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 savings targets in the Settlement Agreement for the 2021-2023 NHSaves program.

Thank you for your time and consideration.

Sincerely,

Ashuelot River Hydro, Inc.
Breathe New Hampshire
Estate Preservation & Planning
Filtrine Manufacturing
Garland Mill
Green Energy Options of Keene
Hannah Grimes Center
Hannover Co-op Food Stores & Auto Service Centers
Lonza

² E2 "Clean Jobs America 2020" <https://e2.org/wp-content/uploads/2020/04/E2-Clean-Jobs-America-2020.pdf>

³ <https://www.puc.nh.gov/20181101-RPS-Review-2018-FINAL-REPORT-2018-11-01.pdf>

⁴ ISO-NE "New England's Electricity Use" <https://www.iso-ne.com/about/key-stats/electricity-use>

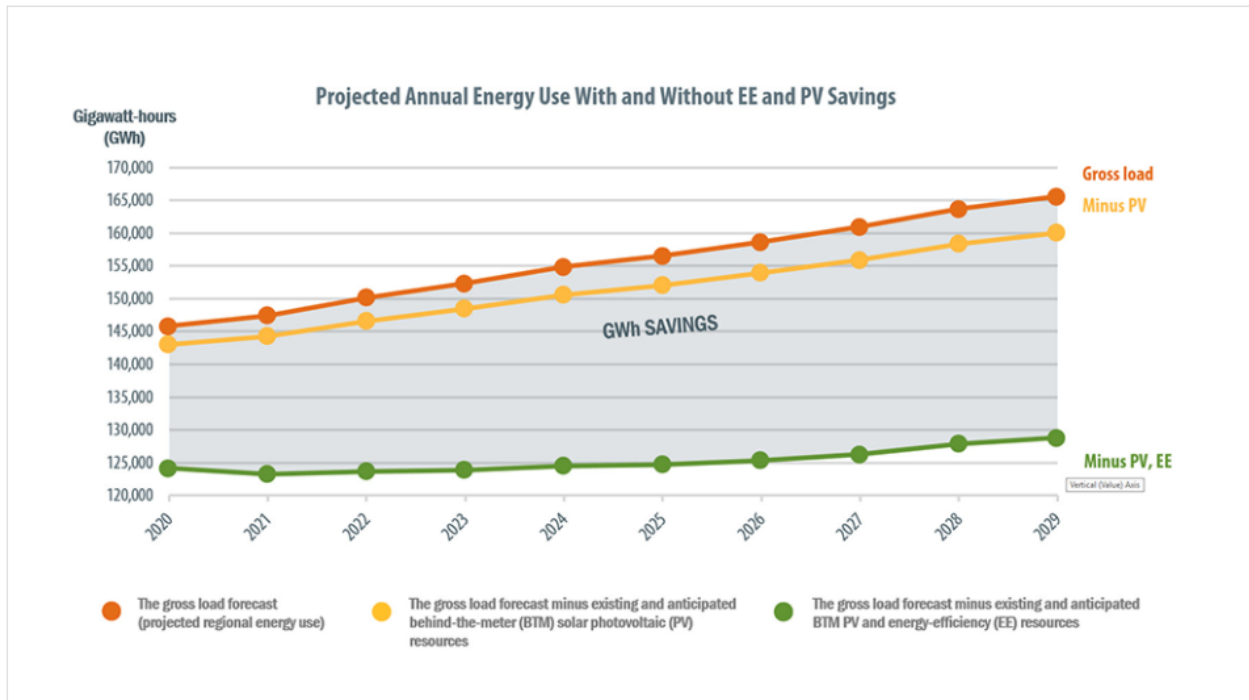
* See Graph in Appendix A illustrating New England's 's 10 year energy use with and without energy efficiency savings.

⁵ EPA "Assessing the Electricity System Benefits of Energy Efficiency and Renewable Energy" https://www.epa.gov/sites/production/files/2018-07/documents/mbg_2-3_electricitysystembenefits.pdf

⁶ NHSaves "2021- 2023 New Hampshire Statewide Energy Efficiency Plan," <https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-092>

Mainstay Technologies
MAYO Designs, Inc.
MegaFood
Mighty Roots, LLC
NEC Solar Services
Placework
ReVision Energy
Ridgeview Construction
Sarah Mae Brown Consulting
Sheldon Pennoyer Architects
Standard Power
Stonyfield Organic
Sullivan Construction, LLC
Sustainable Futures Consulting
Timberland
Tupelo Music Hall
Veris Wealth Partners
Worthen Industries.

Appendix A: New England's Projected 10 Year Energy Use



<https://www.iso-ne.com/about/key-stats/electricity-use>