



BUSINESS & INDUSTRY ASSOCIATION
New Hampshire's Statewide
Chamber of Commerce

December 14, 2021

Mr. Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 Fruit Street, Suite 10
Concord, NH 03301

RE: Docket No. DE 20-092 2021-2023 Energy Efficiency Plan; Motion for Rehearing, Clarification and Stay of Order No. 26,553

Dear Chairman Goldner,

I'm writing to express the Business and Industry Association's (BIA) support for the Commission to move for an immediate stay of Order No. 26,553 (the Order), that severely impairs New Hampshire's energy efficiency program.

BIA is New Hampshire's statewide chamber of commerce and leading business advocate. We also serve as the New Hampshire Manufacturing Association and are the official affiliate of the National Association of Manufacturers. We represent over 400 leading employers across the state in a variety of industries, including energy efficiency. Member firms employ 89,000 people in New Hampshire, which represents one in seven jobs and contribute \$4.5 billion annually to the state's economy. Many of our members are large energy consumers in manufacturing, healthcare, and financial services, and educational institutions. All members have properties or branches within New Hampshire and are located throughout the state and large campuses (with associated large energy bills).

BIA supports the motion for rehearing, clarification and stay, and urge the Commission to immediately stay the Order. A stay of the Order will provide certainty and stability for energy efficiency programs that businesses need by maintaining status quo system benefits charge (SBC) rates. Businesses utilize energy efficiency programs to help offset the upfront costs of undertaking measures and projects that help reduce the ongoing operating costs of the participating businesses. By having program certainty and continuity in place, businesses are not only able to reasonably rely on what offerings are and will remain available, they can also plan for more complex or larger projects that may take longer to implement and install, which also typically result in significant amounts of energy savings. New Hampshire businesses need certainty and consistency regarding energy efficiency funding and programs. Operating without certainty and funding of energy efficiency programs will needlessly and wastefully contribute to the increased use of energy in the State of New Hampshire, and businesses will lose money in the long run without the benefits of these programs.

While the BIA continues to oppose the doubling of the energy efficiency funding as proposed to the Commission in the Settlement Agreement in Docket No. DE 20-092, BIA strongly supports energy efficiency, and fully opposes the significant reduction of funding for energy efficiency programs. The BIA

PROMOTING A HEALTHY CLIMATE FOR JOB CREATION AND A STRONG NEW HAMPSHIRE ECONOMY

Letter of Support – Motion to Stay

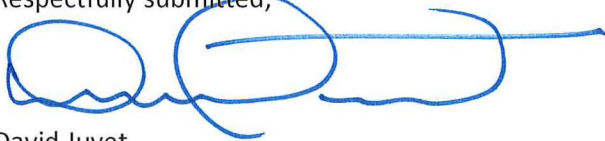
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maintains that a more modest approach to future SBC increases is required than that proposed by the 2021-2023 Settlement Agreement. Increasing costs substantially and rapidly for commercial and industry customers is bad for employers and the state's economy. Extending the 2020 SBC rates program structure is the best way to sustain energy efficiency while protecting New Hampshire businesses from immediate and significant electricity cost increases.

BIA asks the Commission to motion to stay the Order to ensure stability for energy efficiency funding and programs for New Hampshire's businesses at the prior 2020 SBC program rate structure, as doing so will help enable those businesses to thrive. Thank you for considering this request.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the right.

David Juvet
Senior Vice President of Public Policy/Interim President
Business & Industry Association of New Hampshire