

STATE OF NEW HAMPSHIRE

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June 3, 2020

New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301

Re: Docket No. DE 20-092
Electric and Natural Gas Utilities
Triennial Energy Efficiency Plan Proceeding
Motion for Rehearing

To the Commission:

The purpose of this letter is to communicate the support of the Office of the Consumer Advocate for the Motion for Rehearing and Clarification of Order No. 26,621 filed jointly on May 27, 2022 by the six utilities that administer the state's ratepayer-funded energy efficiency program.

In particular, the OCA shares the utilities concern about the Commission's interpretation of the newly enacted language in RSA 374-F:3, VI-a(d)(4) that requires each electric utility to plan for at least 65 percent of program-related energy savings to come via reductions in electricity use as opposed to other fuels. As the utilities note, requiring them to meet that 65 percent threshold on both an annual and a lifetime basis (as opposed to just an annual basis) will devastate programs offered to residential electric customers.

It is our respectful opinion that such an outcome would not only be unfair, unjust and contrary to longstanding principles of equity regarding the disbursement of benefits related to the energy efficiency programs among the various customer classes. It would also be, in our view, inconsistent with legislative intent for the reasons explained by the utilities in their motion.

We therefore urge the Commission to grant the utilities' motion for rehearing. Thank you for considering our views.

Sincerely,

A handwritten signature in blue ink, appearing to read "Donald M. Kreis".

Donald M. Kreis
Consumer Advocate

cc: Service List