

THE STATE OF NEW HAMPSHIRE
Before the
PUBLIC UTILITIES COMMISSION

IR 22-042

ELECTRIC AND NATURAL GAS UTILITIES

Investigation of Energy Efficiency Planning, Programming, and Evaluation

MOTION TO SCHEDULE A COMMISSIONER-ATTENDED TECHNICAL SESSION

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; New Hampshire Electric Cooperative, Inc.; Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc. (UES); Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty; and Northern Utilities, Inc. (Northern) (collectively the “NH Utilities”) respectfully request that the Commission schedule a technical session which the Commissioners, Commission Staff, the NH Utilities and any other stakeholders may attend, so that the NH Utilities may answer any questions the Commission may have in relation to the information requested in the procedural order dated August 19, 2022 issued in this docket (the “Order”), in lieu of providing the information in the method requested in the Order.

In support of this motion the NH Utilities state the following:

In the Order, the Commission requests “user guidance documents, manuals, or spreadsheets to help the Commission understand inputs and the flow of calculations across spreadsheet tabs pertaining to the Granite State Test and Total Resource Cost Test, as well as the Performance Incentive formula calculations pertaining to the Smart Start program” as well as “source information for hardcoded inputs, including linked Excel files.” However, with the exception of the table that details the Performance Incentive formula calculations pertaining to

the Smart Start program, which can be found on page 9 of 14 in the Eversource 2021 Annual PI Filing made on 6/1/2022, filed as Tab 293 in Docket No. DE 17-136, no such documents, manuals or spreadsheets exist, as they are not needed in the administration of the NHSaves programs.¹ While source information for hardcoded inputs in the August 1, 2022 reports, including linked excel files, does exist, compiling and providing it would create an undue administrative burden on the NH Utilities, and may not satisfy all of the Commission's questions regarding the cost-benefit tests, and may potentially raise additional questions that would require the NH Utilities to compile and submit additional documents, further adding to the administrative burden.

However, the NH Utilities acknowledge that a great deal of information was provided in the August 1, 2022 reports filed to this docket and it is understandable that the Commission has questions about those reports. But rather than the NH Utilities undertaking a burdensome effort to provide documents which may not fully address the Commission's questions, the NH Utilities propose that the Commission schedule a technical session for the Commissioners and Commission Staff to question the subject matter experts of the NH Utilities tasked to the NHSaves programs about the benefit-cost tests. The NH Utilities respectfully submit that a technical session would be an efficient way to provide the Commission with the information it seeks, and they also note that prior to the separation of Commission Staff to the New Hampshire Department of Energy, the NH Utilities had numerous successful meetings with Commission

¹ See generally the Benefit-cost test working group materials from the March 14, 2019 agenda on the PUC website, specifically the NH BC Summary Spreadsheet excel file, that can be found here: https://www.puc.nh.gov/EESE%20Board/EERS_Working_Groups.html#benefitcost. While this spreadsheet is not exactly what the Commission requests in the Order, it does provide a list of the inputs to the Benefit Cost model along with a definition of those inputs, and the source of information from which the inputs are derived. While this does not provide specific direction as to the workings of the live Excel model, it provides context to the specific attributes related to energy efficiency projects and measures that are tracked by the NH Utilities for the purposes of determining cost-effectiveness. It is important to note that this spreadsheet was based on the model used for program year 2019 and thus may not reflect the most current inputs to the cost-effectiveness test.

Staff for just this purpose—to provide a greater understanding of data inputs and applications that consequently creates greater insight into employment of the cost-benefit models.

The NH Utilities request that this technical session not be attended and recorded by a court reporter, as the NH Utilities would not be presenting witnesses, there is no testimony to speak to, and this is not an adjudicative proceeding. Rather, this technical session should advance the purposes investigations are intended for: informal exchanges among interested stakeholders to offer the Commission insight exclusively for information gathering purposes. The NH Utilities believe that a technical session attended by the Commissioners will allow for a greater opportunity for a productive exchange among stakeholders, the NH Utilities and the Commissioners, and allow for the NH Utilities to be more responsive to Commission questions than if the NH Utilities were only to create and provide the requested documentation. A Commission technical session will also avoid the administrative burden of generating new documents, the contents of which are not readily available for compilation into a single location and would take considerable effort to produce.

The NH Utilities hope that the Commission will avail itself of the opportunity to meet with the NH Utilities and any interested stakeholders through a technical session so that a robust discussion may be held with an aim to provide insight and clarity to any questions pertaining to the August 1, 2022 reports filed by the NH Utilities.

WHEREFORE, the NH UTILITIES respectfully request that the Commission:

- (1) Schedule a technical session as proposed in this motion; and
- (2) Order such further relief as may be just and equitable.

Respectfully submitted,

**Public Service Company of New Hampshire d/b/a
Eversource Energy; Liberty Utilities (Granite State
Electric) Corp. d/b/a Liberty; New Hampshire Electric
Cooperative, Inc.; Unitil Energy Systems, Inc.; Liberty
Utilities (EnergyNorth Natural Gas) Corp d/b/a Liberty;
and Northern Utilities, Inc.**


08/29/2022
Date

By: 
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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

08/29/2022
Date


Jessica A. Chiavara