From: Rep03281

Sent: Thursday, October 26, 2023 10:39 AM

To: PUC: <puc@puc.nh.gov>

Cc: Kreis, Donald <<u>donald.m.kreis@oca.nh.gov</u>> Subject: DE 23-068 Electric and Gas Utilities

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

Dear Commissioners:

For purposes of this three-year plan, I ask that you raise the discount rate used to determine the value of NH Saves expenditures. In the interests of full disclosure, I am a member of the Residential Ratepayers Advisory Board and was appointed to represent the interests of the elderly. This letter represents my position and not necessarily that of the Board.

The current discount rate is 2.78%. This is unrealistic by any standards, academic or otherwise, especially when 30-year U.S. Treasury bonds are yielding around 5%, utilities' cost of capital is even higher, and some utilities are charging their customers 1% per month for late bill payments (e.g., Eversource). It's quite clear that today's low discount rate was put in place to enable more energy-savings projects to be implemented even if, using a more reasonable discount rate, they make no financial or economic sense.

The unrealistically low rate is supported by those who believe almost any project that saves some energy at some time, now or in the future, is desirable -- to combat global warming, to reduce future electric generation needs, etc. It is also supported by those who stand to profit from selling and installing these projects.

I oppose it because it shifts an unnecessary cost burden from the future -- where the savings are -- to the present -- where the costs are. This is inherently unfair, especially to today's elderly ratepayers who will bear the cost in higher rates but not enjoy the benefit. Of course, any project, no matter how great its return on investment, shifts costs to the present. But using a more realistic discount rate would result in a smaller dollar burden shift on residential ratepayers. What justification can there be to shifting a larger-than-reasonable cost of uneconomic expenditures from one generation which might see a benefit to another which won't?

Respectfully,

Neal M. Kurk