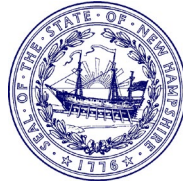


STATE OF NEW HAMPSHIRE

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DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

September 28, 2023

Daniel C. Goldner, Chairman
Public Utilities Commission
21 S. Fruit Street
Concord, NH 03301-2429

Re: DE 23-073 Low Income Electric Assistance Program, 2023-2024 Electric Assistance Program Budgets, **DOE Request for Expedited Order Approving EAP Budgets Effective October 1, 2023**

Dear Chairman Goldner,

For the reasons stated below, the New Hampshire Department of Energy (Department) requests an expedited order approving the Electric Assistance Program (EAP) budgets effective October 1, 2023. Without an immediate order, the Community Action Agencies and the utilities will be without administrative budgets at the start of the EAP program year.

By way of background, between July 31, 2023 and August 2, 2023, Unitil Energy Systems Inc.; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; the New Hampshire Electric Cooperative; Public Service Company of New Hampshire d/b/a Eversource Energy; (collectively the Electric Utilities) and the Community Action Agencies (CAAs) filed administrative budgets for the EAP 2023-2024 Program Year (PY) for the Commission's review and approval. The Office of the Consumer Advocate (OCA) file a letter of participation on August 15, 2023. On August 25, 2023, the Commission filed a *Commencement of Adjudicative Proceeding and Notice of Hearing*. The Commission requested that the Department file a statement of position regarding the EAP budget filings by September 15, 2023, and scheduled a hearing for September 21, 2023.

The Department filed a position statement on September 14, 2023; the OCA and the Electric Utilities filed position statements on September 15, 2023. On September 19, 2023, the EAP Advisory Board notified the Commission that the Advisory Board supported the Department's position that the administrative budgets represent expenses that would be reasonably incurred in the administration of the EAP during the 2023-2024 Program Year. A hearing was held on September 21, 2023; all parties were represented and the Commission had an opportunity to ask questions.

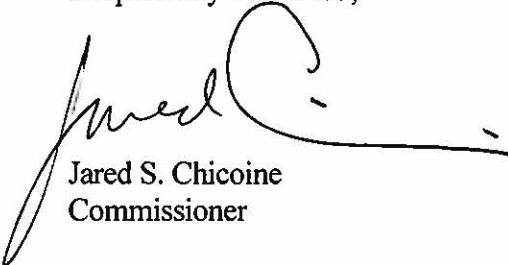
In summary, the total proposed 2023-2024 EAP administrative budget is 0.58% lower than the administrative budget for the 2022-2023 EAP PY. *See Department Position Statement* (September 14, 2023); *EAP Advisory Board Recommendation* (September 19, 2023). The utilities' incremental administrative costs may only include expenses that would be reasonably incurred as part of the utilities' administration of the EAP but would not be incurred absent the EAP. The CAAs'

administrative costs cover activities such as client outreach and intake, application processing, enrollment of participants and periodic review of ongoing program eligibility. The CAAs also conduct compliance monitoring to ensure program guidelines are being adhered to and undertake outreach and education about the EAP.

October 1, 2023 is the beginning of the EAP program year; however, the Commission has not yet approved the administrative budgets. Given last year's increase in electricity rates for the winter season, and the imminent start of the program year, the Department respectfully requests that the Commission issue an expedited order approving the budgets in full. In the opinion of the Department, such an order could be issued without further process and no further process would be necessary. *See* Dkt. No. 20-123, Order No. 26,405 (September 18, 2020) (approving EAP budgets without hearing Dkt. No. DE 17-122, Order No. 26,059 (September 22, 2017) (same). Absent an expedited order from the Commission this week, the EAP program will be without funding for administrative expenses.

Consistent with the Commission's current policy, this letter is being filed solely in electronic form. Thank you for your attention to this matter.

Respectfully submitted,



Jared S. Chicoine
Commissioner

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