

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

ELECTRIC AND GAS UTILITIES

2024 NHSaves Interim Program Update

Docket No. DE 24-XXX

**NH UTILITIES' JOINT PETITION FOR APPROVAL OF AN INTERIM UPDATE TO
THE 2024-2026 NHSAVES TRIENNIAL ENERGY EFFICIENCY PLAN**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.06 and RSA 374-F:3, VI-a(d)(5), New Hampshire Electric Cooperative, Inc.; Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”); Unitil Energy Systems, Inc.; Liberty Utilities (“EnergyNorth Natural Gas”) Corp. d/b/a Liberty; Liberty Utilities (“Granite State Electric”) Corp. d/b/a Liberty; and Northern Utilities, Inc. (collectively, the “NH Utilities”) hereby petition the New Hampshire Public Utilities Commission (“Commission”) to approve an interim program update (“Update”) to the 2024-2026 NHSaves Triennial Energy Efficiency Plan (the “Plan”), as described below in this petition and supporting attachments. In support of the Update, the NH Utilities state as follows:

1. RSA 374-F:3, VI-a(d)(5) states in relevant part:

Any utility or party may petition the commission to approve interim program updates prior to the next 3-year planning period on July 1 of any year during which a 3-year plan is not filed. The commission shall issue its order approving or denying the interim program updates by the following November 30. If the commission fails to issue an order on . . . an interim program update during the year in which a petition is filed, the proposed alterations to programs and budgets shall be deemed approved except for changes in performance incentives and recovery of lost base revenues, which the commission shall promptly review and approve by order. If the commission denies a 3-year plan or interim program update, the most recent 3-year plan, as updated, shall remain in effect until the commission approves proposed changes to that plan or program update filing.

2. The Plan, which took effect by operation of law on January 1, 2024, as detailed in Order No. 26,908, states in Section 2.1.6: “[t]he NH Utilities will file an interim program update to apply the updated benefits from the 2024 AESC study to program years 2025 and 2026. Upon Commission approval of the interim program update, the portfolio planned benefits and net benefits against which utility performance is measured will be adjusted to reflect the updated AESC values.”

3. Consistent with the authorities provided above, the NH Utilities herewith present the Commission with the impacts of the recently completed 2024 Avoided Energy Supply Components (“AESC”) study on program years 2025 and 2026 and seek Commission approval to update the Plan and Benefit/Cost (“BC”) Models (from the currently used 2021 AESC study benefits) with the 2024 AESC study benefits. This Update does not contain a change to program offerings or Plan structure; it is simply an update to the input and output values resulting from the application of the more recent 2024 AESC compared to the 2021 AESC used for the initial Plan proposal.

4. As discussed in Section 6.4.3 of the Plan, the AESC benefits are the result of a robust and comprehensive study overseen by a diverse group of stakeholders representing a variety of interests, and represent state-specific values for avoided energy, capacity and certain transmission costs resulting from effective energy efficiency programming. As discussed in the Plan, “[t]he outputs of the AESC, when applied, will result in changes to the marginal avoided costs (i.e., benefits) of avoided electricity, natural gas, and other resources as reflected in the NH Utilities’ BC models.” As demonstrated by the attachments accompanying this petition, the 2024 AESC results had a negligible impact on the planned program benefits for the electric utilities. The impacts on the gas utilities were more pronounced, due to the lower long-term price projections of

natural gas in AESC 2024 compared to AESC 2021. Nevertheless, all gas and electric NHSaves programs remain cost effective using the 2024 AESC.¹ Please see Attachment A for a summary table of the cost effectiveness of all NHSaves programs by utility, both before and after the application of the 2024 AESC, Attachment B for the updated Plan attachments affected by the application of the 2024 AESC results for each of the NH Utilities, and Attachment C for a copy of the 2024 AESC (which also can be found at <https://www.synapse-energy.com/aesc-2024-materials>).

5. This Update also includes two discrete Eversource budgetary requests—a funds transfer and the identification of a moderate income-qualified incentive—all using Eversource’s carryover funds from program year 2023 and working within the existing Plan and program framework. As such, the two requests are complementary to existing program offerings and will have *no budgetary impact* on the existing programs, as discussed in more detail in the paragraphs that follow and the accompanying attachments.

6. The budgetary request is for Eversource to transfer \$1,500,000 of its 2023 carryover to its on-bill-financing (“OBF”) offering. Eversource’s OBF fund balance has been depleted for a couple of key reasons. Customer demand for OBF has been consistently high, yet Eversource has not provided incremental funding to the OBF funding pool for several years. The net result is that available funding in the OBF funding pool has declined to \$10,304 (\$329,210 balance less \$318,906 potential loans on current projects) as of the 2024 Q1 Report, filed on May 30, 2024, in Docket No. DE 23-068. To maintain a sustainable OBF funding pool that can meet the growing demands from customers seeking to cover their share of the cost of NHSaves supported energy

¹ Except for NHEC’s Municipal Program, which has a cost benefit ratio of .66 using the 2021 AESC and .63 utilizing the updated 2024 AESC avoided costs. However, the program was included in the currently effective Plan with a ratio of less than one, so the decrease in that ratio from .66 to .63 is not a material one.

efficiency projects, Eversource seeks to use a portion of its 2023 carryover, reported in its 2023 performance incentive calculation filed on May 31, 2024, in Docket No. IR 22-042, to re-capitalize its OBF pool. This funds transfer will not require a change to the budgets of any program within Eversource's suite of energy efficiency programs.

7. Eversource's second request is that the Commission approve the continuation of the moderate-income weatherization program services provided by RGGI Grant #18-005, which is set to terminate on December 31, 2024, through expansion of the existing Home Energy Performance program to include a dedicated, income-qualified incentive pathway for moderate-income customers. Eversource can fully fund and operate this effort using its 2023 carryover funds and without exceeding 105 percent of the approved sector budget. Consequently, there would be no impact to the budgets of any other Eversource programs. For a detailed description of the moderate-income incentive and the justification for dedicating this funding to this subset of customers, please see Attachment D. Offering incentive dollars aimed explicitly at moderate-income qualified customers within the existing Home Energy Performance program will allow Eversource to continue providing weatherization and other services to a vulnerable and sometimes overlooked subset of customers who tend to spend a disproportionate percentage of their income on energy and do not otherwise qualify for energy assistance.

8. The requests contained within this Update are consistent with RSA 374-F:3, VI-a(d)(5) and the Plan and are overall just and reasonable and in the public interest. The New Hampshire Supreme Court has found that when the plain language of a statute contains no requirement for a hearing for the Commission to reach a determination, then "unless opportunity for a hearing is required by due process, the proceeding at issue is not a 'contested case'" within the meaning of RSA 541-A:31. *Appeal of Off. of Consumer Advoc.*, 148 N.H. 134, 137 (2002). Since it is not

anticipated that this Update would raise any contested issues to which a party would object, or on which parties would require or seek further process, and because RSA 374-F:3, VI-a(d)(5) has no language requiring a hearing, the NH Utilities respectfully request that the Commission approve this Update via order *nisi*, as a hearing is not necessary. However, should the Commission decline to approve this Update, the NH Utilities will continue to apply the 2021 AESC results and all other provisions of the currently effective Plan without any material alteration.


WHEREFORE, the NH Utilities respectfully request that the Commission:

- A. Grant the use of the 2024 AESC results for the remainder of the 2024-2026 Plan term;
- B. Authorize the transfer \$1,500,000 of Eversource's 2023 carryover to its OBF;
- C. Continue weatherization services for Eversource's moderate-income customers with a dedicated incentive contained within Eversource's home energy performance program; and
- D. Grant any such further relief as may be just and reasonable.

Respectfully submitted,

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

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY

By: 

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Date: July 1, 2024

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