

STATE OF NEW HAMPSHIRE

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December 16, 2022

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

Re: Docket No. IR 22-042
Investigation into Energy Efficiency Planning, Programming, and Evaluation

To the Commission:

Enclosed for filing in the above-referenced investigative proceeding are responses to Commission questions as prepared by Tim Woolf and Courtney Lane of Synapse Energy Economics (“Synapse”). Mr. Woolf, Ms. Lane, and their colleagues at Synapse are nationally recognized experts on the subject of ratepayer-funded energy efficiency programs, particularly on matters related to cost effectiveness tests. Mr. Woolf, Ms. Lane, and their colleague Melissa Whited are the lead authors of the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources (commonly referred to as the NSPM) which, in turn, is the basis for the development of the Commission-approved and statutorily mandated primary cost-effectiveness test used for energy efficiency programs in New Hampshire (the Granite State Test), which was developed by the Commission’s Benefit-Cost Working Group with the active assistance of Synapse. It is precisely because of this unique expertise that Synapse is under contract to the Office of the Consumer Advocate to provide us, and thereby the Commission and other interested parties, with advice on the future of ratepayer-funded energy efficiency in New Hampshire.

The Office of the Consumer Advocate adopts the insights and recommendations in the attached memorandum as reflective of the views of our agency. We would be pleased to make Mr. Woolf and Ms. Lane available to the Commission for discussion of their views and recommendations as appropriate.

The above notwithstanding, the OCA remains concerned about the nature, the scope, and the arc of this proceeding. We are keenly aware that the state’s electric and natural gas utilities, as program administrators of the NHSaves energy efficiency programs, are diligently working (and collaborating with stakeholders) to meet the statutory deadline of July 1, 2023 for the submission of a proposed triennial energy efficiency plan for 2024-2026. We strongly urge the Commission to avoid diverting program administrator resources from plan development efforts and also to avoid taking steps in this proceeding that could be understood as pre-judging issues that must be

resolved by adjudication once the new triennial plan is on file and/or that could be understood as inconsistent with legislative directives contained in RSA 374-F:3, VI-a(d).

We hope the attached responses are helpful to the Commission and we thank you for considering them.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DKreis', written in a cursive style.

Donald M. Kreis
Consumer Advocate

Encl.

cc: Service List