

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 23-068

ELECTRIC AND GAS UTILITIES

2024 – 2026 Triennial Energy Efficiency Plan

Procedural Order Re: Third Set Record Requests and Requests for Specific Answers

The Commission requests that 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 (“Eversource”); Unitil Energy Systems, Inc. (“Unitil”); Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty; and Northern Utilities, Inc. (together, the “joint utilities”) respond to the following record requests and requests for specific answers. These requests are designed to aid the Commission’s expedited review of the 2024–2026 Triennial Energy Efficiency Plan (“Plan”). We issue these requests in the spirit of clarifying many aspects of the Plan prior to hearing, understanding the supporting data in this proceeding, and to meet the Commission’s statutory responsibility pursuant to RSA 374-F:3, VI-a(d)(5) to issue an order no later than November 30, 2023. All responses to the third set of inquiries are requested by the close of business on October 11, 2023.

The joint utilities should identify the source of the data and provide backup workpapers and live Excel spreadsheets, as applicable.

Subset 1 – Inquiries Related to Benefit-Cost (“B/C”) Testing

Request 3-001-01

The joint utilities are requested to fill in the following tables, for electric and gas, respectively, to provide a 2024 snapshot of the incentive dollars per measure and unit cost per measure. Incentive per unit of measure should be calculated from the Calculations Yr Tabs (column J divided by the quantity in column G) in the B/C models. Unit cost per measure, in the second table, is defined as the actual cost of performing one unit of each measure without any incentive.

Incentive Per Measure (\$/Unit of Measure) in 2024						
Measure	Measure ID	Company 1	Company 2	Company 3	Company 4	Difference between Lowest and Highest

Unit Cost per measure (\$/Unit of Measure) in 2024						
Measure	Measure ID	Company 1	Company 2	Company 3	Company 4	Difference between Lowest and Highest

Request 3-001-02

Reference the ADR B/C models, specifically the Load Curtailment Targeted Dispatch for the Residential versus C&I sectors.

1. The Commission requests the following information to be filed for each Company through a joint response:

ADR Input - Company Name				
Measure	Class	Incentive (\$)	Quantity	Unit Cost (\$)
Direct Load Control Targeted Dispatch Upfront/Annual Incentive Summer	Residential			
Load Curtailment Targeted Dispatch P4P Summer	C&I			

2. Please explain any variations in the per-unit incentive for the same measure across utilities.

Request 3-001-03

Please provide in live MS Excel format a consolidated table across Electric and Gas utilities that breaks down the following information (in dollars) for 2022:

Company Name	Total Electric Benefits in 2022 (\$)	Total Non-Electric Benefits in 2022		Total Benefits for Granite State Test (\$)
		Resource (\$)	Non-Resource (\$)	

* Insert rows for each Company

Request 3-001-04

On Bates page 97 of the Plan, the joint utilities state that the “EM&V measures ‘impact factors’, including the percentage of energy saving actually realized (i.e., realization rates), based on independent third-party analysis of completed projects.” The Commission notes that the B/C models use a range of realization rates, including 114% non-electric realization rates for Home Performance and 35% for Energy Star Homes New Construction Code Compliance, whereas the net-to-gross factor applied is 100% in most cases, but as low as 23% for LED bulbs (ES Appliances).

1. Please explain how these factors for each measure have been assigned, accompanied by references and supporting evidence, as available.
2. Please explain how these factors are mathematically captured in the model to ascertain impacts on the final costs.

Request 3-001-05

Provide historical data for all utilities that shows sub-program-level expenditures (in dollars) from 2017 to 2022.

			Actual Expenditure (\$)					
Program	Sub-Program	Company Name	2017	2018	2019	2020	2021	2022

Request 3-001-06

Please provide support for the \$675 million estimate outlined in Record Request Response 1-001-2 by helping the Commission identify the relevant information from a representative B/C Model. The response should offer guidance and references to the appropriate Excel tabs and/or cells.

Request 3-001-07

Refer to the B/C models LookUps tab: With respect to the application of real discount rate:

1. Please state whether the real discount rate for costs is simply applied to the total costs directly in the Primary Data tab to bring those costs to 2024 dollars.
2. Please confirm that the discount rate for benefits is applied in a different tab than the Primary Data Tab.
3. If the responses to parts 1 and 2 are in the affirmative, please explain why the approaches to apply discount rates were modeled differently for benefits and costs.
4. Please confirm whether all discounted benefits that eventually flow into the Primary Data tab are in 2024 dollars.

Request 3-001-08

In live MS Excel format:

1. Provide a yearly breakdown, for 2024 to 2026, of the projected number of participating customers in the Plan by rate class.

Planned Number of Participating Customers by Rate Class			
Rate Class	2024	2025	2026

* Insert rows as needed.

2. Provide the actual number of participating customers by rate class in 2020, 2021, and 2022.

Actual Number of Participating Customers by Rate Class			
Rate Class	2024	2025	2026

* Insert rows as needed.

Request 3-001-09

1. In MS Excel, provide historical B/C ratios at the overall portfolio-level and sector level from 2018 to 2023.

B/C Ratios						
Sector-Level	2018	2019	2020	2021	2022	2023
Income Eligible						
Residential						
C&I						
Portfolio-Level						

2. In the same Excel sheet, provide projected B/C ratios at the overall portfolio-level and sector level from 2024 to 2026.

B/C Ratios			
Sector-Level	2024	2025	2026
Income Eligible			
Residential			
C&I			
Portfolio-Level			

Request 3-001-10

For each of the utilities, please provide page 304 of FERC Form 1 for the most recent year in MS Excel format. If the NHEC does not file this information, readily available comparable data is requested.

Request 3-001-11

Please provide for all utilities combined, a summary of electric benefits by end use category for the 2024-2026 Plan:

End Use	Percentage of Total Electric Benefits	Percentage of GST Benefits	Percentage of TRCT Benefits
(e.g., Envelope)			
(e.g., HVAC)			
(e.g., Lighting)			
(e.g., non-energy savings)			
Total	100%	100%	100%

Subset 2 – Funding and Program Details

Request 3-002-01

Refer to Bates Page 73 of the Plan.

1. For 2022, please provide the requested information that relates to the interplay of the Electric Assistance Program and Income-Eligible Home Energy Assistance Program:

EAP Tiers	EAP		EE		Number of Customers on both EAP and EE
	Number of Participants	Total Incentive (\$)	Number of Participants	Total Incentive (\$)	
1					
2					
3					
4					
5					
6					
7					
8					
TOTAL					

2. If the goal of the energy efficiency program is to incentivize energy savings, have utilities monitored whether the EAP discounts impact the effectiveness of EE programming? If so, how, and if not, why not?

Request 3-002-02

Please provide a breakdown of the Program Costs in live MS Excel format with supporting schedules (e.g., Company’s quarterly reports) in the following format:

	Historical (Quarterly) Total Program Costs (\$)											
	2020				2021				2022			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
HEA												
Non-HEA												
Non-HEA customer Cost												
Total Residential												
C&I												
C&I customer cost												
Grand Total of Program Costs												

Request 3-002-03

Please provide historical spending information, beginning in 2020, on the incentives provided each quarter in the following format:

	Historical (Quarterly) Spending on Incentives (\$)											
	2020				2021				2022			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
HEA												
Non-HEA												
Total Residential												
C&I												
Grand Total of spending												

Request 3-002-04

1. Please discuss how weatherization and other economic benefits are accounted for in calculating the HEA benefits.
2. What is the total non-resource benefit that (in dollars) added per project for HEA in the Plan?
3. What is the expected breakdown of HEA funding by: (i) property owners who are low-income; (ii) low-income renters; and, (iii) low-income rental property owners.

Request 3-002-05

How will the Home Energy Reports program tie in with the activities associated with the Active Demand Response measures?

Request 3-002-06

Reference Bates page 64 of the Plan. With respect to the Energy Star Retail Products Program (ESRPP):

1. How are retailers selected for the ESRPP program? Please provide details on the selection criteria and/or guidelines.
2. Please describe how the performance metrics of the ESRPP program are expected to be tracked.

Request 3-002-07

Refer to Bates page 41, Section 3.2.1, of the Plan. The Commission notes that the joint utilities are conducting a “Beyond Lighting” evaluation.

1. What percentage of costs and benefits were attributed to lighting in the previous Triennial Plan?
2. What percentage of costs and benefits are attributed to lighting (in \$ and % of total program costs and benefits) in the proposed plan, for each program under both C&I and residential sectors?

Request 3-002-08

Please complete the table with actual data. Provide a split by electric and gas customers of revenues collected through the SBC and LDAC charges, respectively. The response should also provide the annual kWh savings and number of participants for each (e.g., in Table 4-4 format from Plan).

	2017	2018	2019	2020	2021	2022
ELECTRIC						
SBC						
Annual kWh Savings						
Number of Participants						
GAS						
LDAC						
Annual MMBtu Savings						
Number of Participants						

Request 3-002-09

Refer to Bates page 44-45 (Section 3.3.1) of the Plan.

1. Do the customers of governments with municipal utilities pay SBC?
 - a. If yes, does the proposed budget under the EE program reflect those funds?
 - b. If not, please explain the rationale for the eligibility of local governments with municipal utilities to participate in the Municipal Program.
2. How are the “technical assistance” costs accounted for (e.g., incentives, internal, external, administrative costs, etc.) within EE programming?

Subset 3 – Further Questions on the 2024–2026 Plan

Request 3-003-01

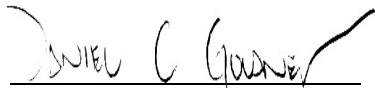
Please provide the critical path for each of the phases of the two-phase studies outlined in Attachment P on Bates Page 657 of the Attachments associated with the 2024–2026 Plan.

Request 3-003-02

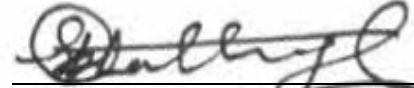
Please complete the table below for residential (non-HEA) programs and a separate table for C&I programs:

<u>Subsidy Level</u> <u>(%)</u>	<u>Number of</u> <u>Projects</u>	<u>Total Cost</u> <u>(\$)</u>	<u>Total Incentives</u> <u>(\$)</u>
0-19%			
20-39%			
40-59%			
60-79%			
80-99%			
100%			
Grand Total			

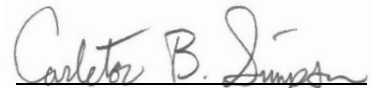
So ordered, this twenty-second day of September, 2023.



Daniel C. Goldner
Chairman



Pradip K. Chattopadhyay
Commissioner



Carleton B. Simpson
Commissioner

Service List - Docket Related

Docket#: 23-068

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