

**EAP Advisory Board
Minutes of March 30, 2018 Meeting**

Participants: Nicole Harris (Liberty), Shannon Nolin (BMCAA), Celeste Lovett (OSI), Tracy Desmarais (OSI), Lisa Sheehy (NHEC), Janice Johnson (Eversource), Sue Corson (Unitil), Steven Tower (NHLA), Raymond Burke (NHLA), Dianne Pitts (TWH), Gary Cronin (NHPUC), Rorie Patterson (NHPUC), Amanda Noonan (NHPUC), D. Maurice Kreis (OCA), Pradip Chattopadhyay (OCA), Karen Emis-Williams (Concord Human Services)

Discussion:

1. Revised Procedures Manuals –

On March 27, 2018, Ms. Noonan circulated by email four revised procedures manuals: for the community action agencies (CAA), the utilities, fiscal management, and monitoring and evaluation.

Several sections of the community action agency (CAA) manual were revised, including section 1.1, which defines customer eligibility requirements. The Board decided to add to Subsection 1.1.b., between the words “record” and “with”, the words, “or a member of the customer of record’s household”. That revision aligns the manual with the utilities’ practice of applying the EAP discount to an account, even if the benefits are in the name of a household member and not the customer. The utilities responded to Ms. Pitts’ question about the process for handling changes in a customer’s household.

The Board discussed adding electric vehicle charging stations to the list of exclusions in the utility procedures manual, in section 3.2.1.1., and adding a catch-all exception for other non-residential uses (*e.g.*, a dwelling that is used as the customer’s residence but primarily as the customer’s business). Mr. Tower expressed concern about “unintended consequences” resulting from the catch-all exception. The Board unanimously approved the revised procedures manuals as circulated (with the exception of the change noted to section 1.1.b. above), but tabled further discussion about adding electric vehicle charging stations to the utility manual to the April 27, 2018 meeting.

2. Board Recommendation – Application of EAP Discount to competitive energy costs

In the March 27th email referenced above, Ms. Noonan also circulated a final draft recommendation regarding changes to EAP eligibility, to allow the application of the discount to competitive energy supply costs. The Board voted unanimously to approve the draft recommendation with the following clarifications or changes.

Mr. Tower identified a missing period at the end of the last sentence of the recommendation, on page 6.

The Board discussed the language in the footnote on page 2 of the recommendation: “The utilities expect to implement the EAP design change approximately 6 months from the issuance of a Commission order with a target implementation date of October 1, 2018.” Mr. Tower observed a probable conflict between an October 1, 2018, implementation date and a date that is 6 months after a Commission order yet to be issued. The utilities clarified their expectations for implementation of the recommended changes: NHEC and UES expect implementation by October 1, 2018, and Liberty and Eversource expect implementation by October 1, 2018, with a contingency date of December 1, 2018.

Ms. Sheehy conveyed concern expressed to her by Brenda Inman (NHEC) about requiring customers to use consolidated billing in order to have the EAP discount applied to the competitive energy supply portion of the bill. Ms. Noonan briefly mentioned some of the difficulties the Board had discussed previously, involving the application of the EAP discount to competitive supply without consolidated billing. For example, the utility could end up owing the customer money, if the discount is only applied to delivery charges. Ms. Sheehy stated NHEC would support the recommendation as drafted, but did want to raise the concern.

Mr. Kreis expressed support for the draft recommendation, without further change. Mr. Kreis suggested that recent developments in Massachusetts, specifically the recommendation of the Massachusetts Attorney General to outlaw competitive supply for residential customers, could prompt similar policy in New Hampshire, which would require further revision to the EAP design. Mr. Tower joined in the concern about negative impacts of a competitive energy supply market on residential customers, but he expressed support for the draft recommendation without further change.

Ms. Noonan will revise the draft recommendation consistent with the one change discussed, and she will file it, with an electronic copy sent to the members of the Board. Ms. Noonan will clarify the time-sensitive nature of the filing, because the utilities would like the Commission’s approval of the changes before embarking much further on the software programming that will be necessary to effect the changes.