

From: McQueeney, Michael [mailto:MMcQueeney@trcsolutions.com]
Sent: Thursday, October 17, 2013 3:55 PM
To: PUC - Executive.Director
Cc: Bateman, Diane
Subject: Public Forum on Core Efficiency Programs

Hi Debra Howland,

Attached please find my comments requested from last Monday's (10/7) Public Forum on Core Efficiency Programs. Please include these comments in the forum. Thank you for the opportunity to provide these comments.

Best Regards, Mike

Mike McQueeney
Project Manager

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To: Debra Howland, Executive Director, New Hampshire Public Utilities Commission

From: Mike McQueeney, Project Manager, TRC Energy Services

RE: Public Forum on Core Efficiency Programs

RSA 374-F:3, X states that “[r]estructuring should be designed to reduce market barriers to investments in energy efficiency and provide incentives for appropriate demand-side management and not reduce cost-effective customer conservation. Utility sponsored energy efficiency programs should target cost-effective opportunities that may otherwise be lost due to market barriers.”

When the statute describes “Utilities should target cost effective opportunities that would otherwise be lost due to market barriers.” There is one particular customer class known as Small Apartment Buildings that suffer from not fitting into either the residential customer class for incentives because they have too many units or the commercial customer class because the energy usage is too low to qualify for incentives. We know that there are cost effective opportunities for energy efficiency in Small Apartment Buildings from the results of program’s such as New Hampshire Housing Finance Authorities Greener Homes Program.

Residential customers are normally defined as five units or less in one building. Small Apartment Buildings get lumped into the classification as a commercial customer by having more than five units or a common meter. Not qualifying for incentive means that these customers pay into the System Benefits Charge with limited access to CORE Utility incentive program benefits. These buildings are typically heated by a central boiler, have all of the same building attributes of residential construction and are home to working residents who can’t afford to buy homes. The high cost of implementing energy efficiency without incentives results in building owner’s charging higher rents to make operating these buildings a sustainable business proposition. This is particularly true for those customers who are beyond natural gas distribution who rely on oil or propane for heating.

Given that there is a specific statutory reference for residence that includes multifamily (please see below), can the CORE filings recognize Small Apartment Buildings of 30 or less apartments per building as qualifying for residential incentives?

Thank you for the opportunity to comment.

Sincerely,

Mike McQueeney

From <http://nhrsa.org/law/359-g-2-definitions/>

New Hampshire Revised Statutes Annotated (RSA) Index

359-G:2 Definitions

V. "Residence" means a single-family house, duplex, or multifamily unit designed for residential use in which title to each individual unit is transferred to the owner under a condominium or cooperative system and shall include common areas and improvements that are owned or maintained by an association or by members of an association. A residence includes the systems, other components, improvements, other structures, or recreational facilities that are appurtenant to the house, duplex, or multifamily unit at the time of its initial sale, but not necessarily a part of the house, duplex, or multifamily unit.