

State of New Hampshire
Public Utilities Commission

DE 08-120

2009 Statewide CORE
Energy Efficiency Programs

**Response Of The Way Home To
PSNH's Legal Analysis**

I. Background.

PSNH and Unitil have proposed a one year pilot program to include a “fuel blind” component to the Home Energy Solutions Program (HES) as part of the 2009 CORE Statewide Energy Efficiency Programs. At the hearing on December 11, 2008 PSNH submitted a legal memorandum entitled Legal Analysis Of The Use Of System Benefits Charge Revenue For A Fuel Blind Pilot Program In Home Energy Solutions.

The Way Home, in its closing statement at the hearing, supported the joint proposal for the HES pilot program. The Way Home submits the following Response to PSNH's Legal Analysis.

II. Discussion.

While The Way Home takes no position on the factual representations in PSNH's Legal Analysis, The Way Home concurs in the legal arguments set forth in the Legal Analysis.

Use of system benefits charge funds for a “fuel blind” pilot program would promote the restructuring goals of statewide energy savings and targeting cost effective opportunities that may otherwise be lost due to market barriers. RSA 374-F:3, X. A

“fuel blind” program would also promote the restructuring goals of benefiting all consumers, RSA 374-F:3, VI, as well as environmental improvement. RSA 374-F:3, VIII.

“Fuel blind” energy efficiency is not a new concept for New Hampshire. This Commission has already approved a CORE cost-effectiveness test which includes quantifiable benefits and costs associated with other resources in addition to electricity (e.g., water, gas, oil). Order No. 23,574, dated November 1, 2000, in DR 96-150. See Report to the N.H. Public Utilities Commission On Ratepayer-Funded Energy Efficiency Issues in New Hampshire, DR 96-150, From the New Hampshire Energy Efficiency Working Group, July 6, 1999, pages 15, 16.

Conclusion.

The record in this proceeding demonstrates the need for energy efficiency weatherization measures and services for residential customers. The proposed pilot program will promote the statutory goals to help address those needs.

Respectfully submitted,

The Way Home

By Its Attorney
New Hampshire Legal Assistance



Alan Linder
Dan Feltes
117 North State Street
Concord, NH 03301
Phone No. (603) 223-9750
Email: alinder@nhla.org
Email: dfeltes@nhla.org

Dated: December 16, 2008

Certification of Service

I certify that this Response Of The Way Home was filed with the Commission and was served electronically upon the Commission and all parties on the service list in this proceeding.

New Hampshire Legal Assistance



Alan Linder

Attorney for The Way Home

Dated: December 16, 2008