



Community Action Program Belknap-Merrimack Counties, Inc.



P.O. Box 1016 ♦ 2 Industrial Park Drive ♦ Concord, NH 03302-1016
Phone (603) 225-3295 ♦ Toll Free (800) 856-5525 ♦ Fax (603) 228-1898 ♦ Web www.bm-cap.org

Debra A. Howland, Executive Director
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

ORIGINAL	
N.H.P.U.C. Case No. <u>DE 10-188</u>	August 29, 2012
Exhibit No. <u>#68</u>	
Witness <u>Peng 16</u>	
DO NOT REMOVE FROM FILE	



RE: Docket No. DE 10-188 CORE Energy Efficiency Programs

Dear Ms. Howland:

The New Hampshire Community Action Association (NHCAA), requests the NH Public Utilities Commission consider transferring funds from the Regional Greenhouse Gas Emissions Reduction Fund (RGGI) to our existing Weatherization Assistance Program (WAP) to benefit low-income households. We request up to \$1,191,000 to weatherize up to 180 homes between 1/1/13 and 12/31/13.

In your letter dated August 16, 2012 you stated "the Commission will consider proposals to use any of the RGGI proceeds received before January 1, 2013 at the August 30th hearing". The following is a proposal from NHCAA to fund a highly successful program that serves low income and vulnerable clients in New Hampshire.

Community Action Agencies (CAA) have been contracted to deliver the Weatherization Assistance Program (WAP) since the late 70s. In April of 2009 WAP received a three (3) year infusion of approximately \$23,000,000 through the Office of Energy and Planning (OEP). Prior to the American Recovery and Reinvestment Act (ARRA) the average funding in the prior five (5) years was approximately \$1.1M to \$1.3M per year. An early build-up in training energy auditors, in-house employee crews and trained independent contractor workforce was mainly due to the "Stay Warm NH" Program which was funded by RGGI funds with no administrative fees. At one point during the 3 year production, New Hampshire was #11 in the country in production numbers.

In December of 2011 both Community Action Program of Belknap-Merrimack Counties, Inc. (CAPBMCI) and Southern New Hampshire Services had exhausted their ARRA funds and began a rapid reduction in work forces both in-house and contractors. This has been the case with the other three (3) CAAs as all ARRA funds will have be expended by September 30, 2012. After a very successful "ramp up" to the three (3) year ARRA investment we now have to release highly trained energy auditors, in-house crew members and numerous contractors that were also trained with ARRA investment.

ALFON	CONCORD	FRANKLIN	LACONIA	OSISPEE	PLYMOUTH
Elderly875-7102	Center 225-6880	Center 934-3444	Center 524-5512	Family Planning539-7552	Family Planning 536-3584
Prospect View Housing.....875-3111	Head Start/EHS..... 224-6492	Head Start 934-2161	Head Start 528-5334	Prenatal.....539-7552	STD/HIV Clinics 536-3584
BELMONT	Elderly 225-3092	Elderly 934-4151	Early Head Start..... 528-5334	STD/HIV Clinics.....539-7552	
Elderly267-9867	Concord Area Transit 225-1989	Family Planning..... 934-4905	Elderly..... 524-7689		
Heritage Terr. Housing.....267-8801	Horseshoe Pond Place..... 228-6956	STD/HIV Clinics 934-4905	Family Planning..... 524-5453		
BRADFORD	WICISFP..... 225-2050	Riverside Housing..... 934-5340	Prenatal 524-5453		
Elderly.....938-2104			STD/HIV Clinics 524-5453		
	EPSOM	KEARSARGE VALLEY	MEREDITH	PITTSFIELD	SUNCOOK
	Meadow Brook Housing ... 736-8250	Center 456-2207	Center 279-4096	Elderly435-0482	Center 485-7824
		Head Start 456-2208	Elderly..... 279-5631	Head Start435-6618	Elderly 485-4254
		Kearsarge Housing 456-3398			

The current 2012 funding level through OEP is \$590,000 and correlates to only 91 homes to be weatherized in the state for 2012. This is well below the previous three (3) year production of more than 3200 households. Historically these funds have been made available on April 1st of each year. The current 2012 funding is presently on hold and not expected to be released until October, 2012. The funding from the Department of Energy (DOE) has always been the backbone and financial support of the CAA Weatherization Assistance Program. With the current funding level and unpredictable congressional budgets in Washington the WAP lacks stability and an uncertain future, especially with so many households needed to be done.

The DOE funds have always been leveraged with the Home Energy Assistance (HEA) through the CORE Program and historically this rate has been between 98% and 100%. It is this HEA Program that has aided in supporting the sustaining of the CAA weatherization infrastructure and serving the needs of the low income and vulnerable clients. It is the request of the CAAs to fund the "weatherization" portion of our energy programs as follows.

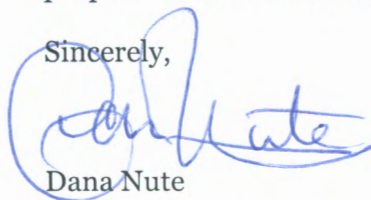
CAPBMCI proposes that \$1,191,000 be funded for the CAA Statewide Weatherization Program. The Program will be managed by CAPBMCI as agreed upon by the NHCAA. The Program will meet all DOE standards and requirements. All Weatherization Services for low income clients will be performed in accordance with regulations set forth by the DOE in 10 CFR 440 dated February 1, 2002 and 10 CFR 600 as amended. In addition to the adherence to program procedures CAPBMCI would also employ the services of a qualified third party quality assurance entity. This would be in partnership with the CORE quality assurance that is currently implemented. This would be more cost effective as each weatherization client is also an HEA client.

CAPBMCI has managed the statewide "Stay Warm NH" (\$1.2M) for OEP with great success. All goals were surpassed and funds were even returned to the Public Utilities Commission. CAPBMCI has also been the statewide agency in the implementation of the Electric Assistance Program. This agency is currently partnering with the New Hampshire Community Loan Fund in oversight and management of the RGGI funded Mobile Home Weatherization Program that is also funded by DOE. CAPBMCI has oversight of the weatherization work and monitors the other CAAs.

Due to the reduction in federally funded weatherization and an increasing list of number clients in need of weatherization the NHCAA feels that funding would allow them to employ/ retain energy auditors, staff, crew workers, and contractors that have been trained through the ARRA period. The NCAA feels that this is one of the best and maybe last opportunities to enhance the current WAP with available funds from the Public Utilities Commission to collaborate with the CORE Program. The work through the Weatherization Assistance Program by the CAAs is highly reputable both statewide and nationally and leaves households with greatly reduced energy bills in heating burden and kilowatt usage. Also with the highly trained staff each household is left in a safe condition as it meets the "Health and Safety Protocols" that are required of the Program.

The NCAAs would like to thank you and the Commission for this opportunity to submit our proposal and would be available for any further discussion if required.

Sincerely,



Dana Nute

Director Housing Rehabilitation and Energy Conservation
NCAA appointed intervener to Energy Dockets

CC: New Hampshire Community Action Association Executive Directors

New Hampshire Weatherization Directors Association