

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DE 17-136**

**GAS AND ELECTRIC UTILITIES**

**2018-2020 NEW HAMPSHIRE STATEWIDE ENERGY EFFICIENCY PLAN**

**2020 UPDATE PLAN**

**Order Approving Plan**

**ORDER NO. 26,323**

**December 31, 2019**

APPEARANCES: Matthew J. Fossum, Esq., for Public Service Company of New Hampshire d/b/a Eversource Energy; Patrick Taylor, Esq., for Northern Utilities, Inc., and Unitil Energy Systems; Michael J. Sheehan, Esq., for Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, Inc., and for Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities; Mark W. Dean, Esq., for New Hampshire Electric Cooperative; New Hampshire Legal Assistance, by Raymond Burke, Esq., for The Way Home; Rebecca Ohler for the New Hampshire Department of Environmental Services; Madeleine Mineau, for Clean Energy NH; Office of the Consumer Advocate, by Christa Shute, Esq., for residential ratepayers; and Paul B. Dexter, Esq., and Brian D. Buckley, Esq., for the Staff of the Public Utilities Commission.

This order approves the implementation of an updated energy efficiency plan for 2020 (2020 Update Plan) for electric and gas utilities. The 2020 Update Plan meets the energy efficiency resource standard established by the Commission in Order No. 25,932 and represents the third year of the three-year energy efficiency plan for 2018-2020. The 2020 Update Plan continues the energy efficiency program elements previously approved for 2019. In addition, the 2020 Update Plan expands a demand response pilot demonstration program designed to reduce customer peak demand by including opportunities for residential customers to participate. The 2020 Update Plan also includes revisions to the calculation of performance incentives that utilities can earn by exceeding certain program thresholds. This order also approves rates to

allow utilities to recover program costs, performance incentives, and, in most cases as discussed below, lost base revenue. The rates are more than 12 percent (approximately 0.1 cent per kWh) lower than the rates projected when the Commission approved the 2018-2020 energy efficiency plan. Implementation of the 2020 Update Plan will begin January 1, 2020.

## **I. PROCEDURAL HISTORY**

The Commission established an energy efficiency resource standard (EERS) in Order No. 25,932 (August 2, 2016) (2016 EERS Order). That Order requires the filing of annual updates during each of the three-year EERS plan period. 2016 EERS Order at 41. The following electric and gas utilities (collectively referred to as the Utilities) filed an update for 2020 on September 13, 2019: Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (Granite State Electric), the New Hampshire Electric Cooperative, Inc. (NHEC), Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), and Unitil Energy Systems, Inc. (Unitil) (collectively, the Electric Utilities); and Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (EnergyNorth) and Northern Utilities, Inc. d/b/a Unitil (Northern) (collectively, the Gas Utilities).<sup>1</sup>

The Utilities revised their filing on November 1, 2019, to reflect changes required by budget legislation (HB 4) which was signed into law in the end of September. This newly passed budget bill requires that at least 20 percent of the System Benefits Charge (SBC) funds for energy efficiency be expended on low-income programs. The Utilities' November 1 filing also reflected budget changes associated with Eversource's decision to stop offering Home Energy Reports to its residential customers. On November 13, Staff filed direct testimony. Hearing Exhibits (Exh.) 23, 24, and 25. Clean Energy NH (CENH) filed testimony on November 14.

---

<sup>1</sup> On October 2, 2019, Sunrun Inc. filed a Petition for Intervention, which the Commission has granted.

Exh. 27. On December 12, Eversource filed a Settlement Agreement (Settlement Agreement) signed by all parties<sup>2</sup> Exh 26. In this order, we refer to the 2020 Update Plan as the utilities' original filing as modified on November 1 and by the Settlement Agreement. The Commission held a hearing on the Settlement Agreement and the 2020 Update Plan on December 17. On December 18, Sunrun and CENH filed testimony of Chris Rauscher.<sup>3</sup> On December 20, Granite State Electric filed a revised version of Attachment F-3 (which is part of the 2020 Update Plan) to correct the Lost Base Revenue (LBR) component of that company's proposed SBC rate.<sup>4</sup> Also on December 20, the Utilities filed responses to three record requests posed at the December 17 hearing. *See* Exh. 28-30.

The Settlement Agreement, 2020 Update Plan, and prior docket filings, other than any information for which confidential treatment has been requested of or granted by the Commission, are posted at <http://www.puc.nh.gov/Regulatory/Docketbk/2017/17-136.html>.

## **II. PRE-SETTLEMENT POSITIONS**

### **A. Commission Staff**

On November 13, 2019, Staff filed the testimony of Jay E. Dudley, Elizabeth R. Nixon, and Stephen R. Eckberg. Staff generally supported the Utilities' proposed 2020 Update Plan.

Mr. Dudley recommended approval of the proposed modified Performance Incentive (PI) methodology. That modification was developed by the Performance Incentive Working Group (PIWG), which was established earlier in the triennium to review potential performance

---

<sup>2</sup> The parties include Granite State Electric, NHEC, Eversource, Unitil, EnergyNorth, Northern, the Office of the Consumer Advocate, the Department of Environmental Services, Clean Energy New Hampshire, The Way Home, Conservation Law Foundation, Acadia Center, and Sunrun Inc. Commission Staff also signed the Settlement Agreement.

<sup>3</sup> Sunrun and CENH filed Mr. Rauscher's testimony late, along with a motion seeking leave to file. The Commission has granted that motion.

<sup>4</sup> We address this filing later in this order.

incentive calculation methodologies that could further promote the achievement of energy efficiency.

Ms. Nixon recommended that Eversource's customer engagement platform (CEP) program continue for 2020 and be reviewed in greater detail during the next triennium plan before any further energy efficiency funds are used to support the CEP.

Mr. Eckberg testified that the 2020 Home Energy Assistance (HEA) program budgets meet the 20 percent requirement included in HB 4. Mr. Eckberg also testified that the LBR amounts proposed by each utility for recovery are reasonable, but subject to continued review when the utilities file LBR results for reconciliation in June 2020.

#### **B. Sunrun and CENH**

Sunrun and CENH jointly sponsored the testimony of Chris Rauscher, Director of Policy and Storage Market Strategy at Sunrun. Mr. Rauscher was generally supportive of the planned Residential Demand Reduction Initiative proposed by Eversource and Unitil whereby customers can be compensated for making devices (such as batteries and Wi-Fi thermostats) available to their utility for adjustment during peak demand times. Exh. 27.

### **III. SETTLEMENT AGREEMENT**

On December 12, 2019, the parties filed a comprehensive Settlement Agreement calling for approval of the 2020 Update Plan. Exh. 26. At the hearing held on December 17, all parties recommended that the Commission approve the Settlement Agreement. Staff and Utility witnesses testified that energy efficiency (EE) programs proposed for implementation to be implemented in the 2020 Update Plan, and the resultant rates proposed for collecting program costs, are just and reasonable.

The parties agree that Eversource and Unitil will make a submission no later than March 1, 2020, concerning the demand response programs proposed by Eversource and Unitil. That submission will include, among other things, the results and findings of the 2019 initiative using an active demand benefit cost model currently under development.

The Settlement Agreement provides updated roles for the working groups established in Order No. 26,095 (January 2, 2018) (First Triennium Order). The Settlement Agreement noted that the PIWG and the Lost Base Revenue Working Group have completed their tasks. The Settlement states that the Financing and Funding Working Group made substantial progress resulting in several financing programs being offered in the 2020 Update Plan and recommends the group continue to meet quarterly in 2020 to complete its work concerning funding options. The Benefit/Cost (B/C) Working Group largely completed its tasks culminating with the submission of a proposed cost-effectiveness screening framework on October 31, 2019. The B/C Working Group will continue to meet as needed to address remaining issues concerning non-energy impacts and energy optimization opportunities.

Under the Settlement Agreement, Eversource's Customer Engagement Platform program will continue for 2020. Eversource will continue to track and report on the success of its marketing efforts, including its count of customers using the CEP program who move forward with energy efficiency program offerings.

Consistent with prior settlements in this docket, this Settlement Agreement provides that the Commission will hire a technical consultant on evaluation, measurement, and verification (EM&V) matters. The Settlement Agreement also provides that the Utilities will make a 2020 Update Plan compliance filing (following the form of Exhibits 21 and 22) that will include the corrections that were included in Attachment B to the Settlement Agreement.

#### **IV. SUMMARY OF THE 2020 UPDATE PLAN**

As modified and enhanced by the settlement process, the 2020 Update Plan continues energy efficiency programs implemented for 2018 and 2019 (the first and second years of the first triennium).

##### **A. Program Funding**

The 2020 level of funding for electric programs is \$69,302,537. Exh. 22 at 15. The Electric Utilities propose an EE program SBC rate of \$0.00528 per kWh. That rate is lower than the SBC rate of \$0.00609 projected for 2020 when the EERS was adopted in the 2016 EERS Order. Exh. 22 at 72, 105, 141 and 162; Settlement DE 15-137, Attachment A at 17. The current SBC rate for the 2019 Plan approved in Order No. 26,207 (2019 Update Plan Order) is \$0.00373. 2019 Update Plan Order at 10. Also, consistent with the 2016 EERS Order, each Electric Utility (except for NHEC) proposed an additional SBC component to recover Lost Base Revenue. Exh. 22 at 72 and 162.

The 2020 funding for gas programs is \$11,791,916. Exh. 22 at 17. Each Gas Utility proposed a Local Delivery Adjustment Charge (LDAC) component for EE in its cost of gas proceeding.<sup>5</sup>

##### **B. Industry Budgets**

The 2020 electric program budget is \$65,691,434. Exh. 26 at 21; Exh. 22 at 18.<sup>6</sup> It is allocated across the various sectors as follows: 51 percent for Commercial & Industrial (C&I)

---

<sup>5</sup> Those rates were approved for Northern in Order No. 26,303, (October 29, 2019) and for EnergyNorth in Order No. 26,306 (October 31, 2019).

<sup>6</sup> The electric and gas program budget amounts are less than the funding levels stated above because the budget amounts do not include the performance incentive.

and Municipal sectors; 32 percent for Residential; and 17 percent for Income Eligible. Exh. 22 at 18.

The 2020 gas program budget is \$11,151,972. Exh. 22 at 19; Exh. 26 at 21. It is allocated across the various sectors approximately as follows: 47 percent for C&I and Municipal sectors; 34 percent for Residential; and 19 percent for Income Eligible. Exh. 22 at 19.

### **C. Program Budgets**

The 2020 Update Plan includes essentially the same residential and C&I energy efficiency programs the Commission approved for 2018 and 2019.<sup>7</sup> The 2020 Update Plan and Settlement Agreement, however, contain several significant changes. First, Eversource and Unitil have expanded their demand response offerings to residential customers and will offer monetary incentives to customers who allow the utilities to control certain customer-owned devices (such as batteries and Wi-Fi controlled thermostats) during times of high electric demand. Second, Eversource will no longer be sending Home Energy Reports to customers and instead has re-allocated those funds to other residential offerings such as its Home Performance with ENERGYSTAR® and ENERGYSTAR® Products programs. Third, Unitil and NHEC will increase the amount of funds available for on-bill loans (using unspent over-collections from 2019). Also, Unitil will increase the maximum on-bill financing amount from \$4,000 to \$7,500 for residential customers and to \$15,000 for moderate-income residential customers. In 2020, the Utilities will expand their point of sale distributor relationships to include additional measures such as lighting, electric HVAC equipment, and electric commercial kitchen equipment.

---

<sup>7</sup> A description of each program can be found in Order No. 26,095 at 5-9.

Budgets for various residential, and C&I programs are listed in the following table. For additional details, *see* Exh. 22:

<b>SUMMARY OF 2020 EERS BUDGETS</b>			
	<b>Electric Utilities</b>	<b>Gas Utilities</b>	<b>Total</b>
<b>Residential Program Budgets</b>			
Home Energy Assistance	\$11,503,901	\$ 2,089,441	\$13,593,342
NH Home Performance w/ENERGYSTAR®	\$ 8,592,871	\$ 1,155,804	\$ 9,748,675
ENERGYSTAR® Homes	\$ 3,618,372	\$ 1,087,876	\$ 4,706,248
ENERGYSTAR® Products	\$ 8,016,264	\$ 1,214,683	\$ 9,230,947
Customer Engagement Platform	\$ 267,703	\$ –	\$ 267,703
Home Energy Reports	\$ 275,084	\$ 356,201	\$ 631,285
<b>Commercial &amp; Industrial Program Budgets</b>			
Large Business Energy Solutions	\$17,739,336	\$ 2,931,069	\$20,670,405
Small Business Energy Solutions	\$ 10,038,740	\$ 2,210,387	\$12,249,127
Municipal Program	\$ 2,043,245	\$ –	\$ 2,000,272
RFP Program	\$ 1,482,952	\$ –	\$ 1,195,561
Customer Engagement Platform	\$ 373,126		\$ 373,126

#### **D. Program Financing**

The 2020 Update Plan proposes to continue several financing options currently available to participants, with some enhancements. For example, NHEC and Northern have used prior period over-collections to increase the funding levels available for zero-percent on-bill loans. Unitil has proposed to increase the per participant cap on on-bill loans from \$4,000 to \$7,500 (and to \$15,000 for moderate-income customers) for both electric and gas customers. All the Utilities will continue to offer financing to municipal and business participants, allowing those customers to use energy savings to help pay back their loans. The Funding and Finance Work Group will continue to explore grant funding in 2020.



### **E. Benefit/Cost Screening**

As with the 2019 EE programs, the Utilities screened the proposed 2020 EE programs for cost effectiveness using the Total Resource Cost (TRC) test, which compares the present value of the lifetime benefits of the programs to the Utilities' implementation costs, plus any participant out-of-pocket costs. The energy benefits are evaluated using an Avoided Energy Supply Cost (AESC) study, which is performed on a New England-wide basis and is updated regularly. In this case, the 2018 AESC update was used to screen the 2020 programs. Exh. 22 at 38. As proposed, each utility's portfolio of 2020 EE programs shows a benefit/cost ratio greater than 1.0. Exh. 26 at 28, 32.

On October 31, 2019, the Benefit/Cost Working Group proposed a modified B/C test for effect in the 2021 program year, as anticipated by the 2019 Settlement. We address that proposal in a separate order. *See* Order No. 26,322 (December 30, 2019).

### **F. Evaluation, Measurement, and Verification**

Evaluation, measurement, and verification (EM&V) efforts have the objective of verifying energy savings, estimating future savings, and identifying ways to improve program delivery and results. The basic framework of EM&V activities for 2018-2020 was detailed in the 2016 EERS Order and then accelerated in accordance with terms of the settlement approved in the First Triennium Order. That settlement also formalized the EM&V Working Group, which consists of Staff members, independent EM&V consultants hired and supervised by the Commission, and representatives of the Utilities and the Energy Efficiency and Sustainable Energy Board. Three New Hampshire-specific evaluation activities have begun, or are planned to begin in early 2020.<sup>8</sup> An update of the Strategic Evaluation Plan is scheduled for 2020. In

---

<sup>8</sup> EE Potential Study, Technical Reference Manual, and Large Business C&I Impact and Process evaluation.

2019, independent third-party evaluators working on behalf of the EM&V Working Group completed, or are close to finalizing, evaluations of the C&I Non-Lighting programs, the Home Performance with ENERGYSTAR® program, the Home Energy Assistance Program, and the cross cutting Non-Energy Impacts (NEI) study. Results from those studies that were available in July 2019 were incorporated into the 2020 Update Plan. Exh. 22 at 43-45.

### **G. Performance Incentive**

The 2020 Update Plan included a proposal from the PIWG for a modified performance incentive mechanism for effect with the 2020 EE programs. Exh. 22 at 268-269. Like the PI mechanism that was approved in the 2016 EERS Order, the proposed mechanism offers utilities an incentive to invest in EE rather than traditional infrastructure. Utilities can earn up to 6.875 percent of actual program expenditures by surpassing certain minimum performance thresholds, several of which were increased from the prior mechanism. Importantly, the proposed mechanism introduces incentives for increasing peak demand savings by reducing peak demand usage. The proposal shifts the focus of the PI calculation from the sector level to the portfolio level to help reduce any incentive Utilities have to de-emphasize valuable lower performing programs. Exh. 22 at 39.

### **H. Lost Base Revenue**

The Electric Utilities (except for NHEC) propose that the SBC include collection for revenue lost from decreased electricity sales resulting from the programs. The proposal is, consistent with the framework laid out in the 2016 EERS Order, modified to include a demand component in kilowatts as called for in the settlement approved in the First Triennium Order. The Gas Utilities proposed rates for lost revenue in their individual cost of gas dockets. *See* Order Nos. 26,303 and 26,306.

## V. COMMISSION ANALYSIS

We encourage parties to settle issues through negotiation and compromise because it is an opportunity for creative problem solving, allows the parties to reach a result in line with their expectations, and is often a better alternative to litigation. *Granite State Electric Co.*, Order No. 23,966 at 10 (May 8, 2002); *see* RSA 541-A:31, V(a) (“informal disposition may be made of any contested case ... by stipulation [or] agreed settlement”). Even when all parties join a settlement, however, we must independently determine that the result comports with “applicable standards.” *EnergyNorth Natural Gas, Inc. d/b/a National Grid NH*, Order No. 24,972 at 48 (May 29, 2009). We analyze settlements to ensure that a just and reasonable result has been reached. *Id.*; N.H. Admin. R., Puc 203.20(b).

In this case, we review the 2020 Update Plan for conformity with the 2016 EERS Order and the First Triennium Order, and the law underlying the establishment of an EERS. We are further informed by the New Hampshire 10-Year State Energy Strategy, dated April 2018, at page 15, which calls for New Hampshire to “continue to coordinate and develop energy efficiency programming to achieve cost-effective savings.” The Commission’s authority to review the 2020 Update Plan and related rates arises out of laws governing energy efficiency funding as well as utility rates and long-term resource planning. *See* 2016 EERS Order at 45-49. The EE programs included in the 2020 Update Plan are funded through several sources, including the SBC, the LDAC, Regional Greenhouse Gas Initiative auction proceeds, and Forward Capacity Market revenue. The SBC is “nonbypassable and competitively neutral” and collected through electric customer rates. RSA 374-F:3, VI. The SBC is “used to fund public benefits related to the provision of electricity.” *Id.* The LDAC is a reconciling surcharge

imposed on gas customers, which includes a per-therm charge to recover the costs of gas energy efficiency programs.

Staff and the Utilities testified that the 2020 Update Plan (*i.e.*, the Utilities' proposal as modified by the Settlement Agreement) is just and reasonable and should be approved by the Commission. All parties to this case signed the Settlement Agreement. The parties acknowledge that the 2020 Update Plan includes comprehensive EE programs that are cost-effective. The Settlement Agreement expands a 2019 pilot program to residential customers, aimed at reducing peak demand. The 2020 Update Plan provides for cost recovery of the EE program costs, as well as performance incentives and lost base revenue. The SBC rates that result from this order are more than 12 percent lower (approximately 0.1 cent per kWh) than the rates projected for 2020 when the Commission first approved the 2018-2020 energy efficiency program in 2016. Compare Order No. 25,932 at 53 with Exh. 22 at 72 (Eversource), at 141 (NHEC), and at 162 (Unitil).

A few elements of the 2020 programs warrant additional comment. While we appreciate the efforts to reduce peak demand, we have some concerns about the Active Demand Reduction pilots proposed by Eversource and Unitil. The pilots allow the utilities to use customer-owned devices such as batteries and Wi-Fi thermostats to reduce electricity use during periods of high demand. There may be potential cybersecurity risks associated with the integration of systems installed behind the meter at customers' premises. Eversource and Unitil presented no information concerning cybersecurity, other than the fact that they will have original equipment manufacturers operate the customer equipment when the utility calls for demand reduction. We are not convinced that indirect control of customer equipment fully addresses the potential cybersecurity risks. Consistent with what the Commission required of Granite State Electric, for

its battery storage pilot, before we will permit implementation, we require that Eversource and Unitil complete a comprehensive evaluation of the cybersecurity risks raised by the Active Demand Reduction pilots, including both firmware and software elements. When the evaluation is completed, we direct Eversource and Unitil to file a report confirming that cybersecurity risks for manipulation of electrical usage, access to customer personal protected information, and unauthorized alteration of equipment performance or settings have been addressed. In addition, Eversource and Unitil must complete an evaluation of the relevant vendors' practices and certify them to be sufficient. Further, Eversource and Unitil must outline the measures, detection methods, and mitigation strategies they plan to implement regarding integration of customer-owned equipment and systems installed behind the meter. Finally we direct Eversource and Unitil to explain how they have ensured the Active Demand Reduction pilots comply with the smart metering consent law, RSA 374:62.

Another issue of concern related to the Active Demand Reduction pilots involves distributed generation customers that participate with a customer-owned battery. Net-metered customers with on-site distributed generation should not be permitted to charge their batteries from the grid as part of the Active Demand Reduction pilots. *See Liberty Utilities (Granite State Electric) Corp. d/b/a LibertyUtilities*, Order No. 26,209 at 19, 44 (January 17, 2019) (approving settlement agreement and implementation of battery storage pilot program). Also of concern is the high level of Unitil's administrative costs for this program, which are estimated to exceed the level of incentive for customers (\$72,100 for administration compared to \$50,000 in incentives). Exh. 26 at 20. We recognize that start-up costs can be higher than long-run administrative costs and that the initiative is a pilot. We direct Staff, however, to monitor those costs to determine whether that Unitil expends administrative funds frugally, as Unitil stated it would.

We also question Eversource's plan to cease offering its Home Energy Reports in 2020. This program has proven to be cost-effective in the past. Eversource stated that it intends to achieve the beneficial customer behavioral aspects of this program through other means post-2020. We are concerned that this might lead to additional reliance (and expenditures) on Eversource's CEP, which is not evaluated using a B/C screening test and has shown very limited value in attracting customers to participate in EE programs. Exh. 23 at 22. For the next triennial program Eversource should be prepared to explain what it has learned in 2020 relative to ending the Home Energy Report program, whether the Home Energy Report program should be reinstated, or propose a viable alternative to the Home Energy Report program.

Finally, following the hearing, the Commission discovered errors in Granite State Electric's calculation of its proposed SBC rate and inconsistent numbers in its filings. *See* Exh. 22 Bates Pages 15 and 105. The errors were contained in Attachment F-3 to the Utilities' November 1, filing. On December 20, Granite State Electric filed a revised Attachment F-3. The company did not move to reopen the record or request that the revised attachment be entered into evidence. In addition, neither the parties nor the Commission had opportunity for discovery or to question the company regarding its revised calculations. The Commission has questions regarding Granite State Electric's calculations, particularly with regard to lost base revenues. As a result, we will approve an SBC rate for Granite State Electric that does not include a lost base revenue component. We will allow Staff and interested parties to conduct discovery on Revised Attachment F-3 and promptly schedule an evidentiary hearing for that purpose.

Based on the record, the 2020 Update Plan meets the requirements of the 2016 EERS Order and is consistent with applicable law, including least-cost integrated resource planning requirements promoting energy efficiency. The 2016 EERS Order established an annual energy

savings target and budget. The 2020 Plan Update exceeds the Electric Utility energy savings targets within the budget approved in the 2016 EERS Order. Based on testimony at hearing, the the 2020 Update Plan contains a cost-effective portfolio for each utility. As such, approval of the Settlement Agreement is consistent with prior Commission orders.

Savings from cost-effective EE programs benefit all customers, both participants and non-participants. Participants enjoy direct benefits of increased energy efficiency through lower electricity bills. Both participants and non-participants benefit from on-peak load reduction and related system improvements by mitigating increased regional transmission and capacity costs for New Hampshire. Accordingly, we find the 2020 Update Plan consistent with the public interest, and we approve it.

At the hearing, the Utilities indicated their intention to provide an update to their November 1 filing (Exh. 22) to reflect the terms of the Settlement Agreement. They stated that many updated pages were provided as part of Attachment B to the Settlement (Exh. 26) but that other portions of the full plan should likewise be updated in an effort to present a complete record. We will accept the necessary updates as part of a compliance filing.

**Based upon the foregoing, it is hereby**

**ORDERED**, that the Settlement Agreement filed in this docket on December 12, 2019, is approved; and it is

**FURTHER ORDERED**, that the New Hampshire Statewide Energy Efficiency 2020 Update Plan (the Utilities' proposal as modified by the Settlement Agreement), is approved; and it is

**FURTHER ORDERED**, that the System Benefits Charge rates presented by Eversource in Exhibit 22 at 72, New Hampshire Electric Cooperative at 141, and Unitil at 162, are hereby approved for effect January 1, 2020; and it is

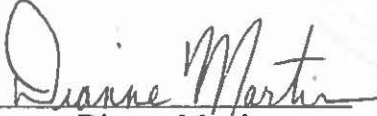
**FURTHER ORDERED**, that Granite State Electric is authorized to collect its proposed System Benefits Charge in Exhibit 22 at 105, without the Lost Base Revenue component for effect January 1, 2020; and it is

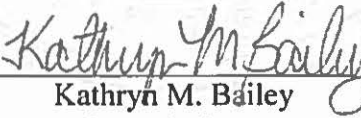
**FURTHER ORDERED**, that Eversource and Unitil file the results of their cybersecurity risk evaluation as described above, before beginning the Active Demand Reduction pilots; and it is

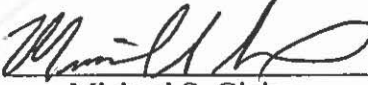
**FURTHER ORDERED**, that each Electric Utility file compliance tariffs within 15 days of this Order; and it is

**FURTHER ORDERED**, that the Utilities file a complete updated version of Exhibit 22, reflecting the changes necessitated by our approval of the Settlement Agreement, within 15 days of the date of this order.

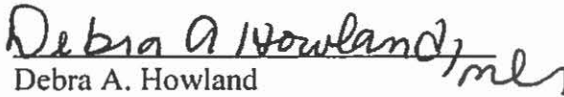
By order of the Public Utilities Commission of New Hampshire this thirty-first day of December, 2019.

  
Dianne Martin  
Chairwoman

  
Kathryn M. Bailey  
Commissioner

  
Michael S. Giaimo  
Commissioner

Attested by:

  
Debra A. Howland  
Executive Director



ExecutiveDirector@puc.nh.gov  
christopher.skoglund@des.nh.gov  
tmartin@resilientbuildingsgroup.cc  
al-azad.iqbal@puc.nh.gov  
allen.desbiens@eversource.com  
asbury@unitil.com  
bob.reals@libertyutilities.com  
brianna@cleanenergy.nh.org  
carroll@unitil.com  
Christa.Shute@oca.nh.gov  
christopher.plecs@eversource.com  
cpeale@clf.org  
craig.wright@des.nh.gov  
cynthia.trottier@libertyutilities.com  
donald.kreis@oca.nh.gov  
downesm@unitil.com  
edward.davis@eversource.com  
epler@unitil.com  
eric.stanley@libertyutilities.com  
erica.menard@nu.com  
frank.melanson@eversource.com  
heather.tebbetts@libertyutilities.co  
henry@cleanenergy.nh.org  
james.brennan@oca.nh.gov  
jarvis@unitil.com  
jmarks@acadiacenter.org  
joseph.fontaine@des.nh.gov  
joseph.swift@eversource.com  
jvanrossum@clf.org  
karen.sinville@libertyutilities.com  
kate@nhsea.org  
katherine.peters@eversource.com  
kristi.davie@eversource.com  
laurel.proulx@eversource.com  
madeleine@cleanenergy.nh.org  
marc.lemenager@eversource.com  
matt.siska@gdsassociates.com  
maureen.karpf@libertyutilities.com  
mbirchard@keyesfox.com  
mdean@mdeanlaw.net  
michael.goldman@eversource.com  
michael.sheehan@libertyutilities.cc  
miles.ingram@eversource.com  
Mosenthal@OptEnergy.com  
ocalitigation@oca.nh.gov  
palma@unitil.com  
pradip.chattopadhyay@oca.nh.gov  
rburke@nhla.org  
rclouthier@snhs.org  
rebecca.ohler@des.nh.gov  
robert.bersak@eversource.com  
robertbackus05@comcast.net  
sarah.knowlton@libertyutilities.com  
scott.albert@gdsassociates.com  
sgeiger@orr-reno.com  
smaslansky@nhcdfa.org  
snowc@nhec.com  
Stephen.Hall@libertyutilities.com  
steven.elliott@eversource.com  
steven.mullen@libertyutilities.com  
stower@nhla.org  
stracy@pierceatwood.com  
taylorp@unitil.com  
teamnh@energyservicesgroup.net  
thomas.belair@eversource.com  
Todd.Bohan@eversource.com  
tomas.fuller@eversource.com  
trooney@trcsolutions.com  
woodsca@nhec.com  
matthew.fossum@eversource.com  
amanda.noonan@puc.nh.gov  
brian.buckley@puc.nh.gov  
deandra.perruccio@puc.nh.gov  
elizabeth.nixon@puc.nh.gov  
F.Ross@puc.nh.gov  
jay.dudley@puc.nh.gov  
karen.cramton@puc.nh.gov

paul.dexter@puc.nh.gov

richard.chagnon@puc.nh.gov

Stephen.Eckberg@puc.nh.gov

steve.frink@puc.nh.gov

suzanne.amidon@puc.nh.gov

tom.frantz@puc.nh.gov