

October 27, 2020

Deborah Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301

**Re: DE 20-092 Electric and Gas Utilities 2021-2023 Triennial Energy Efficiency Plan
Energy Efficiency and Sustainable Energy Board Comments on stakeholder engagement
and 2024-2026 planning process**

Dear Director Howland,

I write today in my capacity as Chair of the Energy Efficiency and Sustainable Energy (EESSE) Board. At our most recent meeting, the Board voted to submit the attached recommendations to the Commission in docket DE 20-092.

Thank you for considering this submission on behalf of the EESSE Board and our recommendations regarding stakeholder engagement and planning process recommendations.

Sincerely,



Madeleine Mineau

Chair

Energy Efficiency and Sustainable Energy Board

At its September 18th meeting the EESE Board discussed the role of its EERS Committee between planning periods and the structure and timeline for developing the next EERS plan. At its October 16th meeting, the EESE Board voted unanimously (with PUC staff abstaining from the vote) in support of the following recommendations and to communicate them directly to the Commission in docket DE 20-092. The EESE Board makes the following recommendations:

The EERS Committee should remain active and engaged in program review, energy efficiency working groups, and any mid-term modifications.

In order to facilitate this participation, the EERS Committee should continue to have access to consultant services on an on-going basis between planning periods.

The planning timeline for the 2024 and beyond plan should consider that current New Hampshire law would requires legislative approval of future increases in the System Benefits Charge to fund energy efficiency. Therefore, the EESE Board proposes the following process:

December 2020 – EESE Board revises charter of EERS Committee as necessary and appoints members of the Committee, to serve during the next triennium.

January 2021-February 2021 – EERS Committee develops request for proposals (RFP) for issuance to potential consultants.

March 2021 – RFP issued by one of the stage agencies represented on the EERS Committee

May 2021 – Winning bidder selected, contract signed, submission to Governor & Executive Council for Approval

July 2021 – Consultant on board and begins work with EERS Committee.

September 2022-November 2022 – EERS Committee works with program administrators to determine and propose EERS savings goals, associated budgets, and SBC rates for 2024-2026 triennium.

December 2022 – The EESE Board and EERS Committee work with program administrators to initiate General Court approval of the proposed SBC rate.

January 2023 – June 2023 – EERS Committee meets to develop EERS plan including priorities, programs, and measures.

July 2023 – EERS plan is submitted to the Commission and adjudicative docket begins.

December 2023 – Order issued by the Commission on EERS plan.

Additional considerations for 2024 and beyond planning process:

- PUC Staff's role and engagement in the collaborative planning process must be clarified.
- The facilitator and consultant contract for the planning process should be with a state agency other than PUC staff such as OCA, DES, OSI, &c.
- The Commission should clarify that no violation of RSA 91-A occurs when EERS Committee members caucus outside of formal EERS Committee meetings since no decisions are made during such caucuses.