



## State of New Hampshire HOUSE OF REPRESENTATIVES

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December 4, 2020

Ms. Debra Howland, Executive Director  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, New Hampshire 03301-7319

Re: Docket: DE 20-092 2021-2023 Triennial Energy Efficiency Plan

Dear Ms. Howland:

We submit the following comment regarding the above-referenced docket on the 2021-2023 New Hampshire Triennial Energy Efficiency Plan (TEEP). The stakeholders of the EESE Board, including the 4 major New Hampshire utilities, have worked tirelessly to define a laudable and workable plan to enable energy efficiency while advancing the state's economic and environmental goals. We the undersigned take exception to the suggestion, put forth in a letter signed by House Speaker Hinch and a group from the House Science, Technology and Energy Committee (dated 11/20/20), that the PUC might simply suspend this vital docket. We would in no way agree that this request is warranted, or that the effort should be considered an official legislative position.

Energy efficiency has the highest cost-benefit return of any energy investment and provides permanent cost-reductions that benefit all energy consumers. In the past 4 years, New Hampshire's energy efficiency and emissions reduction policy efforts have been undermined by reductionist thinking that *further investment is always a bridge too far*. In reality, the 'cost of doing nothing' is well known to be the most-costly course when the future is already here in defining the need for new and cleaner technologies. Preventing common-sense investment in a more energy efficient future for all Granite-Staters is a fiscally imprudent course and we could argue that pursuit of economic advantage has been a major selling point of docket DE 20-092.

The numbers being used to justify suspension of this docket serve to alarm but do nothing to illuminate the full picture of how the TEEP aids the economy while furthering emissions goals. The whole concept of having the utilities' partner to define a 3-year Energy Efficiency Plan is to create a force multiplier in keeping with long-standing energy planning efforts. For example, Dr. Hill, expert witness on behalf of Clean Energy New Hampshire, defines the cost benefits of this plan to a vastly different conclusion.

First, the total proposed budget equals an increase of \$207 million over the current 3-year budget of \$185 million, which works out to \$69 million per year, not \$100 million. Dr. Hill's testimony goes on to say the plan would generate \$912 million in total resource benefits and \$619 million in net benefits. Over the lifetime of the measures, residents would derive \$1.3 billion in energy cost savings. These savings could be reinvested in local economies. These are important details to leave out of a letter that asks you to suspend a docket for the benefit of the New Hampshire economy. The 3-year Energy Efficiency Plan would emphasize income-eligible homes, save 4.4 million tons of GHG emissions and create up to 4,673 FTE jobs.

Another cause for concern is the fact that a non-intervening party to the docket, and long-serving members of the legislature, are somehow under the impression that they should be able to derail such important work simply by offering an ideological opinion, in the face of established laws, long-standing precedent and the evidence brought forth from the labors of those participating in the EERS and EESE board. The implication is that there is a lack of understanding that the Public Utilities Commission considers the cost vs. consumer-benefit of proposed dockets resulting from successful legislation and has authority to determine whether energy program investments buoy or anchor New Hampshire's energy economy.

In fact, many states have recognized that with economic adversity comes opportunity and thus have become more ambitious in adopting comprehensive plans to thwart climate disruption.

Energy efficiency is the low hanging fruit. If we are unable to understand how the Triennium Energy Efficiency Plan (TEEP) benefits New Hampshire, then it does not bode well for our economic recovery. It is the states that are poised to act that will reap the benefit of federal investment in clean energy programs that pave the way of the future. Pulling back on no-brainer policies, 'the fundamentals' if you will, is counter-productive when the advancing energy economy is a key lever to much-needed economic stimulus. This is where growth is possible and contracting our most basic plans harpoons responsible stewardship of New Hampshire's post-COVID19 economic recovery.

The arguments put forth referred to the expenses of businesses and towns being impacted. However, they give no thought to the cost cutting advantage of energy efficiency investments which, once made, provide ongoing benefit. Energy efficiency reduces overall expenses, lowers load, peak-demand and dependence upon out of state fuel sources; this creates greater energy independence and keeps New Hampshire energy dollars, in New Hampshire. The letter from our STE colleagues neglects to mention the benefits of energy efficiency on local jobs, economic stimulus or harmful emissions, long established state goals. We have known for some time that there is more to be done on these fronts and it is only a mindset that *preparing for the future is not the job of government* that has kept us from moving more rapidly toward policies being embraced by our regional peers.

New Hampshire's most costly action is continued delay in furthering our downward emissions trajectory. If we do not have a plan for investing in heat pumps and other clean, local energy options through energy efficiency programs, our share of regional transmission costs will continue to increase and our RGGI rebates will decrease. These factors are within our control, but only if we manage them to the states' advantage. The market is moving on and inaction will not insulate us if we refuse the requisite innovation to meet it. This lack of foresight directly

conflicts with statutory guidance spelled out in New Hampshire law such as RSA 21-I:19 a, I:

## State Facility Energy Cost Reduction

### Section 21-I:19-a

#### **21-I:19-a Energy Efficient Measures; State Policy. –**

I. It shall be the policy of the state of New Hampshire to prioritize public health and environmental quality, while maximizing economic benefits through the use of economical energy efficiency measures including, but not limited to, energy conservation, strategic electrification, fuel switching, cogeneration, renewable energy, and energy storage in the construction, renovation, operation, and maintenance of properties owned or leased by the state. Further, it shall be the policy of the state to encourage municipalities to incorporate such measures into their properties to the greatest extent possible.

To avoid the costly goat-rope for municipalities and businesses of one step forward, two steps back, we implore you to continue with forward-facing decision-making on behalf of the people of New Hampshire.

Now is not the time to reverse course on progress. In fact, the idea that the best course for New Hampshire is to take a workable plan and suspend it because it might cost something to gain something is absurd. That is the business we are all engaged in, figuring out how to gain what we need for our citizens, for the best investment. It is equally absurd to think that doing nothing to further the clean energy economy will help the state recover after the COVID19 economic downturn. It is only by following through on existing plans to stimulate the economy that we will prompt a more rapid recovery.

Energy efficiency investment is the cleanest and most impactful dollar we can spend. Let us maintain a focus on scientific-consensus and long-established legislative objectives to see this necessary docket through to its successful conclusion at this critical time.

Sincerely,

Rep. Renny Cushing, House Democratic Leader, former ST&E member

Science, Technology and Energy Committee members

Rep. Jackie Cali-Pitts

Rep. John Mann

Rep. Kat McGhee

Rep. Rebecca McWilliams

Rep. Lee Oxenham

Rep. Peter Somssich

Rep. Ken Vincent

Former ST&E Chair, Vice Chair, Ranking Members

Robert Backus, Howard Moffett, Bill Baber