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**To:** PUC: <[PUC@puc.nh.gov](mailto:PUC@puc.nh.gov)>; PUC: Executive.Director <[Executive.Director@puc.nh.gov](mailto:Executive.Director@puc.nh.gov)>  
**Subject:** PUC Docket DE 20-092

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Ms. Debra Howland, Executive Director  
New Hampshire Public Utilities Commission

Re: Docket DE 20-092

Dear PUC Commissioners and Staff,

I am concerned that the claims in the November 20, 2020 letter to you, asking for a pause in implementation of the Triennial Energy Efficiency plan, do not arise from a genuine concern over “annual cost-increases on our state’s ratepayers” as stated in that letter. There is reason to wonder whether House Science, Energy & Technology members who signed this letter, Michael Harrington and Michael Vose, have conflicting interests in this case, leading them to oppose any attempt to lessen New Hampshire’s consumption of fossil fuels.

Representative Harrington is on the advisory board of the New England Ratepayers Association, or NERA, which was formed in Massachusetts in 2013. Last spring, NERA petitioned the Federal Energy Regulatory Commission (FERC) to halt net metering nationally. In 2017, NERA’s successful court petition overturned a bill on biomass fuel, passed in the NH Legislature with bipartisan support, effectively putting an end to the biomass industry in NH. NERA succeeded in halting the Massachusetts Cape Wind project in 2013. In their January 2015 “Policy Brief on New Hampshire Energy Policy,” NERA opposes an Energy Efficiency Resource Standard (EERS) on the grounds that “implementing an EERS would be regressive and negatively impact middle and lower-income.” NERA’s Policy Brief also opposes Renewable Portfolio Standards, the Regional Greenhouse Gas Initiative (RGGI), and Net Metering. The 2020 article <https://www.energyandpolicy.org/new-england-ratepayers-association/> cites numerous fossil fuel organizations as supporters of NERA petitions. Representative Harrington’s opposition to the Triennial Energy Efficiency Plan is ideologically in line with his role at NERA—namely, to oppose any action that impedes consumption of fossil fuels.

This past year, records from the NH Secretary of State show that Representatives Harrington and Vose each received campaign contributions of \$2,448.98 from the NH chapter of the national organization Americans for Prosperity (AFP). The January 2021 edition of the NH AFP newsletter features an article advocating for the defeat of the Transportation and Climate Initiative.

Both Representatives Harrington and Vose were listed as members of the board of directors of the Ratepayers Legal Defense Fund, Inc. at its founding in 2018 in Delaware. RLDF is an affiliate of NERA with overlapping memberships.

Here are just a few of the bills from the 2018-2020 legislative sessions, that would have reduced New Hampshire's dependence on fossil fuels. Representatives Harrington and Vose did not support any of these:

- increase energy efficiency (HB 1496, SB 205)
- develop solar projects for the low-income community (SB 165)
- set greenhouse gas emission reduction goals for the state (HB 1664, HB 1496)
- create energy efficiency programs in schools (SB 122)
- create a statewide energy data platform (SB 284)
- make improvements to the Regional Greenhouse Gas Initiative (RGGI) (HB 582)
- support energy storage (HB 715, SB 204)
- support net metering projects of 1-5 megawatts (requested by mayors from 12 of NH's 13 cities) (SB 159, HB 365)

Representatives Harrington and Vose both have financial and ideological conflicts of interest that would sway them to oppose the Triennial Energy Efficiency Plan. It appears that their concern is not for "our state's ratepayers." Like their political donors and the organizations they support, they appear to want New Hampshire's continuing dependence on fossil fuels, and to discourage any plan that would reduce fossil fuel reliance. All the evidence points to Representatives Vose and Harrington vigorously representing out-of-state energy interests, which are in conflict with the interests of the people of NH, whom they were elected to represent.

Thank you for your consideration,

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