



April 9, 2020

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

RE: Docket No. DE 20-092 2021-2023 Energy Efficiency Plan

Dear Director Howland:

I am writing to urge the Commission to provide certainty on the disposition of the Triennial Energy Efficiency Plan (DE 20-092) as soon as possible. As I'm sure you're aware, notice was provided in December that the Commission's decision in this docket would be subject to a one month delay (pushing back the expected decision date to the end of January). We are now well into April and still awaiting a decision. Further delay in issuing a decision will impair demand response providers' ability to add customers to new and existing Active Demand Response programs by the start of the summer, resulting in increased costs to New Hampshire ratepayers

By way of background, CPower is engaged with Eversource, Unitil and Liberty Utilities in implementing Active Demand Response (ADR) programs with their commercial & industrial customers. CPower is working with Liberty Utilities to roll out a new ADR program for 2021. This new program cannot be implemented without an approval from Commission.

The ADR programs are designed to provide notice to C&I customers when the ISO-NE regional electric grid is expected to hit the coincident annual peak. This notice, along with the incentives offered by the ADR programs, encourage participating C&I customers to curtail their loads during the peak hours. Savings flow to the utilities because a significant portion of charges under the ISO-NE Transmission Tariff are allocated based upon the utilities load during the coincident peak hour. To the extent the utilities' peak contribution can be reduced through the ADR programs, savings are generated for all utility customers, not simply those customers participating in ADR.

To date in 2021, CPower has been operating on prior year program approvals. However, we are now at a point where it is critical to know if new limits and new programs proposed for 2021 will be approved by the Commission as filed under the Triennial Plan. Under existing programs with Eversource and Unitil, new customers wishing to participate in 2021 have been put on waiting lists because the programs are at their limits, as approved in prior plans. If these customers are going to participate



during Summer 2021, CPower needs to install equipment on customer meters that will allow customers to monitor their performance in real time. The installation process for these meters is typically 6 – 8 weeks. Without an order in the very near term, customers currently on the waiting list will not be metered in time for the June 1 start of the program.

A feature of ADR that differs from other efficiency programs is that no incentives are paid unless and until customers demonstrate performance. For example, when incentives are paid to fund investments in more efficient lighting or motors, the savings show up after that equipment is installed. Out of pocket costs are incurred before benefits are realized. ADR programs pay no incentives until customers demonstrate performance. If the customer does not perform, there is no risk of having to recover an incentive for benefits that didn't materialize.

Continued delay is costly to all ratepayers. Similar ADR programs have been operating for several years across New England. Those programs have been generating significant savings for participating distribution utilities because they have lower tariff costs based on their reduced contribution to the peak hour. To the extent those utilities continue to reduce their tariff costs, those avoided costs are being collected from customers in other utility territories that don't reduce their contribution to the coincident peak. Unless an order is issued by the NHPUC very soon, NH utilities and ratepayers will be absorbing those additional charges.

Respectfully submitted,

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