

December 10, 2020

Debra A. Howland, Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429  
Via Electronic Mail - [ExecutiveDirector@puc.nh.gov](mailto:ExecutiveDirector@puc.nh.gov)

**RE: DE 20-092, 2021-2023 Triennial Energy Efficiency Plan, Settlement Agreement**

Dear Director Howland:

Acadia Center submits the following letter in support of the proposed Settlement Agreement on the 2021-2023 New Hampshire Statewide Energy Efficiency Plan ("Agreement") filed in the above-mentioned docket concerning the NH Utilities' 2021-2023 Triennial Energy Efficiency Plan ("Plan") for implementing the Energy Efficiency Resource Standard (EERS) established by the Commission through Order No. 25,932 in 2016 via docket DE 15-137.

Acadia Center is a non-profit, research and advocacy organization committed to advancing the clean energy future in the Northeast. Through research and advocacy, Acadia Center envisions a clean, low carbon economy focused on clean technology – not fossil fuels – to heat buildings, power transportation, and generate power. Acadia Center is pursuing reforms that encourage states to Make the Next Decade Count™ by aggressively phasing out fossil fuels and expanding clean energy and energy efficiency to achieve necessary reductions in climate pollution by 2030. These actions will grow the region's economy, create jobs, enhance public health, improve the quality of housing, and increase access to transportation.

Acadia Center supports the northeastern states in researching and promoting consumer-friendly energy efficiency programs for residential, commercial, and industrial customers across all fuel types that reduce energy costs, increase energy efficiency, decrease greenhouse gas emissions, and provide economic development opportunities. Acadia Center has not been active in DE 20-092 because of resource limitations but is a member of the Energy Efficiency Resource Standard (EERS) Committee and participated in Committee meetings and submitted written and oral comments on the NH Electric & Gas Utilities' April 1, 2020 and July 1, 2020 Draft 2021-2023 Plans. Acadia Center commented on multiple components of the draft plans, including energy savings, cost-effective energy efficiency programs, economic development, outreach, workforce development and training, weatherization, data tracking, active demand reduction, energy optimization, marketing and education, building codes, and others.

Acadia Center supports the electric and gas savings levels in the Settlement as it steers New Hampshire in a meaningful way to allow for acquisition of all cost-effective energy efficiency resources across all fuel types and sectors to help NH residents, businesses, and institutions meet their energy needs while reducing the cost of energy. Other Northeast states are making tremendous progress in their energy efficiency programs by maximizing the use of weatherization and energy efficiency measures, reducing economic insecurity from the inefficient use of fossil fuels, and creating new jobs and businesses to deliver affordable energy efficiency products and services. New Hampshire can and should do so, as well.

Acadia Center understands that we face unprecedented challenges due to the COVID-19 pandemic and commends NH Utilities' efforts to continue providing energy efficiency services to NH energy customers. This no time to move backwards. We support the Parties to the Settlement, including the Office of the Consumer Advocate and the NH Utilities, and their work to advance better strategies to implement effective, robust energy efficiency programs and projects in New Hampshire.

New Hampshire needs a bold, effective, and broad-reaching energy efficiency plan for action over the next three years. New Hampshire lags its New England neighbors in overall energy efficiency policies and progress, according to the [American Council for an Energy-Efficient Economy's 2019 national efficiency scorecard](#). While Massachusetts, Connecticut, Rhode Island, and Vermont are in the top 10 for overall state-wide energy efficiency policies, with Massachusetts, Rhode Island, and Vermont all realizing utility savings above 2% of retail sales, New Hampshire remains in the middle of the pack. The State has seen improvements in recent years; however, New Hampshire must do more to become a regional leader on energy efficiency.

New Hampshire deserves to reap the benefits that a more robust NH Saves program can provide. This type of program not only reduces energy use and costs, but improves public health, supports economic progress, and is consumer friendly. New Hampshire has some of the oldest and leakiest housing stock in the nation and a high dependency on fossil fuels for heating. Building heating is also one of the largest sources of greenhouse gas emissions in New Hampshire. A renewed focus on cleaner and better buildings will help make the next leap forward. There is an opportunity to save millions of additional dollars by helping residents and businesses more aggressively reduce energy costs and pollution. Past progress shows that transitioning to a clean energy future will grow the economy, create jobs, enhance public health, improve housing, and increase access to low-carbon heating. This Plan allows flexibility to allow goals, programs, and/or budgets to be adjusted during the triennium as needed, but also recognizes the cost-effective savings needed to drive energy efficiency improvements to better ensure that NH energy efficiency customers and energy consumers realize the substantial benefits of energy efficiency programs.

Acadia Center acknowledges that the 2021-2023 electric and natural gas savings and budgets are more challenging to predict, calibrate, adjust, and establish and that additional analysis and adjustments in the Plan may be likely to be ongoing in the wake of the COVID-19 pandemic. Acadia Center also recognizes that NH utilities will continue to revise and submit additional data on its efficiency program planning and implementation in the face of unforeseeable and/or unavoidable constraints. Savings goals are impacted by a variety of factors, including program costs, availability of the workforce necessary to carry out the efficiency programs, other public policy considerations like equity or carbon emissions reductions, and now, COVID-19.

However, Acadia Center recommends that the NH utilities should strive for at least the annual savings levels that are proposed over a three-year period. A robust, escalating EERS sends a clear signal to the market in residential, commercial, and industrial programs and a level of certainty that encourages more investment in cost-effective energy efficiency.

If you have any questions or concerns, please do not hesitate to contact me at (207) 956-1970.

Respectfully submitted,



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CC: Service List – Docket No. DE 20-092