

June 11, 2021

**Via Electronic Mail Only**

Debra A. Howland, Executive Director  
Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, New Hampshire 03301-2492

73 W. Brook Street  
Manchester, NH 03101

**Marc E. Leménager**  
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**Re: Docket No. DE 20-092, 2021-2023 Triennial Energy Efficiency Plan  
Program Status Update**

Dear Ms. Howland:

On December 29, 2020, the Public Utilities Commission (“Commission”) issued Order No. 26,440, approving a temporary extension of the 2020 System Benefits Charge rate to be applied to the already-existing energy efficiency program structure until a final order regarding the proposed 2021-2023 Statewide Energy Efficiency Plan is issued.

This letter on behalf of the New Hampshire Electric and Natural Gas Utilities: Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; New Hampshire Electric Cooperative, Inc.; Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc. (UES); Liberty Utilities (EnergyNorth Natural Gas) Corp d/b/a Liberty; and Northern Utilities, Inc. (Northern) (collectively, “the NH Utilities”), serves to notify the Commission of program and marketplace impacts that have emerged in the five months of program operation under the existing temporary Order 26,440, and the subsequent next steps that the NH Utilities need to consider under the current regulatory context. To determine what adjustments the residential programs will need for the remainder of 2021, the NH Utilities need to understand what planning structure timeframe the programs will continue to operate under.

The uncertainty surrounding the final budgets for Program Year 2021 is having particular impact on the residential programs, where we are seeing high customer interest and participation. Customers have been placed on waitlists for certain programs experiencing high demand, offerings and incentives have been adjusted in the Products program, and weatherization contractors need more information regarding current and future workload in order to make important business decisions regarding hiring and equipment investments. The NH Utilities need additional clarity in order to provide clear messages to customers and contractors and to appropriately manage program run rates through year end.

It is extremely difficult to determine which program-determinative actions to take, and to what extent, without further clarification on what the final budget will be for 2021 and, even more importantly, whether the NH Utilities can avail themselves of a three-year (36-month) implementation timeframe. In the context of current participation projections for multiple programs, the ability to work within a three-year budget as opposed to a one-year budget would

enable the NH Utilities to best serve the greatest number of customers with minimal disruption to all program participants, both customers and contractors. Scaling back due to budget uncertainty means that the NH Utilities may be deferring projects and cost-effective savings that otherwise could be completed this year.

A three-year budget can counteract any additional need for budget shifts or pauses in program activity this year by offering the NH Utilities the ability to manage the larger total budget within a 36-month timeframe, providing more flexibility and control through marketing and other adjustments that are effective over time and minimize negative impacts to the marketplace. This would preserve the momentum already realized, ensure continuity of program offerings for customers and contractors, mitigate the reduction or pausing of certain programs, and provide the ability to seize opportunities that presently exist but cannot be harnessed with existing budget restrictions. Applying a three-year budget can also avoid administrative burden on the Commission, its Staff, and the NH Utilities, which will allow for effort to remain focused on program implementation and advancement.

The NH Utilities provide this notification letter for the Commission's information and respectfully await further direction from the Commission.

Very truly yours,



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Energy Efficiency  
o/b/o the NH Utilities

cc: DE 20-092 Service List (by electronic mail only)