



# City of Dover, New Hampshire

November, 21 2021

Daniel Goldner, Chair  
Public Utilities Commission  
21 S. Fruit Street, Suite 10 Concord, NH 03301  
Via Electronic Mail Only

RE: DE 20-092, Electric and Gas Utilities, 2021-2023 Triennial Energy Efficiency Plan

Dear Mr. Goldner,

On behalf of the City of Dover's Energy Commission, I respectfully request that the New Hampshire Public Utility Commission reverse its ruling, Order 26,553, relative to the implementation of the triennial energy efficiency plan as we believe this ruling will have a profound, negative impact on both residents and businesses in our community. We encourage you to accept the 2021-2023 New Hampshire Statewide Energy Efficiency Plan filed by the electric and gas utilities in Docket DE 20-092.

Dover takes seriously its responsibility to ensure our residents have a high quality of life. To that end, the City has consistently relied on NHSaves to both reduce our operating costs and improve the quality of our environment. We estimate that 30% of our residents have also taken advantage of NHSaves with similar goals.

New England has very high electric rates. All the other New England states are working to address this with effective energy efficiency programs and are, in spite of growth, decreasing their electric energy consumption while New Hampshire's consumption continues to rise. As a result, New Hampshire ratepayers bear an increasing portion of the transmission and distribution rates for the ISO New England grid.

Dover is concerned about the negative impacts the current ruling will have on our economy and our residents. Investments in cost-effective energy efficiency programs and projects as proposed in the Triennial Plan benefit all ratepayers. Because of your decision, it is likely that New Hampshire's transmission and distribution rates will continue to rise. Reducing utility investment in energy efficiency programs will result in New Hampshire becoming even less competitive, increasing the difficulty of attracting and retaining businesses, and making affordable housing less available for employees. There will be a direct loss of local jobs for energy efficiency providers. More money will leave the State to pay for imported fossil fuels that power our grid. In testimony before the Commission, it was estimated that under the utilities'

proposal, 17,500 new job-years would be created and there would be a \$3.5 billion in increased economic output statewide.

This ruling will impact our disadvantaged residents the hardest. Through the efforts of Community Action Partnership of Strafford County's (CAPSC) weatherization program, heating cost reductions for clients have been great enough that they no longer need to decide between paying a utility bill or putting food on the table.

Your decision is already having a negative impact. As of this letter, CAPSC is in the process of withdrawing over \$1 million in support of existing projects and cancelling all planned projects in 2022, including Dover Children's Home. Also, Eversource, the City's electric utility, has just suspended their NHSaves program.

Dover believes the responsible, fiscally prudent, and wise choice for our City and our State is to adopt the utilities proposed plan that had years of refinement and the support of all participating intervenors. This plan is based on a model that ensures all efficiency investments would be tested to guarantee they benefit all ratepayers. We know that the average return on efficiency investments yield three dollars in savings for every dollar invested. We adamantly urge the PUC to reconsider this ruling.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert Carrier", written in a cursive style.

Robert Carrier, Mayor