



**CLEAN ENERGY NH**

Your Voice in All Energy Matters

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June 3, 2022

Daniel C. Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

**RE: DE 20-092, 2022-2023 Energy Efficiency Plan  
Motion for Rehearing**

Dear Chair Goldner,

This letter is submitted by Clean Energy NH (CENH) in support of the Motion for Rehearing and Clarification of Order No. 26,621 filed jointly on May 27, 2022 by the NH electric and gas utilities, and the letter filed by the Office of the Consumer Advocate (OCA) on June 3, 2022.

Like the OCA, CENH particularly shares the concern regarding the Commission's interpretation of the new language in RSA 374-F:3, VI-a(d)(4), which requires each electric utility to plan for at least 65 percent of program-related energy savings to come from reductions in electricity consumption rather than fuels such as oil and propane. As the utilities and OCA note, requiring the NHSaves program to meet a 65 percent threshold for **both** an annual and a lifetime basis, rather than annual alone, will have a negative impact on the funding and programs available to residential electric customers.

Like the NH energy utilities, it is our view that the impact of the PUC's interpretation would not only be create inconsistent program offerings throughout the state and, therefore, prevent the NHSaves programs from providing equitable benefits to customers, but it would also be inconsistent with longstanding practice for calculating efficiency plan's goals. Utilizing the annual measure of the energy efficiency plan's savings be determined solely on an annual basis will result in a more consistent, equitable, and robust plan development and administration.

CENH, therefore, urge the Commission to grant the NH energy utilities' motion for rehearing. Please do not hesitate to contact me with any questions regarding this filing.

Thank you for your attention to this matter.

Sincerely,

/s/ Chris Skoglund

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Enclosures

Cc: Service List DE 20-092 (via email)