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ELIJAH D. EMERSON  
ADMITTED IN VT, NH, MA AND ME  
eemerson@primmer.com  
TEL: 603-444-4008  
FAX: 603-444-6040

106 Main Street | P.O. Box 349 | Littleton, NH 03561-0349

September 9, 2020

**VIA EMAIL**

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

Re: DE 20-092, 2021-2023 Triennial Energy Efficiency Plan

Dear Ms. Howland:

On September 2, 2020, the Office for the Consumer Advocate, Acadia Center and the Conservation Law Foundation (together as the “Movants”) filed a Motion for Designation of Staff Advocates Pursuant to RSA 363:32 (the “Motion”). The underlying basis of the Motion is during the stakeholder engagement process that resulted in the Triennial Energy Efficiency Plan (the “Plan”), Staff Attorney Paul Dexter and Electric Division Analyst Elizabeth Nixon demonstrated a lack of neutrality that is required by the Public Utilities Commission (the “Commission”) in this matter. The Motion requested that these staff members be designated as advocates and be prohibited from having *ex parte* communication with the Commission. Through this letter, Clean Energy New Hampshire (“CENH”) supports the Motion..

CENH participated actively in the Energy Efficiency Resource Standard (“EERS”) committee process and witnessed Commission staff, as named in the Motion, make statements and express concerns relating to specific rate impacts being discussed in relation to the Plan. CENH was among the group of stakeholders urging the NH Utilities to adopt ambitious savings targets and agrees with the Movants that certain staff members acted as advocates in the EERS committee process. For reasons of fairness and consistent with due process, CENH believes it is in the best interest of all parties to have these staff members designated as advocates. This will allow the staff members to continue to pursue a set of concerns raised in the stakeholder process and allow the Commission to operate in a necessarily neutral manner. For these reasons, CENH requests that the Commission grant the Motion. If the Commission determines that the designation is not mandatory pursuant to RSA 363:32(I), it should use its discretion under RSA 363:32(II) and (III) because there is good reason (controversial and significant proceeding) and it will enable a prompt and orderly proceeding.

This letter is filed in electronic format in accordance with the Commission’s suspension of the paper-filing rules. Hard copies of the filing will not follow.

Thank you,

Regards,



Elijah D. Emerson

Cc: Commission's Electronic Service List, DE 20-092

**New Hampshire Public Utilities Commission**

**2021-2023 Triennial Energy Efficiency Plan  
DE 20-092**

**Electronic Service List:**

[ExecutiveDirector@puc.nh.gov](mailto:ExecutiveDirector@puc.nh.gov)

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[richard.chagnon@puc.nh.gov](mailto:richard.chagnon@puc.nh.gov)

[jessica.chiavara@eversource.com](mailto:jessica.chiavara@eversource.com)

[gary.cronin@puc.nh.gov](mailto:gary.cronin@puc.nh.gov)

[paul.dexter@puc.nh.gov](mailto:paul.dexter@puc.nh.gov)

[jay.dudley@puc.nh.gov](mailto:jay.dudley@puc.nh.gov)

[Stephen.Eckberg@puc.nh.gov](mailto:Stephen.Eckberg@puc.nh.gov)

[tom.frantz@puc.nh.gov](mailto:tom.frantz@puc.nh.gov)

[nkrakoff@clf.org](mailto:nkrakoff@clf.org)

[donald.kreis@oca.nh.gov](mailto:donald.kreis@oca.nh.gov)

[mcdonald@optenergy.com](mailto:mcdonald@optenergy.com)

[Mosenthal@OptEnergy.com](mailto:Mosenthal@OptEnergy.com)

[elizabeth.nixon@puc.nh.gov](mailto:elizabeth.nixon@puc.nh.gov)

[amanda.noonan@puc.nh.gov](mailto:amanda.noonan@puc.nh.gov)

[ocalitigation@oca.nh.gov](mailto:ocalitigation@oca.nh.gov)

[Christa.Shute@oca.nh.gov](mailto:Christa.Shute@oca.nh.gov)

[jvanrossum@clf.org](mailto:jvanrossum@clf.org)