

Responses of New Hampshire Public Utilities Commission Staff

Docket No. DE 20-092
2021-2023 Triennial Energy Efficiency Plan
NH Utilities Set 1 Data Requests

Received: November 4, 2020

Date of Response: November 17, 2020

Request Number: Utilities 1-031

Witness: Elizabeth Nixon

Request:

Page 31-32: Staff recommends significant changes to the proposed NEI adders in the benefit/cost test, both the factors themselves and how they are applied, including the use of adders rather than specific dollar values. Please provide the analysis and support relied upon to reach conclusions related to NEI adders in the benefit/cost test and the rationale to justify Staff's recommendation of the values proposed for the secondary GST test's NEI adder values. Why isn't the custom-tailored "each program, each utility" NEI adder approach favored for its capacity for greater accuracy? What trade-off is there for switching to an "across the board" approach?

Response:

Staff's recommendation was based on the updated percentages provided by the utilities in data response Staff 1-013, which was included as Attachment ERN-6 in Nixon's testimony. Given that the utilities have proposed an NEI percentage to be applied to all residential programs and another NEI percentage to all C&I programs by utility based on the proposed programs, Staff recommended that an across the board adder would simplify the calculation for the secondary test given that the actual measures installed will presumably vary from those proposed and which formed the basis for the NEI percentage adders by utility and sector. Given that this NEI percentage is being applied in the secondary test, a simplified approach is preferred over a more complex and precise approach.