



BUSINESS & INDUSTRY ASSOCIATION
New Hampshire's Statewide
Chamber of Commerce

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

October 12, 2023

RE: Docket No. DE 23-068 2024-2026 Triennial Energy Efficiency Plan; BIA public comments in support of the NH Saves Program

Dear Chairman Goldner:

I'm writing to express the Business and Industry Association's (BIA) support for the 2024-2024 triennial energy efficiency plan, currently under consideration in NH PUC Docket No. DE 23-068. BIA respectfully requests the Commission approve the plan as filed by the state's electric and gas utilities to ensure stability for the state's efficiency programs and the businesses that rely on these programs. We support the framework supporting energy efficiency as established by the legislature in HB 549 (2022) and SB 113 (2023), which solidify continuity in program offerings for New Hampshire residents and businesses.

BIA is New Hampshire's statewide chamber of commerce and leading business advocate. We also serve as the New Hampshire Manufacturing Association and are the official affiliate of the National Association of Manufacturers. We represent about 400 leading employers across the state in a variety of industries, including energy efficiency. Member firms employ over 90,000 people in New Hampshire, which represents one in seven jobs and contributes \$5 billion annually to the state's economy. Many of our members are large energy consumers in manufacturing, healthcare, financial services, and educational institutions that have large campuses with associated large energy bills throughout the state.

For businesses, it is imperative to provide certainty and stability for energy efficiency programs, which HB 549 and SB 113 did by codifying the core components of energy efficiency programming, ensuring that those programs continue without disruption or structural modification. New Hampshire businesses rely on energy efficiency funding and programs being dependably available. By having program certainty and continuity in place, businesses can reasonably plan for long-term projects that would result in more significant energy savings by utilizing offerings they know will remain available.

In the legislature, both HB 549 and SB 113 were crafted with careful consideration and input from a wide variety of stakeholders. The legislature provided a solution after ratepayers, both residential and commercial, expressed concerns about the devastating effects of losing energy efficiency programs and funding. Sustaining the program offerings as supported by these newly enacted laws is the best way to sustain energy efficiency while protecting New Hampshire businesses from immediate and significant SBC cost increases.

BIA respectfully asks the Commission to not overstep its adjudicative authority by upending the legislative intent of HB 549 and SB 113, and to approve the 2024-2026 triennial energy efficiency plan as proposed by the joint utilities to ensure stability for energy efficiency funding and programs for New Hampshire's businesses as doing so will help enable them to remain competitive. Thank you for considering this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Skelton", with a long horizontal flourish extending to the right.

Michael Skelton
President & CEO
Business & Industry Association of New Hampshire