

**New Hampshire Utilities**  
**Docket No. DE 23-068**

**Date Request Received: September 22, 2023**  
**Data Request No. PUC 3-001-1**

**Date of Response: October 11, 2023**  
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**Request from: New Hampshire Public Utilities Commission**

**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

The joint utilities are requested to fill in the following tables, for electric and gas, respectively, to provide a 2024 snapshot of the incentive dollars per measure and unit cost per measure. Incentive per unit of measure should be calculated from the Calculations Yr Tabs (column J divided by the quantity in column G) in the B/C models. Unit cost per measure, in the second table, is defined as the actual cost of performing one unit of each measure without any incentive.

Incentive Per Measure (\$/Unit of Measure) in 2024						
Measure	Measure ID	Company 1	Company 2	Company 3	Company 4	Difference between Lowest and Highest

Unit Cost per measure (\$/Unit of Measure) in 2024						
Measure	Measure ID	Company 1	Company 2	Company 3	Company 4	Difference between Lowest and Highest

**Response:**

Please refer to Attachment PUC 3-001-01 for the requested information. The Utilities also note that the Inputs Yr tabs of the BC models show the per unit Incentives in Column J and the Total Resource Costs in Column I. It should also be noted that the total cost and rebate by definition are based on the *average* project and that for most measures, projects, rebates and TRCs are not fixed, but rather vary depending on the customer's need. Variations among the Utilities are based on a combination of past experience and future expectation of each utility based on demand in their territory for the measure, customer mix, customer size and other factors. Variations among the Utilities and from year-to-year are therefore to be expected.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

Reference the ADR B/C models, specifically the Load Curtailment Targeted Dispatch for the Residential versus C&I sectors.

1. The Commission requests the following information to be filed for each Company through a joint response:

ADR Input - Company Name				
Measure	Class	Incentive (\$)	Quantity	Unit Cost (\$)
Direct Load Control Targeted Dispatch Upfront/Annual Incentive Summer	Residential			
Load Curtailment Targeted Dispatch P4P Summer	C&I			

2. Please explain any variations in the per-unit incentive for the same measure across utilities.

**Response:**

Please refer to Attachment PUC 3-001-02 for the requested information. Please also refer to the response provided to PUC 2-001-04. Additionally, Table 5.3, on Bates pages 80-81 provides the incentive levels for the ADR programs and each utility's ADR BC Model provides each company's participants by program.

A primary driver of incentive costs for the Residential ADR program's Wi-Fi thermostat measure is the varying need of each utility to invest in acquiring new enrollees. Recruiting and incenting new enrollees requires an upfront cost that exceeds the incentive provided to existing enrollees for their ongoing participation year-over-year. Each of the utility's programs anticipates investing in engaging additional enrollees, but Liberty is starting from scratch beginning in 2024, offering this measure to customers for the first time. The incentives that are paid per kW saved (batteries for Eversource and the C&I ADR programs for all utilities) are based on the actual reductions achieved at each site and therefore vary based on the type, scale, and curtailment realized by the technology or process undertaken to reduce load during events.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

Please provide in live MS Excel format a consolidated table across Electric and Gas utilities that breaks down the following information (in dollars) for 2022:

Company Name <sup>α</sup>	Total Electric Benefits in 2022 (\$) <sup>α</sup>	Total Non-Electric Benefits in 2022		Total Benefits for Granite State Test (\$) <sup>α</sup>
		Resource (\$) <sup>α</sup>	Non-Resource (\$) <sup>α</sup>	
□	□	□	□	□
□	□	□	□	□

\*Insert rows for each Company¶

**Response:**

Please refer to Attachment PUC 3-001-03 for the requested information.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

On Bates page 97 of the Plan, the joint utilities state that the "EM&V measures 'impact factors', including the percentage of energy saving actually realized (i.e., realization rates), based on independent third-party analysis of completed projects." The Commission notes that the B/C models use a range of realization rates, including 114% non-electric realization rates for Home Performance and 35% for Energy Star Homes New Construction Code Compliance, whereas the net-to-gross factor applied is 100% in most cases, but as low as 23% for LED bulbs (ES Appliances).

1. Please explain how these factors for each measure have been assigned, accompanied by references and supporting evidence, as available.
2. Please explain how these factors are mathematically captured in the model to ascertain impacts on the final costs.

**Response:**

1. Please refer to Attachment S, the NH Technical Reference Manual for Estimating Savings from Energy Efficiency ("TRM"). Realization rates are described as follows:

"The realization rate is used to adjust the gross savings (as calculated by the savings algorithms) based on impact evaluation studies. The realization rate is equal to the ratio of measure savings developed from an impact evaluation to the estimated measure savings derived from the savings algorithms. Depending on the impact evaluation study, there may be separate Realization Rates for electric energy (kWh), peak demand (kW), or non-electric energy (MMBtu)." (Bates page 1115).

For each measure offered by the Utilities and included in the B/C model, a realization rate, in-service rate and net to gross factor (a combination of free-ridership and spillover) has been assigned consistent with its entry in the TRM. That TRM entry includes detailed, footnoted,

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and hyperlinked references to specific evaluations from which the impact factor has been derived. For Home Performance with Energy Star, realization rates are derived from the study conducted by Opinion Dynamics and published June 11, 2020 (see endnote 8 on Bates 1128). Free-ridership and spillover factors associated with lighting are derived from multiple sources, as referenced in TRM Chapter 1.35. LED Bulb (Bates 1266-1273), and for retail lighting in particular are based on an evaluation prepared by NMR Group for Connecticut and described in endnote 16.

While Measures EA1a029 and GA1a010 related to “Residential New Construction Code Compliance” were included in the NH Utilities’ BC models, these measures, as well as others related to code compliance in the C&I new construction market, relate to efforts originally conceived of and included in the Utilities’ 2021-2023 Triennial Energy Efficiency Plan and B/C model. These measures were not removed when adapting the models for the Proposed 2024-2026 Triennial energy efficiency plan. However, the Utilities have not proposed, and do not plan to claim, any energy savings related to the promotion of more energy efficient building codes in New Hampshire during the 2024-2026 term.

2. The B/C models apply each measure’s impact factor as shown in the Inputs tab to the relevant measure rows in the Calculations tabs to adjust gross savings. Benefits are then based on the net energy savings. Realization rates are not applied to rebates or total resource costs at the measure level; however, net-to-gross factors *are* applied to measure level TRCs to attribute to each measure the appropriate savings, benefits and incremental costs associated with the utility’s intervention. Incentive costs are not factored by the net-to-gross rates because the rebate is the same, whether the program induced the customer to opt for the measure or not. At the program and portfolio level, the Cost Table, Primary Data and all linked outputs reflect 100 percent of the actual costs associated with utility’s incentives, regardless of the impact factors assigned to any individual measure or program.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

Provide historical data for all utilities that shows sub-program-level expenditures (in dollars) from 2017 to 2022.

			Actual Expenditure (\$)					
Program	Sub-Program	Company Name	2017	2018	2019	2020	2021	2022

**Response:**

Please refer to Attachment PUC 3-001-05 for the requested information. Please note that the Utilities do not allocate non-measure-specific costs, such as overhead costs, at a granularity finer than the program level, as conveyed in response to PUC 2-001-10. Therefore, the figures presented in Attachment PUC 3-001-05 are representative of customer incentive costs only and will not sum to the total costs for each program.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

Please provide support for the \$675 million estimate outlined in Record Request Response 1-001-2 by helping the Commission identify the relevant information from a representative B/C Model. The response should offer guidance and references to the appropriate Excel tabs and/or cells.

**Response:**

Please refer to the response provided to PUC 2-002-01 and Attachment PUC 2-002-01. The lifetime savings contained in Column C of Attachment PUC 2-002-01 are derived from the Utilities' BC Models.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

Refer to the B/C models LookUps tab: With respect to the application of real discount rate:

1. Please state whether the real discount rate for costs is simply applied to the total costs directly in the Primary Data tab to bring those costs to 2024 dollars.
2. Please confirm that the discount rate for benefits is applied in a different tab than the Primary Data Tab.
3. If the responses to parts 1 and 2 are in the affirmative, please explain why the approaches to apply discount rates were modeled differently for benefits and costs.
4. Please confirm whether all discounted benefits that eventually flow into the Primary Data tab are in 2024 dollars.

**Response:**

1. The nominal discount rate is applied to Total Program Costs in column N and Participant (Customer) Costs in column R of the Primary Data tab to adjust these costs to 2024 dollars.
2. The application of the discount rate applied to benefits is done in the Avoided Costs tab, not the Primary Data tab.
3. The avoided costs from the AESC 2021 study were presented in 2021 dollars. The Avoided Costs tab of the model is where all nominal 2021 avoided costs are adjusted to 2024 dollars, with the net present value of the cumulative avoided costs calculated as a second step. The cumulative net present value avoided costs are used to calculate benefits in the Calculations tabs, which then flow to the Primary Data tab, which is where all applicable information is aggregated for use in the reporting output tabs (Cost Effectiveness, Benefits, and PI tabs).

Nominal costs are first listed on the Costs tab, and then flow to the Primary Data tab where they are converted to 2024 dollars.

4. Please see the response to part 3 of this question.



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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

In live MS Excel format:

1. Provide a yearly breakdown, for 2024 to 2026, of the projected number of participating customers in the Plan by rateclass.

Planned Number of Participating Customers by Rate Class			
Rate Class	2024	2025	2026

\*>Insert rows as needed.¶

2. Provide the actual number of participating customers by rate class in 2020, 2021, and 2022.

Actual Number of Participating Customers by Rate Class			
Rate Class	2024	2025	2026

\*>Insert rows as needed.¶

**Response:**

The NH Utilities do not plan for, track, or report on customers participating in the energy efficiency programs by rate class and therefore cannot provide the requested information. For information on planned participation by sector (I.e., Residential, Income Eligible and Commercial & Industrial), please refer to Attachment B (Bates pages 104-115) of the June 30, 2023 Plan filing. For historical participation by sector, please refer to each utility's annual PI filings.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

1. In MS Excel, provide historical B/C ratios at the overall portfolio-level and sector level from 2018 to 2023.

B/C Ratios						
<b>Sector-Level</b>	2018	2019	2020	2021	2022	2023
Income Eligible						
Residential						
C&I						
<b>Portfolio-Level</b>						

2. In the same Excel sheet, provide projected B/C ratios at the overall portfolio-level and sector level from 2024 to 2026.

B/C Ratios			
<b>Sector-Level</b>	2024	2025	2026
Income Eligible			
Residential			
C&I			
<b>Portfolio-Level</b>			

**Response:**

Please refer to Attachment PUC 3-001-09 for the requested information for each utility. Data for program years 2018-2022 has been retrieved from each utility's annual performance incentive filings, data for 2023 has been retrieved from Attachments E-J of the March 1, 2022 Plan filing in Docket No. DE 20-092, and data relating to the 2024-2026 planning period has been retrieved from Attachments E-J of the Proposed 2024-2026 Triennial Energy Efficiency Plan filing. Please note that 2018-2023 data reflects the Income Eligible programs as part of the Residential sector.

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Please also note that B/Cs were based on a different set of costs and benefits prior to the adoption of the Granite State Test. Comparing B/Cs based on B/C cost tests other than that which is currently in place will not yield informative analysis as to the relative costs and benefits of the currently proposed programs.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

For each of the utilities, please provide page 304 of FERC Form 1 for the most recent year in MS Excel format. If the NHEC does not file this information, readily available comparable data is requested.

**Response:**

Please refer to Attachment PUC 3-001-10 for the requested information.

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**Request:**

**Subset 1 - Inquiries Related to Benefit-Cost ("B/C") Testing**

Please provide for all utilities combined, a summary of electric benefits by end use category for the 2024-2026 Plan:

<b>End Use</b>	<b>Percentage of Total Electric Benefits</b>	<b>Percentage of GST Benefits</b>	<b>Percentage of TRCT Benefits</b>
(e.g., Envelope)			
(e.g., HVAC)			
(e.g., Lighting)			
(e.g., non-energy savings)			
<b>Total</b>	100%	100%	100%

**Response:**

Please refer to Attachment PUC 3-001-11 for the requested information.

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**Request from: New Hampshire Public Utilities Commission**

**Request:**

**Subset 2 - Funding and Program Details**

Refer to Bates Page 73 of the Plan.

1. For 2022, please provide the requested information that relates to the interplay of the Electric Assistance Program and Income-Eligible Home Energy Assistance Program:

EAP Tiers <sup>α</sup>	EAP <sup>α</sup>		EE <sup>α</sup>		Number of Customers on both EAP and EE <sup>α</sup>
	Number of Participants <sup>α</sup>	Total Incentive (\$) <sup>α</sup>	Number of Participants <sup>α</sup>	Total Incentive (\$) <sup>α</sup>	
1 <sup>α</sup>					
2 <sup>α</sup>					
3 <sup>α</sup>					
4 <sup>α</sup>					
5 <sup>α</sup>					
6 <sup>α</sup>					
7 <sup>α</sup>					
8 <sup>α</sup>					
<b>TOTAL<sup>α</sup></b>					

2. If the goal of the energy efficiency program is to incentivize energy savings, have utilities monitored whether the EAP discounts impact the effectiveness of EE programming? If so, how, and if not, why not?

**Response:**

1. The Electric Energy Assistance (“EAP”) program does not have “participants” in the same way that the energy efficiency programs do. Rather, customers who are income qualified are eligible to enroll in the EAP and thereby receive a discount on their electric rate. The discounted rate is not considered or called an “incentive” but is rather a bill assistance mechanism funded by all ratepayers to help eligible customers afford service and avoid the risk of having their electric service shut off for non-payment.

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However, in order to participate in the income-eligible energy efficiency program, a customer must be eligible for the discount rate. In practice, many customers participating in the income eligible energy efficiency programs do so through their residency in a low-income or public housing complex. Whether these customers are actually receiving the discounted rate that they are eligible for is unknown, and therefore the Utilities cannot match customers who participated in one or more of the EE programs with participation in the EAP discount rate.

2. The Utilities are unaware of any evidence that rate discounts impact the effectiveness of EE programming. However, the energy burden among this population is so high that combining rate discounts and robust energy efficiency programming is a state policy priority, as evidenced in both statutes governing energy efficiency and the EAP. Combining these benefits is also considered best practice and a necessary method for meeting this policy objective, allowing the limited funds available through the EAP program to be more efficiently deployed. Please refer to <https://www.aceee.org/toolkit/2021/04/supporting-low-income-energy-efficiency-guide-utility-regulators> for additional information.

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**Request from: New Hampshire Public Utilities Commission**

**Request:**

**Subset 2 - Funding and Program Details**

Please provide a breakdown of the Program Costs in live MS Excel format with supporting schedules (e.g., Company’s quarterly reports) in the following format:

	<b>Historical (Quarterly) Total Program Costs (\$)</b>											
	2020				2021				2022			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
HEA												
Non-HEA												
Non-HEA customer Cost												
Total Residential												
C&I												
C&I customer cost												
Grand Total of Program Costs												

**Response:**

Please refer to Attachment PUC 3-002-02 for the requested information aggregated from the Utilities’ quarterly reports. Please note that the information contained in the quarterly reports is not necessarily representative of the final settled data for each utility, as reported in each utility’s annual performance incentive filings. Please also note that these quarterly reports do not capture the participating customer’s contribution toward the total cost of energy efficiency projects, and that information is unavailable on a quarterly basis. Finally, customers participating in the HEA program do not provide a co-pay and therefore their “cost” is zero.



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**Request:**

**Subset 2 - Funding and Program Details**

Please provide historical spending information, beginning in 2020, on the incentives provided each quarter in the following format:

	<b>Historical (Quarterly) Spending on Incentives (\$)</b>											
	2020				2021				2022			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
HEA												
Non-HEA												
Total Residential												
C&I												
Grand Total of spending												

**Response:**

Please refer to Attachment PUC 3-002-03 for the requested information aggregated from the Utilities' quarterly reports. Please note that the information contained in the quarterly reports is not necessarily representative of the final settled data for each utility, as reported in each utility's annual performance incentive filings.

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**Request:**

**Subset 2 - Funding and Program Details**

1. Please discuss how weatherization and other economic benefits are accounted for in calculating the HEA benefits.
2. What is the total non-resource benefit that (in dollars) added per project for HEA in the Plan?
3. What is the expected breakdown of HEA funding by: (i) property owners who are low-income; (ii) low-income renters; and, (iii) low-income rental propertyowners.

**Response:**

1. The Utilities note that weatherization in and of itself is not an economic benefit. The energy and non-energy benefits associated with the measures delivered within the HEA program, including weatherization, are calculated based on the energy savings generated by the interventions. Additionally, certain non-energy impacts (“NEIs”), or benefits, are claimed for HEA weatherization projects. While there are additional economic benefits associated with energy efficiency programs, the Utilities do not include such benefits in cost-effectiveness testing per the Granite State Test. Please refer to the response to PUC 2-001-10 for additional information.
2. \$405.71 is valuation of the Non-Energy Impacts per weatherization project (defined as the count of homes receiving insulation or air sealing measures), per the “Non-Energy Impacts” section within the “Lookups” tab in the BC Models, which in turn is based on a non-energy impact study performed by a third-party evaluation firm completed in 2020.
3. Please refer to the response to PUC 1-005-6 part 4. The tenant/owner distinction is not one that the Utilities or the Community Action Agency partners have historically tracked, and therefore there are no forecasts for the expected split of projects or benefits between income-eligible property owners and tenants. However, participation is distinguished between single-

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family (“SF”) versus multi-family (“MF”) building types, which could be used as a proxy. However, some single-family homes are occupied by tenants, the single-family designation encompasses 1-4 family buildings, and some 5+ unit multi-family properties may be owner-occupied. Therefore, SF / MF designation is an imperfect indicator of ownership status.

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**Request:**

**Subset 2 - Funding and Program Details**

How will the Home Energy Reports program tie in with the activities associated with the Active Demand Response measures?

**Response:**

The Home Energy Reports (“HERs”) measure is distinct from and unrelated to the Active Demand Response measures. They are both categorized as “behavioral” interventions because they do not directly incentivize the installation of any energy-saving equipment. In the case of HERs, customers receive information and recommendations via mail and/or email about changes they can make to reduce energy usage in their home (such as turning off lights, installing thermal curtains, washing laundry in cold water, etc.). These behavioral changes typically occur sometime after the intervention. On the other hand, the residential ADR program compensates participants who allow the utility to temporarily change the set point of their controlled air conditioning unit during a peak event. Thus, the two types of interventions are distinct and do not ‘tie in’ with each other.

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**Request:**

**Subset 2 - Funding and Program Details**

Reference Bates page 64 of the Plan. With respect to the Energy Star Retail Products Program (ESRPP):

1. How are retailers selected for the ESRPP program? Please provide details on the selection criteria and/or guidelines.
2. Please describe how the performance metrics of the ESRPP program are expected to be tracked.

**Response:**

Please refer to the response to PUC 2-003-01, which indicates that New Hampshire's analysis of the ESRPP has not yet commenced and no conclusions or decisions have been made and to refer to Attachment PUC 2-003-01 for the Connecticut evaluation of the ESRPP.

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**Request:**

**Subset 2 - Funding and Program Details**

Refer to Bates page 41, Section 3.2.1, of the Plan. The Commission notes that the joint utilities are conducting a “Beyond Lighting” evaluation.

1. What percentage of costs and benefits were attributed to lighting in the previous Triennial Plan?
2. What percentage of costs and benefits are attributed to lighting (in \$ and % of total program costs and benefits) in the proposed plan, for each program under both C&I and residential sectors?

**Response:**

While technically there was no triennial plan that preceded the Proposed 2024-2026 Triennial Energy Efficiency Plan, the costs and benefits attributed to lighting by combining the results of the 2021 continuation plan with the 2022-2023 approved plan is provided in Attachment PUC 3-002-07. Please note that the Utilities do not allocate non-measure-specific costs, such as those associated with administration, implementation services, marketing and EM&V, at a granularity finer than the program level, (please see the response to PUC 2-001-10). Therefore, the figures presented in Attachment PUC 3-002-07 reflect expenditures on *customer incentives* for lighting, and *all costs* at the portfolio level.

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**Request:**

**Subset 2 - Funding and Program Details**

Please complete the table with actual data. Provide a split by electric and gas customers of revenues collected through the SBC and LDAC charges, respectively. The response should also provide the annual kWh savings and number of participants for each (e.g., in Table 4-4 format from Plan).

	2017	2018	2019	2020	2021	2022
<b>ELECTRIC</b>						
SBC						
Annual kWh Savings						
Number of Participants						
<b>GAS</b>						
LDAC						
Annual MMBtu Savings						
Number of Participants						

**Response:**

Please refer to Attachment PUC 3-002-08 for the requested information. Please note that in addition to SBC funding, the electric programs are also funded by proceeds from the Regional Greenhouse Gas Initiative (“RGGI”) and Forward Capacity Market (“FCM”) as well as any carryover / under and interest that each electric utility receives, utilizes, or incurs. Therefore, the SBC revenue per kWh saved does not reflect the total cost to achieve savings and should not be used as a guide for either past or future performance.

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**Request:**

**Subset 2 - Funding and Program Details**

Refer to Bates page 44-45 (Section 3.3.1) of the Plan.

1. Do the customers of governments with municipal utilities pay SBC?
  - a. If yes, does the proposed budget under the EE program reflect those funds?
  - b. If not, please explain the rationale for the eligibility of local governments with municipal utilities to participate in the Municipal Program.
2. How are the "technical assistance" costs accounted for (e.g., incentives, internal, external, administrative costs, etc.) within EE programming?

**Response:**

1. No. Residents who live in towns with municipal utilities do not pay the SBC rate, but their town governments are allowed to access the NH Electric Utilities' Municipal Programs pursuant to RSA 125-O:23, III.(b). The Electric Utilities' Municipal Programs are funded entirely from proceeds of the Regional Greenhouse Gas Initiative and not System Benefits Charge funds.
2. Technical assistance costs are included within the "Customer Incentives" accounting category. Table 1-11 on Bates page 28 of the Plan filing states that Customer Incentives are "Reimbursement to vendors for the cost of direct services to customers and/or rebates provided directly to customers resulting in measurable energy or capacity savings. Includes the cost of energy audits, technical studies and expert support, and the appropriate deployment of energy saving measures or services."



**New Hampshire Utilities**  
**Docket No. DE 23-068**

**Date Request Received: September 22, 2023**  
**Data Request No. PUC 3-003-1**

**Date of Response: October 11, 2023**  
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**Request from: New Hampshire Public Utilities Commission**

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**Request:**

**Subset 3 -Further Questions on the 2024-2026 Plan**

Please provide the critical path for each of the phases of the two-phase studies outlined in Attachment P on Bates Page 657 of the Attachments associated with the 2024-2026 Plan.

**Response:**

A more detailed critical path schedule for the planned impact and process evaluations that appears in Table 2 of the Strategic Evaluation Plan (Bates pages 658-659 of the attachments to the Proposed 2024-2026 Triennial Energy Efficiency Plan) has not yet been developed.

New Hampshire Utilities  
Docket No. DE 23-068

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Page 1 of 1

Request from: New Hampshire Public Utilities Commission

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**Request:**

**Subset 3 -Further Questions on the 2024-2026 Plan**

Please complete the table below for residential (non-HEA) programs and a separate table for C&I programs:

<u>Subsidy Level</u> (%) <sup>□</sup>	<u>Number of</u> <u>Projects</u> <sup>□</sup>	<u>Total Cost</u> (\$) <sup>□</sup>	<u>Total Incentives</u> (\$) <sup>□</sup>
0-19% <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>
20-39% <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>
40-59% <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>
60-79% <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>
80-99% <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>
100% <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>
<b><u>Grand Total</u></b> <sup>□</sup>	<sup>□</sup>	<sup>□</sup>	<sup>□</sup>

**Response:**

Presuming that the question is referring to the 2024-2026 Plan, the inputs to the B/C model for most measure rows are based on estimates of *average costs* and *average incentives* for activity that has not yet occurred, and therefore it is not possible to provide a schedule of the number of projects at various levels of subsidy. The Utilities have provided similar information for prior years' actual results as part of the Commission's reporting requirements in Order No. 26,621.

For a list of residential measures in the Energy Star Products Program in which the TRC and the rebate are fixed, please see Attachment PUC 2-002-04, which includes the planned quantity, TRC and incentive per measure, as well as total incentives. As described above, most other measures in the BC model utilize average incremental costs. Actual rebates, incremental costs and "subsidy level" will vary depending on each customer and each measure.