New Hampshire Utilities
Docket No. DE-068

Date Request Received: August 4, 2023
Data Request No. PUC 1-001-3

Date of Orig. Response: August 25, 2023
Date of Revised Response: October 17, 2023

Request from: New Hampshire Public Utilities Commission

Request:
Subset 1 - Plan Executive Summary
Reference Bates page 14 of the Plan. The joint utilities state that "[a]ll changes to the Plan are largely budgetary or administrative, with program structure and offerings remaining largely unchanged."

1) Please highlight the budgetary and/or administrative changes.
2) On what basis have joint utilities decided to maintain programs and offerings as largely unchanged?
3) Please provide a list of the programs that have not been allocated funding in the Plan that received funding between 2021 and 2023.

Revised Response:

1) **Budgetary Changes**
Given recent legislative changes regarding the fixing of energy efficiency funding portions of the SBC and LDAC rates, budgets are relatively fixed whereas under the Energy Efficiency Resource Standard ("EERS") framework, budgets and savings were proposed based on the energy efficiency targets agreed upon through the stakeholder and settlement process. While budgets in the proposed 2024-2026 plan are derived from the energy efficiency funding rates in the SBC and LDAC, RGGI auction proceeds, and FCM revenues, they differ year-over- year and among the utilities based on each utility's projected sales volumes and the legislatively mandated escalation in energy efficiency rates. Further, each utility's and program's relative share of the sector budget has been adjusted from prior periods in order to reflect recent experience in the marketplace, and expected changes in emphasis in the coming term. Examples include, but are not limited to, updates to building energy codes, federal appliance standards, and the sunsetting of rebates for certain measures (e.g., residential lighting).

Administrative Changes

Refining Expenditure Types: Administrative changes include a refining of the definition of expenditure types, which more clearly isolates expenditures on customer incentives, and the more definitive treatment of income-eligible as its own sector in order to better track relevant budgets and expenses.

Implemented Three-year Term: The Utilities also included an administrative change

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relating to the implementation of a single three-year term, including those related to budgeting, reconciliation, periodic reporting, requests for interim modifications, and performance incentives.

Cost Benefit Model, TRM Updates: Finally, the cost-benefit models underpinning the savings and benefits calculations were updated to reflect the most recent Technical Reference Manual ("TRM"), which was reviewed and approved by the EM&V Working Group (see Attachment S of the Plan filing).

In its electric B/C model, Unitil inadvertently included production related to discontinued residential lighting measures in its Energy Star Products program, which are not reflective the most recent TRM. The Company does not intend to offer these measures and will repurpose customer incentives to other, energy-saving measures in the program. Please refer to the revised response to PUC 3-002-07 (Revised) for a more detailed explanation of this issue.

2) For the past year, the Utilities participated in a stakeholder process with other likely parties to the docket in order to identify changes to program design or delivery that should be included in the 2024-2026 Plan. While modest changes have been proposed, including the addition of a natural gas Municipal Program, the conversion of the Active Demand Response pilot to a full program, a greater emphasis on capturing electric savings related to HVAC, and a focus on workforce development, the Utilities propose to continue the existing successful, and award-winning program designs, and overall portfolio structure. This structure was in place when HB 549 was passed, and therefore complies with the most recent changes to New Hampshire statute as well as continuing to be consistent with existing applicable state law, furthers the state's energy strategy, and achieves optimal energy savings, system benefits, and positive participant outcomes.

3) There were no programs offered in 2021 through 2023 where funding was eliminated in the proposed 2024-2026 Plan.

Original Response:

1) **Budgetary Changes**
   Given recent legislative changes regarding the fixing of energy efficiency funding portions of the SBC and LDAC rates, budgets are relatively fixed whereas under the Energy Efficiency Resource Standard ("EERS") framework, budgets and savings were proposed based on the energy efficiency targets agreed upon through the stakeholder and settlement process. While budgets in the proposed 2024-2026 plan are derived from the energy efficiency funding rates in the SBC and LDAC, RGGI auction proceeds, and FCM revenues, they differ year-over- year and among the utilities based on each utility's projected sales volumes and the legislatively mandated escalation in energy efficiency rates. Further, each utility's and program's relative share of the sector budget has been adjusted from prior periods in order to reflect recent experience in the marketplace, and expected changes in emphasis in the coming term. Examples include, but are not limited to, updates to building energy codes, federal appliance standards, and the sunsetting of rebates for certain measures (e.g., residential lighting).

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   Refining Expenditure Types: Administrative changes include a refining of the definition of expenditure types, which more clearly isolates expenditures on customer incentives, and the more definitive treatment of income-eligible as its own sector in order to better track relevant budgets and expenses.

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3) There were no programs offered in 2021 through 2023 where funding was eliminated in the proposed 2024-2026 Plan.

Request:
Subset 2 - Plan Chapter 1 re: 2024 - 2026 Plan Overview
Reference Bates pages 17-18 of the Plan, tables 1-1 and 1-2.

1) Provide comparable "baseline data."
2) Clarify whether "cumulative program funding" includes performance incentive payments.

Revised Response:

1) Due to the constant evolution of the Energy Efficiency programs since 2018, there is no baseline data to directly compare the programs over time. It is important to note that the proposed programs in the 2024-2026 Plan were developed in compliance with HB 549 and SB 113, which effectively set a new baseline: setting the scale of energy efficiency programs by establishing funding at 2020 levels and tying any energy efficiency funding increases in the SBC and LDAC rates to the rate of inflation. This is in stark contrast to the 2018-2020 and 2021-2023 planning processes where stakeholders first established energy efficiency goals and then budgets and rates subsequently designed to achieve those goals, which is what was ultimately proposed to the Commission for approval. Now, there are no SBC and LDAC funding "changes" to compare to previous plan levels, because HB 549 wiped the slate clean by setting funding levels. Further, energy efficiency programs in New Hampshire, and elsewhere throughout the country, evolve to overcome new and emerging barriers to the adoption of energy efficiency, target different types of equipment, and reach different participants, and therefore the same funding can provide a different "baseline", as savings potential can vary. In the process, the efficiency baselines against which savings are measured are updated, evaluation assumptions are updated, and the cost to achieve savings typically increases. Please refer to Attachment PUC 1-002-1 for the requested information.

   Footnotes in the attachment detail how energy savings, the basis of which changes over time, were depicted in any given year. These changes include how savings were reported (i.e., based on adjusted gross values for 2018-2020 and net values for 2021-2026), and which baseline year was referenced when estimating energy savings achieved as a "percent of sales" (2014 baseline year for 2018-2020, 2019 baseline year for 2021-2023, and 2022 baseline year for 2024-2026). Given the evolving nature of programs, economic conditions, evaluation, and changing kWh and therms sales,

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readers should use caution in comparing goals, benefit-cost ratios, number of participants, or the cost-to-achieve savings from one year, or one period, to the next, as each program year or period should be viewed in its total, discrete context. This will provide the most informative and accurate assessment of the value of savings compared with available funding.

A final caution regarding comparisons from year to year concerns the evolving role of energy efficiency lighting measures in the NHSaves portfolio. Until recently, high efficiency residential lighting was a major source of relatively inexpensive energy savings, but as of 2023 has been removed from the residential portfolio due to the transformation of that market.[1] While savings from energy efficient lighting remains an important element of the C&I portfolio, lifetime kWh savings for many types of lamps and fixtures in that sector have been reduced by more than 50% since 2022 due to the transformation of that market as well.

2) 'Cumulative program funding' in Tables 1-1 and 1-2 does not include performance incentive funds.

Original Response:

1) Due to the constant evolution of the Energy Efficiency programs since 2018, there is no baseline data to directly compare the programs over time. It is important to note that the proposed programs in the 2024-2026 Plan were developed in compliance with HB 549 and SB 113, which effectively set a new baseline: setting the scale of energy efficiency programs by establishing funding at 2020 levels and tying any energy efficiency funding increases in the SBC and LDAC rates to the rate of inflation. This is in stark contrast to the 2018-2020 and 2021-2023 planning processes where stakeholders first established energy efficiency goals and then budgets and rates subsequently designed to achieve those goals, which is what was ultimately proposed to the Commission for approval. Now, there are no SBC and LDAC funding "changes" to

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A final caution regarding comparisons from year to year concerns the evolving role of energy efficiency lighting measures in the NHSaves portfolio. Until recently, high efficiency residential lighting was a major source of relatively inexpensive energy savings, but as of 2023 has been removed from the residential portfolio due to the transformation of that market. While savings from energy efficient lighting remains an important element of the C&I portfolio, lifetime kWh savings for many types of lamps and fixtures in that sector have been reduced by more than 50% since 2022 due to the transformation of that market as well.

2) 'Cumulative program funding' in Tables 1-1 and 1-2 does not include performance incentive funds.

New Hampshire Utilities
Docket No. DE-068

Date Request Received: August 4, 2023
Data Request No. PUC 1-005-2

Date of Orig. Response: August 25, 2023
Date of Revised Response: October 17, 2023

Request from: New Hampshire Public Utilities Commission

Request:
Subset 5 - Plan Chapter 4 re: NHSaves Residential and Income Eligible Energy Efficiency Programs
Reference Bates page 63. The joint utilities state "[t]he transformation of the residential lighting market has changed both the measure mix and scale of this program...."
1) Are any lighting measures still available in the residential suite of programs?
2) If so, describe these measures.

Revised Response:

Yes, limited high efficiency lighting measures for income-eligible customers are still offered through the NHSaves programs. Standard A-line screw-in bulbs have been discontinued as these are now considered baseline (i.e., there are no energy savings that can be attributed to the programs as a result of interventions related to these bulbs). However, lighting controls and certain strip lighting are still cost-effective and offered by the programs where appropriate.

Although Unitil inadvertently included production related to discontinued residential lighting measures in its Energy Star Products program, the Company does not intend to offer these measures over the 2024-2026 term. Please refer to the revised response to PUC 3-002-07 (Revised) for a more detailed explanation of this issue.

Original Response:

Yes, limited high efficiency lighting measures for income-eligible customers are still offered through the NHSaves programs. Standard A-line screw-in bulbs have been discontinued as these are now considered baseline (i.e., there are no energy savings that can be attributed to the programs as a result of interventions related to these bulbs). However, lighting controls and certain strip lighting are still cost-effective and offered by the programs where appropriate.

Request:
<u>Subset 3 -Further Questions on the 2024-2026 Plan</u>

Refer to Section 4.3.2 of the Plan.

1. What percentage of total savings (in $ and kWh) is from the lighting measures in the current programs? Please provide the data in the format of Table 4-3 at Bates page 65 of the Plan.
2. What were the percentages in the previous 2021-2023 Triennial Plan and what were the actuals? Please provide the data in the format available in Table 4-3 at Bates page 65 of the Plan.

Revised Response:

Please note that Section 4.3 of the Plan refers specifically to the Residential ENERGY STAR® Products program, and section 4.3.2 refers to that program's "design and priorities".

Attachment PUC 2-003-03 shows for 2021 and the 2022-2023 Plan the planned and actual statewide expenditures related to residential lighting rebates in the Retail Program, as well as associated annual and lifetime kWh savings, summer kW savings, and the percent lighting measures represented relative to the ENERGY STAR® Products program overall. Because participants typically purchase or are provided more than one lightbulb at a time, participation is based on the assumption that each customer received 4 lightbulbs.

As stated in the 2024-2026 Plan and elsewhere, residential lighting measures are not being offered in the 2024-2026 term under the ENERGY STAR® Products program, thus there is no budget, savings or participants.[1]

Original Response:

Please note that Section 4.3 of the Plan refers specifically to the Residential ENERGY STAR® Products program, and section 4.3.2 refers to that program's "design and priorities".

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[1] Please note that Unitil's B/C model for the 2024-2026 Plan inadvertently included residential lighting measures in the Energy Star Products program, however these measures have been discontinued and will not in fact be offered. Please see the revised response to PUC 3-002-07 (Revised) for a detailed explanation of this issue.

Attachment PUC 2-003-03 shows for 2021 and the 2022-2023 Plan the planned and actual statewide expenditures related to residential lighting rebates in the Retail Program, as well as associated annual and lifetime kWh savings, summer kW savings, and the percent lighting measures represented relative to the ENERGY STAR® Products program overall. Because participants typically purchase or are provided more than one lightbulb at a time, participation is based on the assumption that each customer received 4 lightbulbs.

As stated in the 2024-2026 Plan and elsewhere, residential lighting measures are not being offered in the 2024-2026 term under the ENERGY STAR® Products program, thus there is no budget, savings or participants.

New Hampshire Utilities
Docket No. DE-068

Date Request Received: August 4, 2023
Data Request No. PUC 2-003-12

Date of Orig. Response: September 22, 2023
Date of Revised Response: October 17, 2023

Request from: New Hampshire Public Utilities Commission

Request:

<u>Subset 3 -Further Questions on the 2024-2026 Plan</u>

Please summarize the total dollars allocated for 2024, 2025, and 2026 by end use (e.g., lighting, weatherization, etc.)

Revised Response:

Please refer to Attachment PUC 2-003-12, which summarizes the statewide total nominal incentive dollars associated with each end use for each year of the Plan.

Illustrating what was discussed in the response to Request PUC 2-001-09, Attachment PUC 2-003-12 shows only incentives provided directly to customers by end use and does not capture the payment to vendors for the costs of their services. As a result, the sum of these incentive amounts at the measure level, aggregated by end use, will not reconcile with the sub-program incentive totals on the Costs and Primary Data tab.

Please note that Unitil's B/C model inadvertently included lighting measures in the Energy Star Products program that have been discontinued and will not be offered. Customer incentives associated with these measures total $103,875 over the term. Please see the revised response to PUC 3-002-07 (Revised) for a more detailed explanation of this issue.

Original Response:

Please refer to Attachment PUC 2-003-12, which summarizes the statewide total nominal incentive dollars associated with each end use for each year of the Plan.

Illustrating what was discussed in the response to Request PUC 2-001-09, Attachment PUC 2-003-12 shows only incentives provided directly to customers by end use and does not capture the payment to vendors for the costs of their services. As a result, the sum of these incentive amounts at the measure level, aggregated by end use, will not reconcile with the sub-program incentive totals on the Costs and Primary Data tab.

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?

Revised 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.

Part 2 of the original attachment accompanying this response concerning percentage and costs of benefits attributed to lighting in the proposed plan reflected values for Unitil Energy Systems, Inc. ("Unitil") that unintentionally reflected just one year of the 2024-2026 Plan rather than the term as a whole. Attachment PUC 3-002-07 (Revised) reflects the values for the three-year term for Unitil and as updated statewide.

Both the original and revised attachments concerning the second part of the question include costs and benefits in the Energy Star Products Program associated with residential lighting measures that have been discontinued and will not be offered as part of the 2024-2026 Plan. Accordingly, Unitil's planned measure mix for the 2024-2026 Plan will necessarily be different than the actual measure mix. Updating the measure mix to reallocate rebates from residential lighting measures

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to other measures will result in *de minimis* changes to portfolio-wide benefits and B/C ratios for the residential sector in particular and the portfolio as a whole.

Specifically, as shown in Attachment PUC 3-002-07 (Revised) (calculations highlighted in yellow), the lighting measures included in Unitil's plan B/C model that will no longer be offered comprise 5.06 percent of the planned budget for the Energy Star Products program, and 0.97 percent of that program's benefits (utilizing the Granite State Test). When compared to the portfolio as a whole, the lighting products being discontinued comprise 0.49 percent of the portfolio budget and just 0.09 percent of the portfolio benefits, based on the plan B/C model.

Although Unitil inadvertently included residential lighting measures in the plan B/C model measure mix, their impact is insignificant in terms of both costs, benefits and energy savings at the portfolio level and over the term. It is important to note that the B/C model is reflective of a bottom-up exercise in estimating the number of units of each measure that will be rebated in order to produce program, sector and portfolio-level savings and benefits goals. The utility's performance is appropriately measured at the portfolio level based on the Granite State Test, which considers the utility's overall achievement of annual and lifetime savings and net benefits over the term. That performance is reviewed and reported quarterly throughout the term, culminating in a term report that will compare actual performance against planned performance, at the portfolio level. Ultimately, the inclusion of these lighting measures has a *de minimis* impact on Unitil's overall plan as reflected in the revised Attachment, and actual offerings will be consistent with the Plan design as described in Exhibit 1. The customer incentives in Unitil's B/C model associated with the discontinued lighting measures will be directed to other measures within the Energy Star Products program, which will also realize energy savings and associated benefits.

Original 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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Subset 1 - Plan Executive Summary
Reference Bates page 14 of the Plan. The joint utilities state that "[a]ll changes to the Plan are largely budgetary or administrative, with program structure and offerings remaining largely unchanged."

1) Please highlight the budgetary and/or administrative changes.
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1) **Budgetary Changes**
   Given recent legislative changes regarding the fixing of energy efficiency funding portions of the SBC and LDAC rates, budgets are relatively fixed whereas under the Energy Efficiency Resource Standard ("EERS") framework, budgets and savings were proposed based on the energy efficiency targets agreed upon through the stakeholder and settlement process. While budgets in the proposed 2024-2026 plan are derived from the energy efficiency funding rates in the SBC and LDAC, RGGI auction proceeds, and FCM revenues, they differ year-over- year and among the utilities based on each utility's projected sales volumes and the legislatively mandated escalation in energy efficiency rates. Further, each utility's and program's relative share of the sector budget has been adjusted from prior periods in order to reflect recent experience in the marketplace, and expected changes in emphasis in the coming term. Examples include, but are not limited to, updates to building energy codes, federal appliance standards, and the sunsetting of rebates for certain measures (e.g., residential lighting).

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   Refining Expenditure Types: Administrative changes include a refining of the definition of expenditure types, which more clearly isolates expenditures on customer incentives, and the more definitive treatment of income-eligible as its own sector in order to better track relevant budgets and expenses.

   Implemented Three-year Term: The Utilities also included an administrative change

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relating to the implementation of a single three-year term, including those related to budgeting, reconciliation, periodic reporting, requests for interim modifications, and performance incentives.

Cost Benefit Model, TRM Updates: Finally, the cost-benefit models underpinning the savings and benefits calculations were updated to reflect the most recent Technical Reference Manual ("TRM"), which was reviewed and approved by the EM&V Working Group (see Attachment S of the Plan filing).

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2) 'Cumulative program funding' in Tables 1-1 and 1-2 does not include performance incentive funds.

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compare to previous plan levels, because HB 549 wiped the slate clean by setting funding levels. Further, energy efficiency programs in New Hampshire, and elsewhere throughout the country, evolve to overcome new and emerging barriers to the adoption of energy efficiency, target different types of equipment, and reach different participants, and therefore the same funding can provide a different "baseline", as savings potential can vary. In the process, the efficiency baselines against which savings are measured are updated, evaluation assumptions are updated, and the cost to achieve savings typically increases. Please refer to Attachment PUC 1-002-1 for the requested information.

Footnotes in the attachment detail how energy savings, the basis of which changes over time, were depicted in any given year. These changes include how savings were reported (i.e., based on adjusted gross values for 2018-2020 and net values for 2021-2026), and which baseline year was referenced when estimating energy savings achieved as a "percent of sales" (2014 baseline year for 2018-2020, 2019 baseline year for 2021-2023, and 2022 baseline year for 2024-2026). Given the evolving nature of programs, economic conditions, evaluation, and changing kWh and therms sales, readers should use caution in comparing goals, benefit-cost ratios, number of participants, or the cost-to-achieve savings from one year, or one period, to the next, as each program year or period should be viewed in its total, discrete context. This will provide the most informative and accurate assessment of the value of savings compared with available funding.

A final caution regarding comparisons from year to year concerns the evolving role of energy efficiency lighting measures in the NHSaves portfolio. Until recently, high efficiency residential lighting was a major source of relatively inexpensive energy savings, but as of 2023 has been removed from the residential portfolio due to the transformation of that market. While savings from energy efficient lighting remains an important element of the C&I portfolio, lifetime kWh savings for many types of lamps and fixtures in that sector have been reduced by more than 50% since 2022 due to the transformation of that market as well.

2) 'Cumulative program funding' in Tables 1-1 and 1-2 does not include performance incentive funds.

New Hampshire Utilities
Docket No. DE-068

Date Request Received: August 4, 2023
Data Request No. PUC 1-005-2

Date of Orig. Response: August 25, 2023
Date of Revised Response: October 17, 2023

Request from: New Hampshire Public Utilities Commission

Request:
Subset 5 - Plan Chapter 4 re: NHSaves Residential and Income Eligible Energy Efficiency Programs
Reference Bates page 63. The joint utilities state "[t]he transformation of the residential lighting market has changed both the measure mix and scale of this program...."
1) Are any lighting measures still available in the residential suite of programs?
2) If so, describe these measures.

Revised Response:

Yes, limited high efficiency lighting measures for income-eligible customers are still offered through the NHSaves programs. Standard A-line screw-in bulbs have been discontinued as these are now considered baseline (i.e., there are no energy savings that can be attributed to the programs as a result of interventions related to these bulbs). However, lighting controls and certain strip lighting are still cost-effective and offered by the programs where appropriate.

Although Unitil inadvertently included production related to discontinued residential lighting measures in its Energy Star Products program, the Company does not intend to offer these measures over the 2024-2026 term. Please refer to the revised response to PUC 3-002-07 (Revised) for a more detailed explanation of this issue.

Original Response:

Yes, limited high efficiency lighting measures for income-eligible customers are still offered through the NHSaves programs. Standard A-line screw-in bulbs have been discontinued as these are now considered baseline (i.e., there are no energy savings that can be attributed to the programs as a result of interventions related to these bulbs). However, lighting controls and certain strip lighting are still cost-effective and offered by the programs where appropriate.

Request from: New Hampshire Public Utilities Commission

Request:
Subset 3 -Further Questions on the 2024-2026 Plan

Refer to Section 4.3.2 of the Plan.

1. What percentage of total savings (in $ and kWh) is from the lighting measures in the current programs? Please provide the data in the format of Table 4-3 at Bates page 65 of the Plan.
2. What were the percentages in the previous 2021-2023 Triennial Plan and what were the actuals? Please provide the data in the format available in Table 4-3 at Bates page 65 of the Plan.

Revised Response:

Please note that Section 4.3 of the Plan refers specifically to the Residential ENERGY STAR® Products program, and section 4.3.2 refers to that program's "design and priorities".

Attachment PUC 2-003-03 shows for 2021 and the 2022-2023 Plan the planned and actual statewide expenditures related to residential lighting rebates in the Retail Program, as well as associated annual and lifetime kWh savings, summer kW savings, and the percent lighting measures represented relative to the ENERGY STAR® Products program overall. Because participants typically purchase or are provided more than one lightbulb at a time, participation is based on the assumption that each customer received 4 lightbulbs.

As stated in the 2024-2026 Plan and elsewhere, residential lighting measures are not being offered in the 2024-2026 term under the ENERGY STAR® Products program, thus there is no budget, savings or participants.[1]

Original Response:

Please note that Section 4.3 of the Plan refers specifically to the Residential ENERGY STAR® Products program, and section 4.3.2 refers to that program's "design and priorities".

[1] Please note that Unitil's B/C model for the 2024-2026 Plan inadvertently included residential lighting measures in the Energy Star Products program, however these measures have been discontinued and will not in fact be offered. Please see the revised response to PUC 3-002-07 (Revised) for a detailed explanation of this issue.

Attachment PUC 2-003-03 shows for 2021 and the 2022-2023 Plan the planned and actual statewide expenditures related to residential lighting rebates in the Retail Program, as well as associated annual and lifetime kWh savings, summer kW savings, and the percent lighting measures represented relative to the ENERGY STAR® Products program overall. Because participants typically purchase or are provided more than one lightbulb at a time, participation is based on the assumption that each customer received 4 lightbulbs.

As stated in the 2024-2026 Plan and elsewhere, residential lighting measures are not being offered in the 2024-2026 term under the ENERGY STAR® Products program, thus there is no budget, savings or participants.

New Hampshire Utilities
Docket No. DE-068

Date Request Received: August 4, 2023
Data Request No. PUC 2-003-12

Date of Orig. Response: September 22, 2023
Date of Revised Response: October 17, 2023

Request from: New Hampshire Public Utilities Commission

Request:

Subset 3 -Further Questions on the 2024-2026 Plan

Please summarize the total dollars allocated for 2024, 2025, and 2026 by end use (e.g., lighting, weatherization, etc.)

Revised Response:

Please refer to Attachment PUC 2-003-12, which summarizes the statewide total nominal incentive dollars associated with each end use for each year of the Plan.

Illustrating what was discussed in the response to Request PUC 2-001-09, Attachment PUC 2-003-12 shows only incentives provided directly to customers by end use and does not capture the payment to vendors for the costs of their services. As a result, the sum of these incentive amounts at the measure level, aggregated by end use, will not reconcile with the sub-program incentive totals on the Costs and Primary Data tab.

Please note that Unitil's B/C model inadvertently included lighting measures in the Energy Star Products program that have been discontinued and will not be offered. Customer incentives associated with these measures total $103,875 over the term. Please see the revised response to PUC 3-002-07 (Revised) for a more detailed explanation of this issue.

Original Response:

Please refer to Attachment PUC 2-003-12, which summarizes the statewide total nominal incentive dollars associated with each end use for each year of the Plan.

Illustrating what was discussed in the response to Request PUC 2-001-09, Attachment PUC 2-003-12 shows only incentives provided directly to customers by end use and does not capture the payment to vendors for the costs of their services. As a result, the sum of these incentive amounts at the measure level, aggregated by end use, will not reconcile with the sub-program incentive totals on the Costs and Primary Data tab.

New Hampshire Utilities
Docket No. DE-068

Date Request Received: August 4, 2023
Data Request No. PUC 3-002-7

Date of Orig. Response: September 22, 2023
Date of Revised Response: October 17, 2023

Request from: New Hampshire Public Utilities Commission

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?

Revised 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.

Part 2 of the original attachment accompanying this response concerning percentage and costs of benefits attributed to lighting in the proposed plan reflected values for Unitil Energy Systems, Inc. ("Unitil") that unintentionally reflected just one year of the 2024-2026 Plan rather than the term as a whole. Attachment PUC 3-002-07 (Revised) reflects the values for the three-year term for Unitil and as updated statewide.

Both the original and revised attachments concerning the second part of the question include costs and benefits in the Energy Star Products Program associated with residential lighting measures that have been discontinued and will not be offered as part of the 2024-2026 Plan. Accordingly, Unitil's planned measure mix for the 2024-2026 Plan will necessarily be different than the actual measure mix. Updating the measure mix to reallocate rebates from residential lighting measures

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to other measures will result in *de minimis* changes to portfolio-wide benefits and B/C ratios for the residential sector in particular and the portfolio as a whole.

Specifically, as shown in Attachment PUC 3-002-07 (Revised) (calculations highlighted in yellow), the lighting measures included in Unitil's plan B/C model that will no longer be offered comprise 5.06 percent of the planned budget for the Energy Star Products program, and 0.97 percent of that program's benefits (utilizing the Granite State Test). When compared to the portfolio as a whole, the lighting products being discontinued comprise 0.49 percent of the portfolio budget and just 0.09 percent of the portfolio benefits, based on the plan B/C model.

Although Unitil inadvertently included residential lighting measures in the plan B/C model measure mix, their impact is insignificant in terms of both costs, benefits and energy savings at the portfolio level and over the term. It is important to note that the B/C model is reflective of a bottom-up exercise in estimating the number of units of each measure that will be rebated in order to produce program, sector and portfolio-level savings and benefits goals. The utility's performance is appropriately measured at the portfolio level based on the Granite State Test, which considers the utility's overall achievement of annual and lifetime savings and net benefits over the term. That performance is reviewed and reported quarterly throughout the term, culminating in a term report that will compare actual performance against planned performance, at the portfolio level. Ultimately, the inclusion of these lighting measures has a *de minimis* impact on Unitil's overall plan as reflected in the revised Attachment, and actual offerings will be consistent with the Plan design as described in Exhibit 1. The customer incentives in Unitil's B/C model associated with the discontinued lighting measures will be directed to other measures within the Energy Star Products program, which will also realize energy savings and associated benefits.

Original 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.