

ORIGINAL

N.H.P.U.C. Case No. DE 10-188

Exhibit No. 51

Witness S Eckberg

Programs Set #5 NOT REMOVE FROM FILE

DE 10-188
Core Electric and Natural Gas Energy Efficiency
OCA's Responses to Staff's Data Requests –

Date Received: April 4, 2012
Request No.: Staff 5-4

Date of Response: April 18, 2012
Witness: Stephen R. Eckberg

Request: Reference page 8, lines 22-24.

- a. With respect to the provision of electricity, do you believe that implementing the proposed fuel-blind program is consistent with RSA 374-F:3, VI? Please explain.
- b. With respect to cost and benefit shifting issues, do you believe that implementing the proposed fuel-blind program is consistent with RSA 374-F:3, VI? Please explain.

Response:

- a. RSA 374-F:3 VI states:

Benefits for All Consumers. Restructuring of the electric utility industry should be implemented in a manner that benefits all consumers equitably and does not benefit one customer class to the detriment of another. Costs should not be shifted unfairly among customers. A nonbypassable and competitively neutral system benefits charge applied to the use of the distribution system may be used to fund public benefits related to the provision of electricity. Such benefits, as approved by regulators, may include, but not necessarily be limited to, programs for low-income customers, energy efficiency programs, funding for the electric utility industry's share of commission expenses pursuant to RSA 363-A, support for research and development, and investments in commercialization strategies for new and beneficial technologies.

I am not an attorney, and I do not offer the following response as a legal opinion of whether "the proposed fuel-blind program is consistent with RSA 374-F:3, VI."

Yes, I believe that the full implementation of the fuel blind HPwES is consistent with RSA 374-F:3, VI, because it would benefit all customers equitably; it would not benefit one customer class to the detriment of others; and it would not shift costs unfairly among customers.

- b. See response to Staff 5-4 a.