



NEW HAMPSHIRE LEGAL ASSISTANCE

Working for Equal Justice Since 1971

www.nhla.org

April 30, 2014

Via Email to: brandy.chambers@nh.gov; meredith.hatfield@nh.gov

Claremont Office
24 Opera House Square
Suite 206
Claremont, NH 03743
603-542-8785
1-800-562-3894
Fax: 603-542-3826

Concord Office
117 North State Street
Concord, NH 03301
603-223-9750
1-800-921-1115
Fax: 603-223-9794

Manchester Office
1361 Elm Street
Suite 307
Manchester, NH 03101
603-668-2900
1-800-562-3174
Fax: 603-622-5576

Portsmouth Office
154 High Street
Portsmouth, NH 03801
603-431-7411
1-800-334-3135
Fax: 603-431-8025

Berlin Office
1131 Main Street
Berlin, NH 03570
603-752-1102
1-800-698-8969
Fax: 603-752-2248

Administration
117 North State Street
Concord, NH 03301
603-224-4107
Fax: 603-224-2053

TTY: 1-800-735-2864

Meredith A. Hatfield
Director, NH Office of Energy and Planning
Governor Hugh J. Gallen State Office Park
Johnson Hall 107 Pleasant Street
Concord, NH 03301

RE: NHLA and The Way Home Comments on State Energy Plan

Dear Director Hatfield, and Members of the State Energy Advisory Council:

Please accept and consider these comments on behalf of the New Hampshire Legal Assistance (NHLA) and The Way Home.

NHLA is a statewide non-profit law firm. Our attorneys and paralegals represent low-income and elderly clients in civil cases impacting basic needs, such as housing, food, veterans benefits, safety from domestic violence, access to basic utilities, healthcare and unemployment insurance. NHLA routinely represents the The Way Home before the New Hampshire Public Utilities Commission and the Legislature on low-income energy efficiency related matters.

The Way Home is a non-profit dedicated to helping low-income households obtain and sustain safe, affordable housing throughout the state of New Hampshire. Since 1988, The Way Home has assisted more than 20,000 homeless and high risk families, individuals, veterans and special needs clients with their housing needs.

I. The Low-Income Energy Efficiency Need:

In 2012, there were an estimated 89,000 low-income homes in New Hampshire that have yet to participate in the low-income energy efficiency program in New Hampshire. *See* EESE Board Synthesis of VEIC Report on Low-Income Energy Efficiency, Nov. 30, 2012, p. 6. There is a long waiting list across the state for these services.

Low-income households are unable to do this on their own, many are working poor, or on fixed incomes, including some who are seniors, and they face the persistent market barrier to participation in energy efficiency because of lack of disposable/up-front

income. Moreover, on-bill and other financing mechanisms have not traditionally been a viable option for low-income households. Low-income households need financing to support the Home Energy Assistance (HEA) program of CORE/NH Saves, which works in conjunction with the federal Weatherization Assistance Program, in order to help support the reduction of low-income energy burdens.

II. The Low-Income Energy Efficiency Benefits:

The reduction in energy burden for low-income households is not the only benefit of the low-income energy efficiency program. There are significant nonenergy savings resulting from the low-income energy efficiency program, including reduced disconnections, increased housing affordability, lower reliance on municipal welfare assistance, and a significant increase in economic benefits of sustaining the weatherization workforce as well as increased economic activity and spending resulting from reduced bills. *See e.g.* VEIC Independent Study of Energy Policy Issues, Final Report; 2012, p. 6-1; *see also* Nonenergy Benefits From the Weatherization Assistance Program: A Summary of Findings from the Recent Literature, Oakridge National Laboratory; 2002, pp. 20-23; *see also* New Hampshire Energy Efficiency Working Group Report, Docket No. DR 96-150; July 6, 1999, pp. A42-A51. Money from energy savings of low-income homes is not put in savings account; it is spent on much needed necessities for low-income families – like rent, medicine, personal maintenance, and food – and much of it is spent right here in the local economy.

III. NHLA and The Way Home Suggestions for the State Energy Plan:

NHLA and The Way Home provide the following suggestions for consideration for inclusion in the State Energy Plan:

- 1.) *Expand Upon Existing CORE/NH Saves Energy Efficiency Programs:* The CORE/NH Saves energy efficiency programs are award winning, highly successful and highly effective, including the low-income HEA program. NHLA and The Way Home suggest that the State Energy Plan include a recommendation that: a.) The New Hampshire Public Utilities Commission increase funding through the systems-benefits charge to support all CORE/NH Saves programs, and b.) The New Hampshire Legislature increase funding for CORE/NH Saves by increasing the amount from the Regional Greenhouse Gas Initiative that is provided to support all CORE/NH Saves programs. NHLA and The Way Home recommend an “all programs” approach as an equitable way to increase funding to all sectors, including the HEA program.
- 2.) *Form a Study Commission to Consider the Development and Deployment of an CORE/NH Saves Model to “All-Fuels”:* While the HEA program is largely fuel neutral, there are still tens of thousands of low-income households, and many more middle income households who heat with heating oil, kerosene and/or propane who are not likely to be reached by the existing programs. NHLA and The Way Home suggest the State Energy Plan include a

recommendation to create a study commission with relevant stakeholders in order to evaluate whether or not a CORE/NH Saves model can be developed – where the private sector energy suppliers help provide the programs and also receive benefits/incentives. This could include a small per unit usage charge that supports energy efficiency programs for all sectors, including low-income households, as well as supporting a supplemental low-income fuel assistance program. Ongoing cuts in the federal Low Income Home Energy Assistance Program (LIHEAP) program call for a State Energy Plan that considers state-based solutions to helping low-income Granite Staters make it through the winter, including many seniors on fixed incomes. An all fuels approach is a state-based solution which should be considered.

- 3.) *Set a Goal for Low-Income Homes:* With over 80,000 low-income homes yet to receive energy efficiency services, NHLA and The Way Home suggest the State Energy Plan include a goal of addressing this need by covering 30,000 low-income homes over the next ten (10) years, or 3,000 per year. This is over one-third of the low-income housing stock remaining that need services. An increase in funding would be needed in order to meet this goal.

NHLA and The Way Home sincerely appreciate all your time on this. Thank you for considering these comments as you work on completing this important task.

Respectfully submitted,



Daniel Feltes
Director, Housing Justice Project

cc: Dianne Pitts, The Way Home