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Director Meredith Hatfield  
NH Office of Energy and Planning  
Concord, NH 03301

Dear Director Hatfield and Members of the Energy Advisory Council:

Thanks for the opportunity to submit comments regarding the draft 10 Year, NH State Energy Strategy. Our Northeast Region office of GDS Associates has been actively engaged in developing, analyzing and implementing state energy policy for clients throughout the region and nationwide since 1999. We were pleased to see a lot of excellent concepts included within the current draft State Energy Strategy report. However, we share a common concern among many parties in New Hampshire that believe the report does not go far enough in identifying and recommending specific targets/goals to help guide subsequent policy and implementation activities. As such, we respectfully suggest the following:

Please consider including a goal within the state energy strategy document to reduce the export of our state's energy dollars from 66% (nearly \$4 billion annually)<sup>1</sup>, to 50% by 2023, retaining over \$1 billion of economic wealth each year in New Hampshire. This goal can be reached by pursuing the following three strategies:

1. Significantly ramp up energy efficiency and conservation through system wide efficiency investments (customer-side and utility/supplier-side), to reduce overall energy use – following the six strategies detailed within the recently completed VEIC/GDS/Jeffrey Taylor final report entitled “Increasing Energy Efficiency In New Hampshire, Realizing Our Potential” (dated November 15, 2013) including:
  - a. State & Local Governments Lead-by-Example
  - b. Expand & Enhance the CORE Programs
  - c. Enable Behind-the-Meter Investments
  - d. Implement Roadmap to 90% Code Compliance
  - e. Track, Report, Benchmark & Promote Energy Efficiency
  - f. Accelerate & Scale-up Private Investment Activity;
2. Replace imported fossil fuel use with locally produced renewable energy, with an emphasis on:
  - a. Distributed generation
  - b. Utility-scale generation
  - c. Thermal and electric fuel switching for heating, cooling, and transportation needs; and,
3. Unleash the private market to finance the infrastructure by minimizing policy risk, sending clear market signals, and better leveraging our minimal available public funds.

Thanks for your consideration,

Scott M. Albert, Principal & Northeast Region Manager

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<sup>1</sup> Vermont Energy Investment Corporation et al. September 30, 2011. [Independent Study of Energy Policy Issues](#).