

July 25, 2014

Jo Anne Carr, D.L.P.
354 Summer Street
Peterborough, NH 03458

Meredith Hatfield, Director
New Hampshire Office of Energy and Planning
Johnson Hall, 107 Pleasant Street
Concord, NH 03301

Dear Ms. Hatfield,

Thank you for the opportunity to comment on the draft State Energy Strategy. I was able to participate in several of the Advisory Council meetings in Concord and the public meeting in Nashua as an interested community planner. I am impressed with the comprehensive approach and inclusive nature of the proceedings.

SB 191 presents an opportunity to clarify the purpose of a State Energy Strategy and define a forward looking policy for energy security and development. Therefore I would like to emphasize at the outset, that this strategy must define specific goals and metrics. NH has taken a pragmatic approach over the years in ensuring energy security and diversity, promoting economic development and environmental protections, piecing together the framework for this project. Furthermore, the NH legislature, and importantly, government administrators have incrementally adopted policies and legislation to move the state toward a reduced carbon footprint and energy security. However, the absence of a comprehensive, enforceable energy policy has left gaps and inconsistencies in statutes and administrative rules, and resulted in a policy vacuum. My concern is the absence of a reference in this Strategy to the policy goal of greenhouse gas reductions of RSA 362-F (renewable portfolio standards) and RSA 125-O (regional greenhouse gas initiative), particularly as the funding for the development of this plan derived from these programs.

The Public Utilities Commission and the Office of Energy and Planning confirm a proactive approach to plan for grid security, storage and energy diversity. In a recent State Energy Council Meeting, discussion revolved around the importance of distributed generation and implementing new technologies for net metering to provide an open feedback loop to utilities to manage demand, mitigate intermittency issues and minimizing line losses. What was particularly striking at this meeting, comprised of agency personnel, a bipartisan representation of the House and Senate, and industry and utility interests, was the apparent consensus that the energy strategy should be based on market incentives and metrics be performance based. Innovation and new technologies will derive from industry and energy entrepreneurs creating dynamic efficiencies in production and distribution.

Enacting a State Energy Strategy that sets forth a clear policy direction, sets enforceable performance standards, and is inclusive of the myriad energy statutes, will ensure a more coherent approach to GHG reductions and secure NH's energy future. Also important is

streamlining the regulatory process, updating the RPS to address regional REC and ACP pricing, and formalizing energy efficiency and alternative energy programs. Funding for EESE should be protected through the proceeds from the RGGI and ACP. I believe many of your commenters have provided specific recommendations elaborating on the above thoughts.

NH has a history of small but important steps beginning in the 1990's that laid the foundation for energy planning and climate change preparedness, placing NH ahead of many other states, and the nation. I hope we can build on those successes with this Strategy to keep NH on this positive trajectory for energy independence and economic resiliency.

Best regards,

Jo Anne Carr

Jo Anne Carr
Director of Planning and Economic Development
Town of Jaffrey