

October 16, 2017

OSI Public Comments Berlin Event

- Laura Richardson –Benton Flats, NH
 - Evolving plan- new tech
 - Building codes from 2009 and now are connected
 - Should not take out certain/single code because it could jeopardize other codes
 - Might make sense politically but removing codes aren't good
 - Not drop any energy codes
 - Wants grid modernization –recommend ruling into order from PUC
 - Energy efficiency
 - Greenhouse gas initiative to reduce carbon
 - Want to decouple the utilities
 - Electric charging stations
- Gil Richardson –Benton Flats, NH
 - Energy and consultant
 - Standards for the energy code in NH housing is bad
 - No one follows through on energy
 - Side story
 - Woman lives in Conway, builder cuts corners on addition to the house. Gil got him to pay the difference after inspecting the addition and seeing it was not up to energy code
 - Energy codes need to be promoted/ enforced with regular code
 - Make the could more standard and enforced
- Bob Tortorice –Franconia, NH
 - 2009 building codes are still in effect wants the 2015 codes to be used
 - BBP and HBA turned down new energy code because too expensive
 - Should have equal enforcement of the code
 - Rebate program → PUC doesn't give them in Littleton
 - NH CO-OP and other Utilities
 - Consumer does not know about energy
 - Short sight view to pay for energy
 - Geothermal/solar
 - Builders should have above state code using the energy code as well
 - Look at resources outside the state

Open comment

- New technology better
- New construction better
- Energy star certified would be better no more cost to prevent more problem

- HBA licensing shot down because of cost
- State just wants the money
- Improve CAPS section 8 housing
- People have to work together on code consistence
- Third party auditor needs to come on from the building Performance Institute
- Heighten inspections
- Geothermal energy
- Air souring heat pump
- Consumer education lacking
- Meet with reps/senate to get 2015 energy code on the books and adopted codes as written
- Train the people to know what is happening and to do that, a consistency needs to be given to businesses and builders so they have time to learn and follow the codes
- The rebate changes every year which is not a nice thing
- Energy star certified is more efficient and reduces cost

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Jared Chicoine, Director
NH Office of Strategic Initiatives
Governor Hugh J. Gallen State Office Park
Johnson Hall, 3rd Floor – 107 Pleasant Street
Concord, NH 03301

Dear Director Chicoine,

Thank you for this opportunity to share comments regarding updates to the 2014 Ten-Year Strategic Energy Plan for New Hampshire. I applaud your efforts at revisiting this guidance document as New Hampshire has made some progress in achieving its goals and yet still has numerous strides to make. For almost twenty years, I have been very interested and involved in renewable energy and energy efficiency from both public policy and project implementation perspectives.

The top priority that New Hampshire should pursue in the near-term is **Updating Building Codes**, including and especially the Energy Code. Codes and standards are updated on three-year cycles by an international consortium of diverse stakeholders. Even though 2017 is almost over, New Hampshire is *still using the 2009 family of codes*. That means that new construction is using old technology, including techniques and systems that have been proven to be inefficient, ineffective, costly, and in some cases harmful. Buildings constructed to last fifty or one hundred years are outdated and have problems even before they are occupied. New Hampshire has delayed adoption of updated codes for too long with the result that changes to catch up to modern guidance will require significant effort, all of which will get more and more difficult the longer we procrastinate. I disagree with a concept currently being floated in the legislature to update codes but keep the International Energy Conservation Code at its current 2009 level. The codes are designed to be integrated with each other. Disregarding components of one code will lead to problems with indoor air quality and create ice dams, plus they will waste energy. Updated building codes – preferably without any diluting amendments – should be prioritized in the next legislative session, with trainings for builders, inspectors, and others available this spring. Here is a terrific roadmap for next steps: <http://www.nhenergycode.com/live/index.php?go=roadmap>.

New Hampshire has made some important progress on goals and steps highlighted in the Strategy. Recent achievements include creating a framework for setting an energy-efficiency goal and mapping out a plan to modernize the electricity grid in New Hampshire. Specifically:

- The **Energy Efficiency Resource Standard (EERS)** creates a framework to meet energy-efficiency goals for customers of the electric and natural gas utilities. Making our buildings more energy efficient improves their value, productivity, durability, and comfort while reducing monthly energy bills. When those energy and cost savings are aggregated they temper energy-use spikes

which lead to dramatic costs to everyone, and keep those energy dollars in the local economy, not sent away. Efficiency is a proven good investment and should continue to be prioritized. Expanding the energy-efficiency programs long-offered by the electric and natural gas utilities to meet goals rather than expend budgeted funds simply makes sense in this frugal state.

- Last year, the PUC opened an investigational docket regarding **Grid Modernization** and worked with numerous qualified stakeholders focused on developing realistic, cost-effective, and prioritized updates to New Hampshire's portion of the electric grid. I understand that this week the PUC is expected to respond to the Plan developed by that group with an Order to pursue next steps, hopefully including modernizing rates, incentives, and infrastructure, while integrating renewable energy and distributed energy. Everyone relies on the grid in a variety of ways, and as our expectations of the grid evolve, it is important to have a system that can provide energy appropriately. Attached to this letter is an article from the Rocky Mountain Institute about baseload power that provides an excellent argument about the grid's future.

The State Energy Strategy also emphasized improvements to the following policies and programs:

- Stabilize and strengthen the **Renewable Portfolio Standard, Regional Greenhouse Gas Initiative, and incentives**. These market-signal programs are vital to realize the long-term goal of a resilient and economically powerful future. I heartily agree.
- I would also very much like to see the near-term roll-out of **Time-Of-Use Metering**, which will encourage all ratepayers to use their electricity more wisely and reduce strains on the grid.
- **Decoupling the Utilities** is a worthy policy too, albeit complicated and sometimes misunderstood. Decoupling is jargon for disconnecting energy sales from energy profits and rewarding utilities for encouraging their customers to reduce their energy. This policy has consistently proven to be cost-effective, improving energy-efficiency program outcomes and long-term cost savings.
- Finally, I would like the State to develop and implement a strategic plan for near-term expansion of **Electric Vehicle Charging Stations** and incentives to reduce "range anxiety." Such an investment will help us revolutionize transportation options, attracting millennials to live and tourists to visit, not to mention significant health and environment benefits – and cost savings.

More than one hundred members of the public and stakeholders provided their perspectives and comments on the 2014 Ten-Year State Energy Strategy, as well as its bi-partisan advisory committee. It is a terrific roadmap with a realistic and aspirational vision. Revisiting the Strategy is a good step because new technologies and techniques are available, and expectations are changing. My hope and expectation is that these comments will help inform evolving priorities and initiatives. Please do not dilute or eliminate recommendations from this important document, rather I ask that you heed them and prioritize next steps. Thank you for this opportunity to share my comments.

Sincerely,



Laura Richardson