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Submitted electronically via: [stakeholdercomments@nhsaves.com](mailto:stakeholdercomments@nhsaves.com)

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**Re: 2027-2029 New Hampshire Statewide Energy Efficiency Plan**

We thank the NHSaves utilities for the opportunity to provide input on the draft changes for the NHSaves programs for the 2027-2029 cycle. We commend the utilities for what they have done so far in conducting extensive stakeholder engagement discussions and ensuring that this feedback is incorporated into the next NHSaves plan. The next cycle will build on the success of previous years, where energy efficiency investments led to lower bills for residents and businesses, healthier homes and buildings, local job creation, and least-cost resources to the energy system.

Northeast Energy Efficiency Partnerships (NEEP), Keene Housing, NH ASHRAE, Community Action Partnership of Hillsborough and Rockingham Counties, Dig Energy, Conservation Law Foundation, and NH Community Loan Fund are a group of organizations with broad missions to serve the public interest and advance energy efficiency for its multiple benefits to consumers, the environment, and the economy. We hope that these comments will help New Hampshire continue its success in energy efficiency and provide insight to help improve the program as the NHSaves partners prepare to launch this next cycle.

We make recommendations in the following topic areas to support energy efficiency in New Hampshire through the 2027-2029 cycle:

- Supporting and enhancing existing program offerings
  - Expand on-bill financing to advance affordability
  - Amend benefit-cost analysis to value energy efficiency more accurately
  - Scale up active demand response programs to reduce bills and peak usage
  - Coordinate weatherization and electrification programs for improved participant outcomes
  - Pilot pay-for-performance options to achieve greater savings
  - Expand heat pump incentives to increase electrification opportunities
- Exploring new options in program offerings
  - Develop a contractor network to benefit contractors and consumers
  - Establish reporting for deferrals to tackle problems strategically
  - Create an energy coach or turnkey program to help customers
  - Explore establishment of a Total Systems Benefit goal to capture all value



## Supporting and enhancing existing program offerings

### *Expand on-bill financing to advance affordability*

#### **Recommendation: Help homeowners unlock additional funding by expanding on-bill financing.**

Energy efficiency improvements are increasingly critical with the ongoing affordability crisis. On-bill financing for energy efficiency investments can help homeowners access improvements they might otherwise delay or forgo due to upfront costs. By allowing repayment through a utility bill, it aligns financing with the energy savings generated, often resulting in little to no net increase in monthly expenses. This structure can also make projects more attractive to third-party lenders or unlock additional incentives, since repayment is streamlined and tied to the property's energy usage. As a result, homeowners might bundle insulation, electrification with heat pumps, or upgrades to high-efficiency appliances into a single process to decrease energy burden.

Expansion and marketing of current offerings would make energy efficiency improvements more attainable, particularly for residential customers that do not qualify for low-income programs. The utilities might consider aligning their financing options statewide and collaborating on marketing these options to encourage greater participation. Marketing might include easy-to-find information on the NHSaves website as well as coordinated messaging through contractor and lender networks. To track progress, the utilities might also consider setting on-bill financing participation goals in their program plans.

### *Amend benefit-cost analysis to value energy efficiency more accurately*

#### **Recommendation: Reduce the discount rate.**

Cost-benefit tests are used to assess the cost-effectiveness of various energy resources such as energy efficiency, pipe and wire infrastructure, and other distributed energy resources to ensure ratepayer investments result in benefits for customers, utility systems, and society. Cost-benefit analyses are an important step in evaluating energy efficiency programs because they ensure that ratepayer dollars provide benefits for customers, the utility system, and society at large.

The discount rate is a percentage applied in the cost-benefit analysis that measures how financial investments will be valued in the future. A lower discount rate reflects an investment that will provide the same or more benefits to future generations. We believe lowering the discount rate better reflects the long-term benefits of energy efficiency investments.

The Granite State Test, as approved in [December 2019](#), does not specify a discount rate. Therefore, we encourage the utilities to adopt a low discount rate for energy efficiency investments. We support the utilities' proposed plan to update the discount rate from the current real discount rate of 2.78% to a lowered estimate of 2.25%.



**Recommendation: Exclude low-income programs from overall portfolio benefit cost analysis.**

We suggest that the utilities not count low-income programs' savings and spendings toward overall program benefit-cost ratios. Offerings in these programs are intended to improve affordability for those who need it most, whose barriers will naturally cost more to overcome than for market rate customers. As an example, in Pennsylvania electric utilities' energy efficiency portfolios, low-income programs [do not count](#) toward the benefit-cost ratio that the portfolio as a whole must meet.

While we encourage utilities to continue measuring and reporting costs and benefits of low-income programs, the purpose of the programs is to provide service and access to customers with the greatest energy burdens. These programs should not be counted toward overall cost-benefit in the same way as market-rate programs.

***Scale up active demand response programs to reduce bills and peak usage***

**Recommendation: Maintain Home Energy Reports.**

Behavioral demand response (BDR) or peak-time rebates can consistently reduce peak usage. This is especially important in the ongoing affordability crisis because lowering peak demand by shifting energy usage can create a more reliable and resilient electric grid, alleviating some of the need for grid maintenance and build-out costs.

Offering Home Energy Reports can help with energy affordability and alert consumers of high bills. These proactive alerts warn customers when they are trending towards higher usage than normal. High usage alerts reduce service costs by reducing calls to the call center and ensure less bill shock. NEEP encourages New Hampshire to maintain the Home Energy Reports program to ensure consistency in program offerings and continue investment in a cost-effective program that enables tailored customer engagement.

We commend Unital's move to enhance its existing behavior program using advanced metering infrastructure (AMI) data to target customers with the highest opportunity for savings.

Behavioral programs work best with AMI, though there have been non-AMI versions of behavioral demand response programs being deployed in [Massachusetts](#) (as temporary offerings until customers are transitioned to AMI). While we encourage the utilities to consider statewide installation of AMI, we understand that expanding AMI would fall under other dockets, and may not be directly actionable within the scope of NHSaves programs.

**Recommendation: Scale up funding for ADR programs and allow residential customers to participate and help to lower peak usage.**

Active demand response (ADR) programs provide incentives and rebates for customers to participate in energy usage-shifting programs. ADR programs in New Hampshire are limited in size, and most of the budget goes to the C&I programs (see [Table 5-4](#)).

Examples of successful active demand response programs are demonstrated by Rhode Island Energy, which operates the [ConnectedSolutions](#) program that compensates residents for granting the utility control over their thermostats, EV charging times, and home battery storage, and Maryland's BGE, which offers a demand



response program that enables customers to earn [Connected Rewards](#) by enrolling smart thermostats and allowing utility-controlled temperature adjustments during peak periods.

While the utilities run [ConnectedSolutions](#) in New Hampshire, they might consider expanding the scope and funding of this program and aiming for increased residential participation. ConnectedSolutions is currently available to residential electric customers of Eversource, Liberty, and Unitil with smart thermostats and central AC or central heat pumps. We commend NHEC's move to offer ConnectedSolutions this cycle for the first time.

### ***Coordinate weatherization and electrification programs for improved participant outcomes***

**Recommendation: Cross-promote weatherization and electrification measures more strongly to improve customer and grid outcomes.**

Pairing weatherization and heat pumps can deliver better outcomes, including reducing household energy bills, mitigating and delaying winter peaking and grid impacts, and improving customer comfort, satisfaction, and resilience.

There are many ways to co-promote weatherization and electrification. With co-installation, a program requires customers to install both measures to qualify for incentives. With a bonus incentive, a program provides extra incentives for one measure based on adoption of the other. This can be structured in either direction (i.e., heat pump incentives with higher incentives if the customer also weatherizes, or vice versa). With information sharing, program providers offer information and encouragement to install measures in conjunction. Program administrators do not provide extra incentives, rather usually linking information on accessing all types of measures on program websites.

We support the utilities' proposed consideration of expanding their co-promotion and coordination between heat pump, HVAC, and weatherization programs. We applaud NHEC's [weatherization and heat pump co-promotion incentive](#), and urge the remaining utilities to consider offering co-promotion pathways through bonus incentives and information sharing between weatherization and electrification programs.

### ***Pilot pay-for-performance options to achieve greater savings***

**Recommendation: Pilot pay-for-performance and measured savings options to achieve greater savings and protect ratepayers.**

Pay-for-performance models, also known as [measured savings](#), reduce risk for regulators, utilities, and ratepayers by linking incentives to verified energy savings rather than projections. These models have been in use for more than [25 years](#). Savings are measured over a certain time period following the date of the energy efficiency intervention; the model allows the customer and/or aggregator to accrue incentives on an ongoing basis. This measured-savings approach allows for greater flexibility in program design while ensuring that outcomes are achieved. It also reduces reliance on lengthy evaluation studies that can delay pilot programs. By incorporating measurement into implementation, projects can proceed more efficiently. At the same time,



underperforming projects receive reduced or no incentives. This ensures that ratepayer funds are directed only to projects that deliver demonstrated benefits.

### ***Expand heat pump incentives to increase electrification opportunities***

**Recommendation: Incentivize ground source heat pumps at the same level as air source heat pumps.**

Ground source heat pumps (GSHPs) are among the most efficient electrification technologies available, delivering 300-500% efficiency, significant lifecycle emissions reductions, and meaningful grid benefits through peak demand reduction. These benefits make GSHPs an important measure for improving affordability, as their high efficiency translates into lower long-term energy costs for both residential and commercial & industrial (C&I) customers.

However, the current NHSaves program only consistently supports air source heat pump (ASHP) adoption, while GSHPs are often treated as custom projects with higher participation barriers. This disincentivizes GSHP adoption, even though GSHPs perform very well as efficient electrification solutions in climates like New Hampshire.

To better align incentives with system performance, long-term cost savings, and grid impact, GSHPs should receive the same incentives as ASHPs across residential and C&I programs, including equivalent \$/ton incentive levels and eligibility for inclusion in midstream distributor programs. These improvements would reduce participation barriers and support broader adoption of high-efficiency electrification technologies across residential and commercial markets in the state.

### **Exploring new options in program offerings**

#### ***Develop a contractor network to benefit contractors and consumers***

**Recommendation: Stand up a limited contractor network to explore benefits to workforce development and program delivery.**

Qualified contractor networks are a critical tool to deliver successful program outcomes and to achieve market transformation. These networks of well-trained, high-performing contractors are increasingly important as state and utility energy efficiency programs evolve to meet multiple policy objectives including energy affordability, equity, climate mitigation and adaptation, and economic development. A qualified contractor network benefits consumers and contractors by spreading and standardizing best practices, providing regular training, and allowing customers to easily find trusted contractors.

A qualified contractor network can serve as a helpful resource for customers and contractors alike. Contractors can receive materials for marketing, technical support, trainings on codes and available rebates. The network also addresses the need to communicate contractor barriers to growth to policymakers and funders, and any underlying policy barriers to contractors.



When launched in 2015, Vermont's [Efficiency Excellence Network](#) included only 30 contractors. New Hampshire could consider establishing a similarly-sized pilot network. Eventually, the NHSaves utilities could consider setting up a dedicated heat pump installer network for dissemination of best practices and to keep contractors familiar with installing and servicing the newest available technologies.

New Hampshire could partner with distributors and manufacturers to promote heat pump trainings tailored to the state. The [New England Heat Pump Accelerator](#) is a new multi-state initiative that will support regional workforce development, including collaboration with New Hampshire-based distributors and manufacturers. NHSaves utilities could align with the Accelerator's efforts to help develop and share best practices for heat pump sizing and installation.

As a first step toward developing a state-specific contractor network, the NHSaves utilities could consider setting up an online portal with virtual trainings, as well as a database of trainings that distributors offer within the state. The utilities might then consider publicizing a database of qualified contractors, easily searchable by customers, similar to those in [Maine](#) and [Vermont](#).

### ***Establish reporting for deferrals to tackle problems strategically***

#### **Recommendation: Report deferrals in future annual reports.**

We know deferrals are an issue in New Hampshire, but there is limited information available on the scale or details of the issue (e.g., are most deferrals resulting from mold, asbestos, vermiculite, or other issues? How many in each category?). The answers will have a strong effect on planning for tackling deferrals.

States can mandate program administrators to report deferral metrics publicly and use this information to inform the next suite of programs, but administrators can also publish their reports without any legislation or regulation. The NHSaves utilities could consider reporting deferral metrics in an easily understandable and accessible manner, including clear, readable tables, graphs, and charts, to all members of the public. Public reporting allows for transparency and accountability in program implementation. The utilities might refer to the [Mass Save data platform](#) as an example of maintaining program transparency.

The utilities might also consider conducting a detailed baselining study of the building stock in the state, though we acknowledge this might be outside the scope of the NHSaves programs.

### ***Create an energy coach or turnkey program to help customers***

#### **Recommendation: Establish a single touch point for customers to access all eligible incentives and programs.**

Building upgrades can be expensive and complicated and can deter customers if they are unable to navigate the system or unsure of how to access the rebates and other incentives available to them. Customers should have a streamlined way to implement whole-building upgrades.

Establishing a single touch point so that customers can have access to information on available programs no matter where they live in the state can help with marketing and education. One website can also provide links to



utility programs, so that it is easier for customers to find and identify what rebates they are eligible for. Similar states offer such a service, such as [Efficiency Vermont's website](#). It will also be helpful to collect data on website engagement and interaction to ensure that customers are able to navigate it and highlight any areas of improvement. It will be important to coordinate this tool with existing state efforts, such as the new [Energy Efficiency Hub](#) being established by NH Department of Energy.

We support the utilities' proposed plan change to procure C&I turnkey vendors to facilitate customer participation. We recommend the utilities consider a similar approach for the residential sector.

While we commend the investigation of potential deployment of a Retail Products Platform suggested by the utilities, we suggest the utilities proceed with development and implementation of a hub approach for customers to access information and programs.

To further streamline access to resources intended for low-income customers, the utilities could consider coordinating application processes with other low-income programs such as WAP, LIHEAP, and SNAP to create a process where low-income customers would only have to fill out one application to receive all eligible benefits.

Additionally, programs that offer various building upgrades should coordinate with each other to ease customers' administrative burden and ensure that customers succeed in complete, whole-home upgrades without getting frustrated and quitting. Improved alignment can be accomplished through more coordinated contractor training pathways and streamlining customer applications and experiences across programs.

**Recommendation: Establish a statewide energy coach program.**

An energy coach program, tactfully created over time with robust stakeholder engagement, can lessen the burden on participation by empowering customers to know more about the rebates available to them, connecting customers to contractors, and helping to streamline the rebate process. An energy coach is a community member, often a volunteer, who works one-on-one with homeowners to provide free education and guidance on complex energy upgrades. Energy coaches help reduce the complexity of purchasing a heat pump or heat pump water heater by talking through priorities, system design, finances, installer communication, and more. The coach acts as a third-party resource, creating a welcoming environment for clients to ask questions and learn before they approach installers.

While coaches can work independently, they are most effective when operating as part of a program. These programs often include an educational website and one-on-one coaching services, becoming a trusted hub for attracting clients and promoting events. Coaches participating in the program benefit from streamlined tools, shared resources, and peer support. In Massachusetts, [14 municipalities](#) have energy coaching programs to help meet their clean energy goals. [The HeatSmart Alliance](#), a Massachusetts nonprofit, acts as an energy coaching hub, providing coaching services to towns without their own programs. Energy coaching is also gaining traction beyond Massachusetts, including [Maine](#), [Connecticut](#), [New York](#), and [Colorado](#).

While we support the utilities' proposed targeted outreach through the ENERGY STAR Homes and Home Performance Programs, there is an opportunity to set up more robust technical assistance for the entire home



improvement process. New Hampshire already has the [Monadnock Sustainability Hub](#), which offers free energy coaching for residents of the Monadnock region; we recommend the utilities consider offering a statewide version.

***Explore establishment of a Total Systems Benefit goal to capture all value***

**Recommendation: Use the Granite State Test to set a Total Systems Benefit goal, capturing hourly and locational value.**

Energy efficiency needs to be valued not just on how much is saved, but when it is saved. Most grid costs are incurred at concentrated times of day and year. Utilities can achieve more grid benefits with the same total energy savings amounts by accounting for hourly and locational value.

As it stands, the Granite State Test can already be used to set goals, since this system of valuation is agreed upon. We recommend using the Granite State Test to set a [Total Systems Benefit](#) (TSB) goal, for two reasons. First, the TSB would provide a more accurate measure of the benefits of efficiency investments. This could lead utilities to incentivize controls equipment to hit peak periods, zeroing in on lowering usage at specific times of day and year. Second, a Total Systems Benefit goal would serve as a fuel-neutral goal to supplement New Hampshire’s existing electricity and gas savings goals. This would allow the utilities to capture the energy-saving impacts of decreased use of delivered fuels, which are currently not reflected in existing goals.

Additionally, we encourage the utilities with AMI to use AMI data to further the impact of peak shaving measures, though we acknowledge that AMI expansion is outside the scope of NHSaves programs.

**Conclusion**

We thank the New Hampshire NHSaves Utilities for the opportunity to provide comments. These comments are intended to support the work currently underway with the 2027-2029 Energy Efficiency Plan and we appreciate the opportunity to provide input. In addition to these comments, NEEP is available to provide additional technical assistance to the utilities on energy efficiency policies and programs. If you have questions or would like additional information, please reach out to Erin Cosgrove, [ecosgrove@neep.org](mailto:ecosgrove@neep.org).

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