



October 23, 2013

Via electronic mail

Karla McManus
New Hampshire Department of Environmental Services
29 Hazen Drive. P.O Box 95
Concord, NH 03302-0095

Re: Amendments to New Hampshire CO2 Budget Trading Program, CO2 Offset Projects, and CO2 Allowance Auction Program, RSA 125-O: 20-29

Dear Ms. McManus:

On behalf of Northeast Energy Efficiency Partnerships (NEEP) I am pleased to submit comments on the Department of Environmental Services proposed amendments to New Hampshire's CO2 Budget Trading Program, CO2 Offset Projects, and CO2 Allowance Auction Program.¹

NEEP is a regional non-profit whose mission is to accelerate energy efficiency in the building sector through public policy, program strategies and education in the Northeast and Mid-Atlantic states. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

We provide comment today in support of the proposed amendments to New Hampshire's CO2 Budget Trading Program, CO2 Offset Projects, and CO2 Allowance Auction Program, which will implement the Regional Greenhouse Gas Initiative (RGGI) Updated Model Rule.² The changes, the result of last year's comprehensive RGGI program review conducted by all participating states, will revise New Hampshire's 2014 CO2 base budget and provide for reductions to the budget of 2.5 percent each year through 2020.³ Collectively, the updated model rule will significantly lower the carbon dioxide emissions in the Northeast and Mid-Atlantic region.

Evidence shows that the investment of RGGI proceeds in energy efficiency is a win-win, as it provides a significant economic benefit for New Hampshire residents and businesses. Research by the Analysis Group found that investments in energy efficiency through RGGI have had net

¹ These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners.

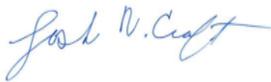
² Updated Model Rule for 2013, Regional Greenhouse Gas Initiative, http://www.rggi.org/docs/ProgramReview/_FinalProgramReviewMaterials/Model_Rule_FINAL.pdf

³ Proposed Amendments to New Hampshire Revised Statutes Annotated (RSA) 125-O: 20-29, available at <http://des.nh.gov/organization/commissioner/legal/rulemaking/index.htm>.

positive economic impacts for ratepayers in the Northeast and Mid-Atlantic region.⁴ As a result of these rule changes, New Hampshire can expect to see gains of \$202 million in net value to the state's economy as a result of the new investments in their energy efficiency programs during the current RGGI compliance period.⁵

Thank you for the opportunity to comment in this important proceeding and for your work to implement the updated RGGI model rule. These amendments will help New Hampshire building on its energy efficiency program and offer cleaner and more affordable energy choices for its customers. Should you have any questions regarding this or other matters on energy efficiency in the Northeast, please do not hesitate to reach out to me at jcraft@neep.org or (781) 860-9177 x109.

Sincerely,



Josh Craft
Manager of Public Policy Analysis
Northeast Energy Efficiency Partnerships (NEEP)

⁴ See Paul Hibbard, et al., Analysis Group, "The Economic Impacts of the Regional Greenhouse Gas Initiative on Ten Northeast and Mid-Atlantic States," November 15, 2011, p.33, http://www.analysisgroup.com/uploadedFiles/Publishing/Articles/Economic_Impact_RGGI_Report.pdf.

⁵ Environment Northeast, RGGI Economic Benefits, June 2013, http://www.environmentne.org/public/resources/ENE_RGGI_Economic_Benefits_20130607.pdf.