



The State of New Hampshire
Department of Environmental Services



Thomas S. Burack, Commissioner

February 5, 2015

The Honorable James Belanger, Chairman
House Municipal and County Government Committee
Legislative Office Building, Room 301
Concord, New Hampshire 03301

Re: House Bill 205, relative to clean energy districts.

Dear Chairman Belanger and Members of the Committee:

Thank you for the opportunity to comment on behalf of the Department of Environmental Services (DES) relative to House Bill 205, which seeks to amend the definition of “property owner” pursuant to RSA 53-F:1 to include only owners that are an “*individual or nonprofit organization*”. The proposed amendment undermines the intent of RSA 53-F, which is to enable municipalities to assist commercial property owners, including public or private corporations, in financing energy efficiency and clean energy projects. Therefore, DES opposes this legislation.

In RSA 53-F:3 (*Energy Efficiency And Clean Energy Districts*) the General Court established the authority of municipalities to create energy efficiency and clean energy districts in order to provide financing to commercial property owners for energy conservation and efficiency and clean energy improvements in order to “*achieve the public benefits of protecting the economic and social well-being by reducing energy costs in the community and risks to the community associated with future escalation in energy prices, and addressing the threat of global climate change...*” provided that the municipality finds that the projects financed “*will serve the public purposes as set forth in this chapter and not primarily be for the benefit of private persons or uses ...*”.

Numerous studies and reports, including the 2009 Climate Action Plan¹ and the 2009 GDS Associates, Inc.’s *Additional Opportunities for Energy Efficiency in New Hampshire*² document the high potential for increasing energy efficiency in existing building stock as well as the broad economic benefit to all rate payers of making such improvements relative to the cost of investing in new energy sources and distribution. Demand for energy efficiency improvements and renewable energy is high, but the initial investment necessary to implement projects is often prohibitive. The 2014 *New Hampshire 10-Year State Energy Strategy*³ highlights the lack of available financing for efficiency projects and the potential for programs such as property assessed clean energy financing to help overcome financial barriers. These reports all document

¹ http://des.nh.gov/organization/divisions/air/tsb/tps/climate/action_plan/nh_climate_action_plan.htm

² <http://www.puc.state.nh.us/Electric/GDS%20Report/NH%20Additional%20EE%20Opportunities%20Study%202019-09%20-%20Final.pdf>

³ <http://www.nh.gov/oep/energy/programs/documents/energy-strategy.pdf>



the broad public benefit, including both economic and environmental benefits, from such investments.

Thank you for the opportunity to provide testimony in support of this bill. Should you have further questions or need additional information, please feel free to contact Rebecca Ohler, Technical Programs Manager (271-6749, rebecca.ohler@des.nh.gov) or Michael Fitzgerald, Assistant Director, Air Resources Division (271-6390, Michael.fitzgerald@des.nh.gov).

Sincerely,



Thomas S. Burack
Commissioner

cc: HB 205 sponsors