

February 3, 2025

By Electronic Mail

The Hon. Michael Vose, Chair
Science, Technology and Energy Committee
N.H. House of Representatives
Concord, NH 03301

Re: HB 219, relative to the phasing out of the minimum electric renewable portfolio standard

Dear Chairman Vose and Honorable Committee Members,

Conservation Law Foundation (CLF) appreciates the opportunity to comment on HB 219, which would phase out the state’s Renewable Portfolio Standard (RPS). CLF is a non-profit environmental advocacy organization working in New Hampshire and across the region for healthy communities, including advancing energy policies that reduce pollution and strengthen the state’s economy. Because the RPS benefits New Hampshire’s economy and public health and helps diversify our energy mix, the Committee should reject HB 219.

Renewable Energy Benefits New Hampshire’s Economy

Renewables provide considerable economic and job benefits to our state. Currently, there are around 3,500 people employed in the renewable energy industry in New Hampshire,¹ and nearly \$800 million has been invested in the state’s solar industry to date.² There is also potential for significantly more renewable energy investments in the state. For example, the NH Department of Energy has estimated that a single offshore wind project in the Gulf of Maine would generate over 3,600 jobs and over \$840 million in benefits for the state.³

Without the RPS, New Hampshire will be unable to fully take advantage of the significant economic benefits of renewables. All of New Hampshire’s neighbors have RPS mandates and if New Hampshire’s RPS is eliminated it will result in New Hampshire losing out on the development of a renewable energy industry, while our neighbors reap the benefits.

The RPS Provides Energy Diversity Benefits and Decreases Energy Costs

The RPS statutes provide that renewable energy “can provide fuel diversity to the state and New England generation supply through use of local renewable fuels and resources that serve to displace and thereby lower regional dependence on fossil fuels,” which “has the potential to lower and stabilize future energy costs by reducing exposure to rising and volatile fossil fuel prices.” RSA 362-F:1. Eliminating the RPS will reduce the state’s fuel diversity and likely result in families and businesses facing even higher energy costs.

¹ *Clean Jobs America Report 2024*, E2, at 21 (Sept. 2024), https://cleanjobsamerica.e2.org/wp-content/uploads/2024/09/E2-2024-Clean-Jobs-America-Report_September-17-2024.pdf.

² *New Hampshire State Solar Overview through Q3 2024*, Solar Energy Industries Association (last visited Jan. 2025), <https://seia.org/state-solar-policy/new-hampshire-solar/>.

³ *Potential Environmental, Economic, and Energy Impacts in New Hampshire from Development of Offshore Wind in the Gulf of Maine*, NH Dept. of Energy, at 82 (Sept. 2023), <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/offshore-wind-potential-environmental-economic-energy-impacts-report.pdf>.

The region's overdependence on natural gas—with its extremely volatile prices—for power generation has contributed to high electric rates in the region.⁴ Conversely, renewable energy provides a price stabilizing effect for electric customers.⁵ Several studies demonstrate that increasing renewable energy generation would provide a hedge against volatile fossil fuel prices, lower wholesale energy prices, and provide system reliability benefits during peak winter periods.⁶ Thus, increased investments in renewables provide significant energy diversity benefits for New Hampshire, which help insulate families and businesses from volatile fossil fuel prices and can have a suppressing effect on electric rates. By eliminating the RPS, HB 219 would result in New Hampshire becoming even more exposed to fossil fuel price increases.

The RPS Provides Public Health Benefits to New Hampshire

Increasing the use of renewable energy in New Hampshire also has numerous public health benefits. Specifically, increased use of renewables reduces pollution resulting from the combustion of fossil fuels, which contributes to or exacerbates asthma and other respiratory problems, heart disease, and cancer.⁷ Fossil fuel combustion for power generation is a substantial source of particulate matter (PM) pollution. Nationwide, emissions of PM_{2.5} from energy related sources cause around 53,000 premature deaths each year and eliminating emissions of PM_{2.5} from these sources would yield at least \$600 billion in health benefits each year.⁸ Accordingly, getting rid of New Hampshire's RPS will increase power generation from fossil fuel resources and be detrimental to the health of our state's citizens.

In sum, New Hampshire's RPS provides significant economic, public health, and fuel diversity benefits and eliminating the RPS would result in NH losing out on these benefits. Therefore, CLF urges the Committee to reject HB 219 and vote "inexpedient to legislate."

Sincerely,

/s/ Nick Krakoff

Nick Krakoff
Senior Attorney
Conservation Law Foundation
27 North Main Street
Concord, NH 03301
nkrakoff@clf.org

⁴ See Sharon Udasin, *New England grapples with sky-high electricity rates as Ukraine war squeezes gas supply*, The Hill (Jan. 8, 2023), <https://thehill.com/policy/equilibrium-sustainability/3802915-new-england-grapples-with-sky-high-electricity-rates-as-ukraine-war-squeezes-gas-supply/>.

⁵ Dave Keating, *Can renewables solve the inflation crisis?*, Energy Monitor (Oct. 12, 2022), <https://www.energymonitor.ai/finance/regulation-policy/can-renewable-energy-solve-the-inflation-crisis/>.

⁶ *Charting the Wind: Quantifying the Ratepayer, Climate, and Public Health Benefits of Offshore Wind in New England*, Synapse Energy Economics (Jun. 3, 2024), <https://www.synapse-energy.com/sites/default/files/Synapse%20Offshore%20Wind%20Benefits%20in%20New%20England%2020240603%2024-024.pdf>; *Benefits of Wind Energy for New England*, Renew Northeast (Feb. 1, 2023), <https://renewne.org/the-value-of-wind-in-winter/>; *Market and Environmental Benefits of New England Renewable Generation*, Daymark Energy Advisors (Dec. 20, 2022), https://cleanpower.org/wp-content/uploads/gateway/2022/12/ACP_Daymark_MarketEnv_Benefits_Final_Public.pdf.

⁷ *Community Health Impacts of Air Pollution in the U.S.*, Clean Air Task Force, at 8-9, 11 (Jan. 2024), available at <https://cdn.catf.us/wp-content/uploads/2024/01/19170229/community-health-impacts-air-pollution.pdf>.

⁸ Nicholas A. Mailloux et al., *Nationwide and Regional PM_{2.5}-Related Air Quality Health Benefits from the Removal of Energy-Related Emissions in the United States*, GeoHealth, at 10 (Apr. 2022), <https://doi.org/10.1029/2022GH000603>.