



# New England Ratepayers Association

September 7, 2018

Karen Cramton, Sustainable Energy Division Director  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2429

**Re: NERA Comments on Renewable Portfolio Standard Review (RSA 362-F:5)**

Dear Ms. Cramton,

The New England Ratepayers Association wished to submit the following comments regarding the Renewable Portfolio Standard (RPS) Review:

As we have stated continuously in meetings during this process, NERA believes that a Renewable Portfolio Standard should not discriminate against technologies or favor older or newer generation by the creation of classes or bifurcating the RPS with vintage dates. Instead, New Hampshire should have an RPS that both supports renewables and protects ratepayers from paying more than they need to by eliminating ALL classes and ALL vintage dates. This would compel renewable technologies to compete against each other to provide the most value to the state and its ratepayers in the most efficient and least expensive form possible.

Respectfully submitted,

Marc Brown  
President, New England Ratepayers Association