

November 14, 2025

New Hampshire Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, NH 03301

Written Comments on New Hampshire Comprehensive Climate Action Plan (CCAP)
Draft Greenhouse Gas (GHG) Reduction Measures

To the New Hampshire Department of Environmental Services (DES):

Acadia Center appreciates the opportunity to submit written comments on the New Hampshire Comprehensive Climate Action Plan (CCAP) [Draft Greenhouse Gas \(GHG\) Reduction Measures](#) ("Draft Measures"). [Acadia Center](#) is a non-profit research and advocacy organization with over 25 years of experience dedicated to advancing transformative clean energy solutions that promote a livable climate and a more equitable economy at the state, regional and community levels primarily in the northeastern U.S. and eastern Canada. Through rigorous data analysis and strategic partnerships, Acadia Center advocates for policies that significantly reduce carbon emissions and address systemic energy challenges. By collaborating with stakeholders, government, business, and communities, Acadia Center pursues ambitious but pragmatic strategies that help to ensure an inclusive and sustainable energy future for all.

Acadia Center's comments are organized by sector in the following format:

- Putting New Hampshire's Estimated GHG Reductions from CCAP Draft Measures in Context with Other New England States
- General Concerns with Draft Measures Presented to Stakeholders
- Transportation Sector Draft Measures: Specific Comments
- Buildings Sector Draft Measures: Specific Comments
- Electricity Generation and Use Sector Draft Measures: Specific Comments
- Waste and Materials Management Sector Draft Measures: Specific Comments
- Natural and Working Lands Sector: Specific Comments

Acadia Center appreciates the time and effort that NH DES staff have put into the process and materials for the CCAP thus far, and we hope the comments and recommendations below will be constructive and help strengthen the impact and efficacy of the final plan in delivering affordability, resilience, and economic benefits to New Hampshire families and businesses.

At the highest level, Acadia Center urges DES Staff and other NH policymakers to view this planning process not merely in terms of "climate" or "emissions reductions." Instead, this process should be seen for what it truly is, which is a way to meaningfully address the very real underlying energy cost drivers that are hurting NH families and businesses, improve overall energy system affordability, and improve the resilience of both energy

infrastructure and individual homes and businesses – all while driving job creation and localizing a greater share of total energy expenditures into the New Hampshire economy (\$7.3 billion in 2023, per U.S. EIA), rather than sending those dollars out of state. As such, while a focus should rightly be on emissions reductions, New Hampshire should indeed forge ahead to craft a strengthened plan to address affordability, economic growth, job creation, and resilience as much as it should do so to address climate and emissions.

Putting New Hampshire's Estimated GHG Reductions from CCAP Draft Measures in Context with Other New England States

The draft measures provide estimates of GHG reduction projections for individual draft measures for the year 2030, and in some cases for the year 2050, but does not explicitly address the total cumulative, economy-wide GHG reduction impact associated with all measures or detail how this cumulative GHG reduction impacts the overall GHG reduction trajectory of the state. Thus, stakeholders must “connect the dots” to understand the estimated 2030 emission reductions in the larger context.

Based on Acadia Center analysis of available data, New Hampshire has reduced total GHG emissions by approximately 0.8% below 1990 levels by 2022, the year of the most recent GHG inventory data provided by the state.¹ NHDES typically frames emission reduction progress around a 2005 baseline year (e.g., [2024 New Hampshire Priority Climate Action Plan](#)). Using the 2005 baseline puts the state's overall GHG trajectory in a more favorable light (2022 total emissions are 29% below the 2005 baseline), however, the use of the 2005 baseline differs from the approach taken in the [2009 New Hampshire Climate Action Plan](#)², which emphasized a 1990 baseline and suggested long-term GHG reduction goals based on the 1990 baseline.

The distinction between utilization of a 1990 baseline and a 2005 baseline for measuring the state's overall emission reduction progress is important, because the use of a 1990 baseline by the majority of states in the region for setting GHG reduction targets (particularly for the target year of 2030) enables apples-to-apples comparisons between the goals of other New England States and the projected trajectory of New Hampshire based on CCAP analysis. Table 1 below highlights how other New England states measure 2030 emission reduction progress against a 1990 baseline year.

¹ Estimating 1990 baseline emissions for New Hampshire using current New Hampshire GHG accounting methodologies was challenging since 1) The precise methodology to achieve the 2022 inventory estimate is not well documented and 2) The 2024 Priority Climate Action does not reference 1990 emission levels. Acadia Center estimated 1990 emissions at 16.82 MMT CO₂e by multiplying the ratio of total New Hampshire 1990: 2005 emissions (71.24%) according to the [U.S. Environmental Protection Agency \(EPA\) State Inventory Tool \(SIT\)](#) by the 2005 emission levels reported in the [2024 New Hampshire Priority Climate Action Plan](#) (23.61 MMT CO₂e). 71.24% x 23.61 MMT CO₂e (2005 emissions) = 16.82 MMT CO₂e (1990 emissions).

² The 2009 New Hampshire Climate Action Plan includes a 1990 total emissions estimate of 15.79 MMT CO₂e but it is not entirely clear how much the state's inventory methodology has changed between the 1990 inventory and the 2022 inventory, thus making direct comparisons challenging.

Table 1. 2030 Climate Targets of Select New England States

State	2030 GHG Reduction Target
Maine	45% below 1990 levels by 2030
Vermont	40% below 1990 levels by 2030
Massachusetts	50% below 1990 levels by 2030
Rhode Island	45% below 1990 levels by 2030

If considered cumulatively, the draft measures proposed by NHDES are estimated to achieve a 1.53 MMTCO₂e reduction in emissions in the year 2030, relative to a 2022 NH emissions total of 16.68 MMTCO₂e. In other words, NHDES is estimating that, if all proposed CCAP measures are adopted:

- Total 2030 emissions will be approximately 9.1% below 2022 levels of emissions
- Total 2030 emissions will be approximately 9.9% below 1990 levels of emissions
- This 9.9% below 1990 levels by 2030 approximation, based on the data available to Acadia Center, provides a high-level snapshot of how the New Hampshire CCAP lacks scale and impact relative to the climate goals and plans of other New England states, indicating an opportunity to strengthen the final CCAP to avoid missing out on benefits being reaped by other states for affordability, resilience, and economic growth.

It's worth noting the above approach assumes: 2022 emissions minus 2030 emission reductions estimated in the CCAP equals projected 2030 emissions. This is a simplified approach and more rigorous quantitative analysis (e.g., assumed business-as-usual growth rates from 2022-2030, interactive effects of measures, etc.) would need to be taken into account for a more precise estimates of total 2030 emissions assuming implementation of all draft CCAP measures. It's not clear to what extent the NHDES individual measure GHG reduction projections took these variables into account.

General Concerns with Draft Measures Presented to Stakeholders

Because New Hampshire, unlike peer states in the region, has not established overarching economy-wide GHG reduction goals for future years, there is no “north star” guiding the collection of measures assembled. Best practice would entail a state analyzing the collective GHG reduction impact of a suite of measures to determine whether that particular suite of measures is projected to achieve the overarching economy-wide GHG reduction target for a future year (e.g., 2030). However, this is not the case with the collection of draft CCAP measures assembled for stakeholder input at this stage of the process.

There is a general lack of scale and impact among the proposed measures and, in most cases, the measures appear to be a continuation of the status quo (e.g., implementation of existing transportation plans, continuation of NHSaves program, etc.). Several measures rely on “promoting”, “encouraging” or “supporting” rather than establishing specific requirements or standards, and thus seems likely to not produce measurable or durable

emission reductions. Across sectors, the assumptions undergirding specific measure emission reduction projections appear optimistic without making clear if the program has the capacity to deliver. There is also a general lack of detail among the draft measures that make the measure challenging for stakeholders to meaningfully evaluate. For example:

- Short descriptions of measures (~20 words) without any supporting narrative explanation are difficult to evaluate
- GHG reduction projections are challenging to evaluate because there is no accompanying methodological explanation of how the total reduction projection was calculated. This is particularly concerning for measures that are supposed to drive the most GHG reductions (e.g., Transportation Sector Measure 1.6, Buildings Sector Measure 2.2).
- No cost-benefit analysis or quantification of consumer benefits to help enable comparative analysis across draft measures

More detailed feedback on several of the most significant economic sectors is presented in the sections below.

Transportation Sector Draft Measures: Specific Comments

Transportation is noted as the largest emission source for New Hampshire, yet the plan doesn't include a statewide electric vehicle (EV) adoption target or any enforceable regulations that will reduce transportation emissions. Furthermore, almost all of the modeled reductions in the transportation sector come from federal vehicle emission standards (e.g., Measure 1.5 & Measure 1.6), even though these standards are currently under attack at the federal level.

As a primary matter, the decision to forego participation in the Advanced Clean Cars and the Advanced Clean Trucks programs or an equivalent policy means that there are no enforceable strategies that can ensure transportation sector emissions reductions. What follows instead are small steps that are capable of only modest efforts, not deep decarbonization in this sector.

In addition, the proposed strategy on medium- and heavy-duty vehicles (Measure 1.4) specifically suggests providing grants to replace old diesel engines with newer diesel models. While newer diesel engines do make significant improvements in local air pollutants, the climate benefits of new diesel engines are minimal. New Hampshire should focus the limited resources available through the Clean Diesel Grant Program and the Granite State Clean Fleets Program on replacing diesel vehicles with zero-emission alternatives.

Next, the proposals on EV charging stations (e.g., Measure 1.6) repeatedly suggest that the state will make consumers more aware of available incentives. However, there are fewer federal incentives available, and the draft measures make no mention of whether the state will support state- or utility-funded EV charging incentives. No funding source for new EV infrastructure is identified at any point in the list of draft measures. The draft measures propose EV charging investments but do not estimate the charging infrastructure needs nor show how this infrastructure deployment would align with projected EV adoption rates. These missing assumptions make it difficult to validate the emissions estimate for Measure 1.6.

Finally, the strategy for state and municipal fleet electrification similarly has no specific funding mechanism attached to it.

Buildings Sector Draft Measures: Specific Comments

Overall, building sector measures appear to be continuation of status quo and lack binding tools to drive meaningful change and benefits for owners and residents of housing units across the state. For example, the draft measure contain no articulated ambition about increasing NHSaves investments or expanding program offerings to cover heat pump incentives [once existing incentives expire at end of 2025](#) or expansion of heat pump incentives to cover delivered fuels customers (Measure 2.1 & Measure 2.6).

In some cases, the emission reduction projections associated with specific measures seem overstated, and it is difficult to understand how the projection was calculated without supporting materials being provided to stakeholders.

- For example, the New England Heat Pump Accelerator (NEHPA) program (Measure 2.2) is projected to reduce 1.36 MMT CO₂e in 2050, but that figure represents over 50% of total residential building emissions in 2022 (2.56 MMT CO₂e) according to the state's GHG Inventory.
- Measure 2.4 and Measure 2.5 are focused on improving energy efficiency of state buildings and facilities. Combined, these two measures are projected to achieved emission reductions of 129,059 MT CO₂e. In contrast, Figure 15 from the [Fiscal Year 202 New Hampshire Annual Energy Report](#) appears to show total GHG emissions from fossil fuel combustion at state facilities of approximately 47,000 MT CO₂e. This implies the projected emission reductions from the two state efficiency measures well exceed (by a factor of 2.75X) current fossil fuel combustion emissions from state facilities. Additionally, the combined projected 2030 emission reductions from Measure 2.4 and Measure 2.5 are higher than the projected 2030 emission reductions for Measure 2.1 (63,987 MT CO₂e), which appears to encompass all emission reductions associated all residential energy efficiency work completed through NHSaves.

In addition, the draft measures do not include a recommendation that New Hampshire adopt the most recent IECC building energy code, or, as some states have done, exceed the International Energy Conservation Code (IECC) requirements through the development of state-specific amendments to IECC that further encourage electrification and increased overall efficiency (see [Massachusetts' three levels of building energy codes](#) as one example). New Hampshire has adopted the 2018 IECC which is now two full cycles behind the most recent IECC version (2024) adopted by other New England states like Rhode Island.

Finally, the draft measures also do not include the introduction of new funding mechanisms (beyond the NEHPA) to improve the overall efficiency of building stock in the state. While NEHPA will be key in advancing electrification efforts in the state, the combination of NEHPA and a status quo approach to NHSaves will not be sufficient to drive meaningful benefits and savings at the scale needed for statewide progress. In contrast, other states in the region are have considered the development of programs like a clean heat standard (see [Vermont, Massachusetts](#)) as a core source of funding to drive building improvements at pace and scale.

Electricity Generation and Use Sector Draft Measures: Specific Comments

Overall, Electricity Generation and Use Sector draft measure appear to be mostly a continuation of status quo and lack binding tools to drive change and savings to residents and businesses (e.g., continue participation in RGGI, promote demand response programs, encourage adoption of time-of-use rates (TOU) rates, etc.).

Acadia Center strongly supports New Hampshire's continued participation in RGGI. However, we do note that the plan's projected emission reduction from RGGI participation (Measure 3.1) appears to be dramatically overstated. A 610,651 MT CO₂e reduction from RGGI in 2030 translates to a 25.2% reduction in total state electricity generation emissions reported in the 2022 inventory. It is possible CCAP analysis is conflating the total projected decrease in RGGI allowances in New Hampshire from 2022 to 2030 with actual emissions reductions in the electricity sector. That's concerning considering that Measure 3.1 is far and away the largest driver of emissions reductions in the electricity sector based on CCAP calculations. Further, with regard to RGGI, Measure 3.1 describes the historic split of spending of RGGI proceeds as "93% in ratepayer rebates, 7% in energy efficiency via NHsaves rebate programs." Acadia Center suggests inverting or at least better balancing that ratio with a larger focus on durable energy savings delivered to New Hampshire residents through increased investment levels in energy efficiency, opposed to one-off direct bill assistance payments that lack durability/must be repeated year after year.

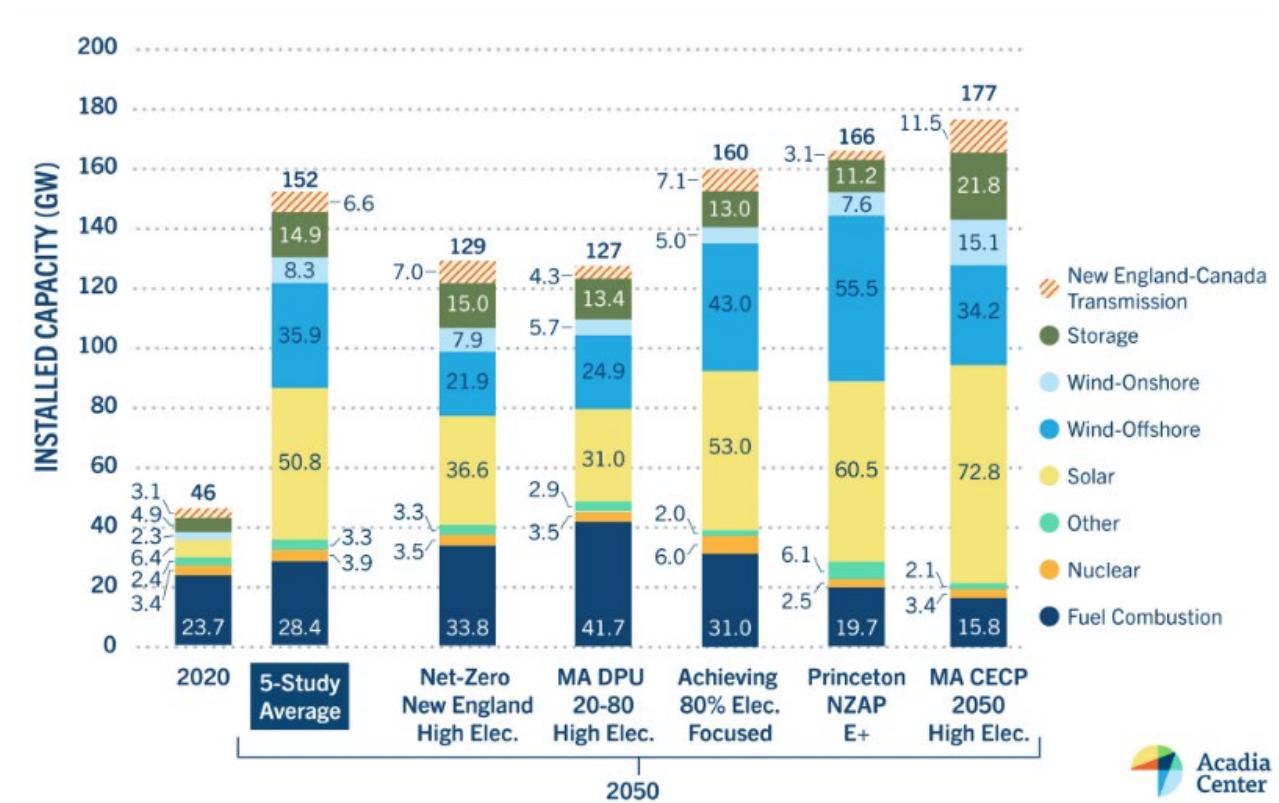
Separately, discussion of improving large-scale grid infrastructure siting in New Hampshire is noticeably absent from the list of draft measures. Simplifying permitting for ground-mounted solar developments (Measures 3.4) seems like a potentially impactful measure, but the measure is limited to projects under 5 MW and details are very limited. The referenced legislation (SB 65-FN) appears to be limited to reducing restrictions on stormwater regulations for solar developments. The inclusion of only smaller solar projects leaves a large permitting gap, as there are major opportunities for both streamlining as well as improved community engagement processes for larger utility-scale projects in the 10-20 MW and up category (solar, wind, energy storage, transmission, etc.), which should be acted on as well.

Other New England states like Massachusetts are enacting [comprehensive siting and permitting reforms](#) to speed the deployment of renewable capacity and improve host community outcomes. In addition to siting, large-scale renewable energy procurement will be critical for New Hampshire to pursue to both reduce consumer energy costs and make progress on GHG reductions, including but not limited to participating in future offshore wind opportunities in the Gulf of Maine and off Nova Scotia, participating in other multi-state procurement efforts, and investigating opportunities to best utilize major existing grid injection points like the excess substation capacity at the Seabrook nuclear generation station. Acadia Center does applaud New Hampshire for its continued participation in the regional Longer Term Transmission Planning (LTP) process with all other New England states, and we see this model – especially the ex ante cost allocation agreement – as a promising foundation on which to build further multi-state grid infrastructure procurement activities.

As it relates to the siting and permitting point directly above, Acadia Center, in partnership with Clean Air Task Force (CATF), analyzed the level of renewable capacity buildout needed to achieve regional decarbonization

targets through a literature review of five studies focused on modeling deep decarbonization pathways in the region. The results can be found in [The Energy is About To Shift report](#), released in late 2024. Figure 1 below summarizes one of the key results from the report – between 2020 and 2050, the studies suggest total installed generation capacity in New England will need to increase to 145 GW – nearly 3.4 times higher than currently installed. Solar (51 GW) and offshore wind (36 GW) dominate 2050 generation capacity, representing 39% and 28% of modeled 2050 generation capacity, respectively. Meeting this pace will mean the six New England states siting, permitting, interconnecting, and commissioning up to 5 GW of new clean energy capacity *per year* for the next twenty years. New Hampshire must therefore ensure its siting rules, regulations, and processes are right-sized and sufficiently resourced to accommodate that volume of proposals and deployments.

Figure 1. Installed New England Capacity by Resource Type:
2020 vs. 2050 5 Economy-Wide Decarbonization Studies



In addition to generation resources, draft measures would benefit from emphasizing a more proactive approach to regional and interregional transmission planning, given the importance of transmission as the power grid shifts to a greater reliance on renewable energy and peak demand on the system increases due to increased electrification of buildings and transportation. Acadia Center again applauds New Hampshire for participating in the Longer-Term Transmission Planning (LTP) process, which is a monumental step forward, demonstrating the region’s commitment to building a future-ready grid. If all goes to plan, it will soon result in the construction of urgently needed expanded transmission capacity to unbundle renewable capacity in northern Maine and perhaps northern New Hampshire as well.

New Hampshire clearly occupies a key geographic role in connecting southern New England load centers to the Québec province (and via Québec, other Canadian provinces). This presents an opportunity to proactively plan for and design transmission corridors (existing and new) that can be used for future interregional transmission efforts, including bidirectional flows north and south (e.g., similar to the concept presented by the now-cancelled Twin States Link). We hope that by proactively planning for these types of lines, New Hampshire can ensure that it reaps outsized benefits from any projects to come, including direct in-state grid benefits rather than projects built exclusively to merely pass through New Hampshire. This planning will help meet a clear and pressing need for the broader region: Acadia Center and CATF's [The Energy is About To Shift report](#) found – based on a lit review of five deep decarbonization studies – that interregional transmission capacity in New England will need to increase by greater than 4.5x by 2050, from approximately 5.1 GW to 23.7 GW, to accommodate additional renewables and increased electricity loads on the grid. This increase will help drive major benefits for affordability, resource adequacy, reliability, and resilience to extreme weather conditions.

As a final transmission priority, New Hampshire should continue its important work (e.g., through the Office of the Consumer Advocate) to improve the right-sizing of asset conditioning projects (ACPs), including projects like the 49-mile X-178 transmission upgrade project in Northern New Hampshire, to ensure maximal hosting capacity for renewable energy and headroom for vehicle and building electrification across the state.

Acadia Center also provides the following miscellaneous feedback on other grid/electricity-related topics:

- The [recent push for plug-in/balcony solar legislation in New Hampshire](#) represents an opportunity for residents to add low-cost solar PV and reduce energy bills. Acadia Center recommends this opportunity be incorporated as a measure in the CCAP.
- The current federal policy landscape presents significant uncertainty around the Solar4All program (Measure 3.2), and New Hampshire should consider supplemental and alternative funding sources to expand solar energy access for low-income households and disadvantaged communities in the state.
- Acadia Center supports promoting active demand response participation (Measure 3.5), but New Hampshire should consider making this program even more comprehensive by expanding it to a broader virtual power plant (VVP)/grid flexibility program, including components such as flexible EV charging, vehicle-to-everything (V2x) bidirectional charging, and heat pump hot water heaters demand response aggregations, with opportunities for robust third-party participation.
- Acadia Center supports encouraging adoption of time-of use (TOU) rates and advanced meter reading (AMR) technology (Measure 3.6), but the measure should consider deployment and utilization of true advanced metering infrastructure (AMI), a more advanced, two-way system that provides real time data and enables more sophisticated demand response and peak shaving programs than AMR technology. On a similar note, New Hampshire should consider the development of a heat pump rate, similar to the [heat pump rates recently developed and deployed in Massachusetts](#), that effectively reduce the winter operating cost of homes utilizing heat pump space heating and correct for the disproportionate share of electric system costs that heat pump customers are currently bearing. This should already be especially easy for Eversource/PSNH to design and implement having just gone through the process in Massachusetts.

Waste and Materials Management Sector Draft Measures: Specific Comments

Acadia Center offers the following additional points of feedback on the Waste and Materials management portion of the draft plan:

- Improper disposal of organic waste is leading cause of GHG emissions in the waste sector. Seeking to increase the stringency of the state's food waste disposal ban (Measure 4.1) over time would be impactful, as currently the ban is only applicable to entities generating at least one ton of organic waste per week. Massachusetts, for example, has ratcheted up their band to capture any facility producing over 0.5 tons per week.
- Expanding methane capture and reuse (Measure 4.6), opposed to direct venting or flaring of biogas, is a potentially impactful recommendation, but it is not clear if the Solid Waste Management Fund and Grant Program established in RSA 149-R is enough make potential projects financially viable. Expanded funding may be needed and preference for projects that generate cogeneration/combined heat and power (opposed to strictly electricity) should be given preference in program.
- Many of the measures rely on "promoting" or "increasing awareness" (e.g. Measure 4.4 & Measure 4.5) as opposed to strict enforcement, which raises questions about the viability of these measures to meaningfully reduce landfilled waste.

Natural and Working Lands Sector: Specific Comments

Finally, Acadia Center offers the following comment on the Natural and Working Lands section of the plan:

- Measures appear to be largely a continuation of status quo programs, and many include soft language (e.g. "promote") (e.g. Measure 5.4 & Measure 5.5) and lack specific detailed action steps, which raises questions about the viability of these measures in meaningfully impacting land use.

Conclusion

Thank you for taking the time to review Acadia Center's comments, and we hope they are useful in strengthening the proposed measures included in the New Hampshire CCAP. We are happy to discuss any of our comments in more detail with NHDES staff and can be reached via our contact info provided below. We look forward to the opportunity to review the full draft CCAP when it is released in spring of 2026.

Sincerely,

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