

March 29, 2017

Debra Howland Executive Director  
New Hampshire PUC  
21 Fruit Street  
Concord NH 03301



<sup>16</sup>  
Docket 15-576

Dear Director Howland,

I own a two person company, Barrington Power, that uses the Power Purchase Agreement toolset to provide solar system access to small companies, non-profits and municipalities that would otherwise not be able to justify the purchase. The returns are meager for these systems but we've built a structure that provides a fair discount for the customer and a modest long term return for us. I am writing today because the net metering discussion and it's apparent direction will directly impact our ability to provide our services to our customers.

Our average customer pays \$.14 per kilowatt hour and being modest sized entities they would like the full benefit of a system designed to meet their needs. We are providing them, a cost of \$.115 per kilowatt hour and six months of the year 1/3 to 1/2 of their production is net metered. It doesn't take high level math to quickly determine that this approach will simply not work if we do not have retail net metering rates.

We're a pretty small fish in this business so why should it matter? Each 100kw AC system we install represents \$80,000-100,000 in labor and we anticipate doing 4-6 systems this year. We help support high paying mostly union jobs in this state and will not be able to continue if the rates are reduced.

But beyond that I'd like to make a few other points. We do business in three New England states. In Maine and Vermont I can install a 100kw system tied directly to the utility for about \$12,000.00 complete. We are finishing up an installation in Cornish NH where the cost to interconnect has been \$80,000 because Eversource will not allow anything on a utility power pole and will not provide transformers. That price disparity I find breathtaking and wonder why I'm paying them \$8000.00 just for the privilege of connecting. How is it GMP and CMP can do all of this for \$12,000.

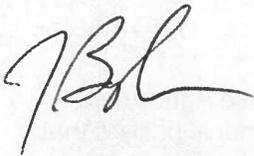
Secondly I'd like to make the point that in Maine and Vermont if you want to group net meter all we do is supply a list of meters and the kwhs are applied to the list by the utility. This is no doubt a pretty straight forward software based accounting process. In New Hampshire we are hamstrung by a needlessly complex process requiring lawyers, accounting time and taxable income to boot. I can not understand how handling all this data multiple times by multiple parties and generating checks for compensation could ever be as economical as just applying kwhs.

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I have read the Maine independent study on the value of net metering and understand there are 29 more at least. I don't think you will find an installer who is asking for \$.32 as the Maine study suggests is a fair value. All we want is retail.

I am struck by the disparity we face looking at the Vermont market. We are at somewhere around 1.5 percent of total load using renewables I believe, and we're told there is a cost shift the makes it costly for our utilities to provide service to non solar customers. And yet, in Vermont where they appear to have close to 15% of total load from renewables they somehow maintain 10-20% lower rates and there seems to be no cost shift in sight. They also are paying a premium for net metering, as much as \$.05 per kWh.

Finally I find it startling that we are debating a change in net metering rates because of a supposed cost shift that has not in any way been proven to exist. From my perspective, working in three states, our utilities have a pretty good deal going and they seem to only want more. The NH utilities have built a system that far exceeds the approach that our bordering state utilities take in terms of revenue from solar installs. Do they really need a better deal?



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