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Debra Howland, Executive Director and Secretary
NH Public Utilities Commission
21 S. Fruit Street – Suite 10
Concord, NH 03301
April 3, 2017

Re: DE 16-576 Net Metering

Dear Ms. Howland,

Thank you to the NH PUC for inviting public comment on DE 16-576.

I offer my comments as a consumer, chair of the Rindge Energy Commission, and a retired electrical engineer. I also participated in the Grid Modernization Workgroup for IR 15-296.

In my experiences with the Grid Mod docket, I have learned how important data (utility and customer) and real time pricing are. Unfortunately, there seems to be very little data available to produce load profiles and other necessary tools which are essential for developing a modernized grid that supports Demand Response (DR) and Distributed Generation (DG)

I fully support the Settlement Agreement proposed by the Energy Futures group.

In particular, I support,

- Postponing the start date for the new tariff scheme until September of 2017. This will give those who have been working on designs and applications to complete them at the current rates and give the market an opportunity to adjust to the new tariff.
- New Hampshire is far behind the surrounding states in terms of market penetration of DG. Allowing the 75% distribution credit until January 1, 2019 and 50% of distribution until the Phase II DER studies are complete will help incentivize more DG.
- Moving aggressively toward Phase II as described in the Settlement Agreement, “Within 60 days of the Commission order, a stakeholder working group will be created to develop specifics for the pilots and studies that will ultimately be approved by the Commission. The studies should seek to begin enrolling customers in 2018 and report back to the Commission every 180 days about the pilot’s progress.

A stakeholder working group should also define the parameters and data

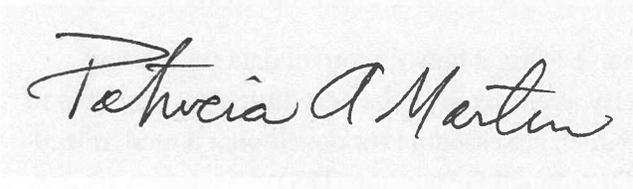
requirements of an independent, Commission-sponsored Value of DER study. The study should be conducted by January 1, 2020 and will be used inform the distribution export rate that goes into effect January 1, 2021.

The utilities should also develop optional Time-of-Use and "Smart Energy Home" rates that DER customers can sign up for beginning January 1, 2021.

The V-DER study should be updated every three years in order to account for changes in values and more precise data and analysis."

In summary, I applaud the Legislature and the PUC for opening this docket, and hope that with a Net Metering penetration of less than 2%, and insufficient data/instrumentation to support Time of Use or Real time pricing, that the Commission will support the Energy Futures Settlement Agreement as being the more reasonable and supportive of a thriving energy future for New Hampshire.

Sincerely,

A handwritten signature in black ink that reads "Patricia A. Martin". The signature is written in a cursive style and is centered on the page.

Patricia A Martin