

THE STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DOCKET NO. DE 16-576

Electric Distribution Utilities

**ADDITIONAL POST-ORDER COMMENTS OF PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY**

On June 23, 2017, the Commission issued Order No. 26,029 which, among other things, accepted and resolved various settlement matters and set a new net metering tariff for utilities in New Hampshire. Relevant to this submission, in its Order the Commission identified issues relating to the “grandfathering” of net metered customers requiring additional comments. Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) and others submitted comments in response. One set of comments included a recommendation on an item the Commission noted as not having been raised in its prior request for comments. Consequently, by secretarial letter of August 7, 2017, the Commission requested additional comments on this recommendation. By this submission, Eversource provides its comments on the additional issue identified by the Commission.

In its secretarial letter, the Commission included the underlying recommendation, specifically:

that the Commission specify that grandfathered customers shall have the option of voluntarily moving to another tariff or program in the future, as options such as time-of-use pricing may be made available through future proceedings. We also strongly urge the Commission to include flexibility in this specification that allows new technology offerings, such as energy storage, to become available and widely implemented.

August 7, 2017 Secretarial Letter at 1. The Commission then “determined that parties should have an opportunity to submit written comments regarding the issue of voluntary tariff-switching by net-metered customer-generators.” *Id.*

In general, Eversource supports the future voluntary movement of grandfathered customers to a new tariff. As new tariffs or programs come available, absent some strong countervailing interest that may exist at that time, a grandfathered net metered customer should be permitted to choose to enroll him or herself in the new tariff. Relevant to the specific item identified in the above comments, for example, Eversource has no reason to believe that there is any reason to restrict or forbid a grandfathered customer from moving to a time of use rate. Customers should not arbitrarily be restricted to the existing tariff if they perceive that some advantage may be had from moving to a new one.

Eversource does note one caveat. Any voluntary movement of a grandfathered customer to a new rate structure, should be a “one way” move. That is, if a customer elects to abandon grandfathered status to take advantage of some new rate structure, the customer should not later be permitted to regain the treatment of a grandfathered customer should he or she not wish to remain on the new tariff or rate. New Hampshire law presumes that customers should be responsible for the consequences of their choices in electricity products and services,¹ and the choice to forego remaining as a grandfathered net metering customer should be no different. Additionally, such a restriction would avoid the administrative burden that would come with attempting to track such customers and move them in and out of grandfathered status.

For clarity, Eversource does not advocate that if a grandfathered customer voluntarily moves to a new tariff, the customer should be required to remain on that tariff indefinitely,

¹ See RSA 374-F:3, II.

regardless of further developments in rates or technologies. Rather, Eversource only advocates that once a customer relinquishes the treatment that comes with grandfathered status, the customer may not regain such status later. In the future, the Commission will need to ensure that there is clarity regarding which customers are eligible for any new rate structures as they are developed and implemented. For the present, however, Eversource believes that net metered customers who are grandfathered into the existing rate structure should be able to voluntarily relinquish that status should the customer desire to do so.