

Warner Community Power Comments to Eversource  
Regarding their TOU Pilot Project Proposal

Presented on July 19, 2018

DE 16-576

I am pleased to provide the following comments on behalf of the Warner Community Power Project to Eversource regarding their proposed pilot project on time of use rates. My comments are not technically based, but from the customer perspective.

One of my objectives in attending the July 19<sup>th</sup> meeting was to understand the Eversource perspective and its goals with regards to a TOU pilot project, with the hope of finding common ground and a way forward with the Warner Community Power Project. Eversource's proposal and presentation at the July 19<sup>th</sup> meeting were very helpful in that respect.

An important take away for me was that pilot project cost is a primary concern for Eversource. To control this, Eversource proposed:

1. Leveraging data generated from other pilot projects, that they and other utilities have conducted across the country. These prior pilots span both DG and non-DG customers.
2. Limiting the pilot to existing metering and billing systems.
3. Energy storage could add significant cost and it was unclear about its inclusion.

As I understand the proposal presentation, the pilot aims to change customer power consumption patterns through incentives tied to peak load period rates. Customers would be paid more for their solar power production at peak times than at off peak times. The expectation is that the customer would opt to sell their power at the higher rate and defer power consumption to off peak times. The resulting data would then be used to help form future rates.

While the Eversource proposal is a very good step forward, I believe it could collect more beneficial data, by recognizing that not all customers are identical in their power consumption patterns. One size does not fit all and not all customers can adjust to or accept an either A or B option. In addition, energy consumption patterns change seasonally, adding another dimension to customer variability.

The introduction of energy storage would be a significant step in giving the customer control over these variations in consumption patterns. We understand that this can be achieved if Eversource were to offer a time of use rate that rewards energy storage, distributed generation and other technologies that enable communities to better harness and manage their energy loads. A time of use rate that rewarded energy storage would

improve customer buy in and have the effect that the adjusted consumption patterns would continue even after the pilot concluded.

One further step would be the introduction of smart meters. This would increase the customer's ability to understand their consumption and make adjustments that reduce their cost and benefit the electric system. An ideal smart meter would be one that automates the decision process around selling, storing and using energy. Even better, would be one that automated that decision in real time.

We understand that these suggested additions would increase the cost of the TOU pilot. Eversource should consider partnering in a joint pilot with other stakeholders, who could bring additional resources to the table to help cover these additional costs. Warner Community Power Project is interested in helping bring those stakeholders together, so that the needs of the PUC, Eversource and the customer are achieved.

Thank you,

Clyde Carson

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