STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

CERTIFIED ORIGINAL TRANSCRIPT

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June 29, 2018 - 10:12 a.m. Concord, New Hampshire

> RE: DE 16-576 ELECTRIC DISTRIBUTION UTILITIES: Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators. (Hearing on the Merits)

PRESENT: Chairman Martin P. Honigberg, Presiding Commissioner Kathryn M. Bailey Commissioner Michael S. Giaimo

Sandy Deno, Clerk

APPEARANCES: (No appearances taken - refer to the sign-in sheets posted online.)

Court Reporter: Susan J. Robidas, NHLCR No. 44

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PROCEEDINGS 1 2 CHAIRMAN HONIGBERG: Good morning, Please be seated. We're here this everyone. 3 morning in Docket 16-576, which is the 4 Alternative Net Metering docket. We have a 5 lot of things going on in that docket. 6 This 7 is to take public comment on Staff's report regarding the Value of DER Study. I have up 8 here some sign-in sheets which we'll deal 9 with momentarily. 10 11 Mr. Weisner, you want to do a little bit of a scene setup for us? 12 MR. WEISNER: Yes, Mr. Chairman. 13 14 Thank you. 15 What you have before you is Staff's 16 final report summarizing the proposed scope and timeline of the Value of Distributed 17 Energy Resources Study which is required to 18 be performed in this docket. 19 That report 20 reflects the work that was done over a period 21 of time, a number of months, in a working 22 group setting with interested stakeholders 23 representing a broad and diverse range of interested parties. And I'm pleased to note 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

that in the report, a number of study design 1 components are listed as being subject to 2 consensus among those working group 3 participants. Other design issues were not 4 the subject of consensus, and those are noted 5 In those cases, Staff has made a 6 as well. recommendation for the Commission's 7 consideration, and I expect that those 8 non-consensus items will be the focus of the 9 comments that we hear today. 10 11 We also have a proposed timeline. It's very preliminary. It's very conditional 12 and dependent on some other moving parts in 13 14 this complex proceeding, as you observed. So 15 I just want to offer that. That's our 16 current thinking -- or it was our current 17 thinking in May, and it's subject to change. This is a very dynamic process, as I'm sure 18 the Commission can appreciate. 19 I also want to notice -- note that 20 21 the Commission, in April, issued an order 22 which refocused what was anticipated to be 23 the non-wires alternative pilot program into a locational value study of the distribution 24

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level impacts of distributed generation. 1 One of the questions that's outstanding, as noted 2 in that order, is whether or not that would 3 be a stand-alone study or whether that would 4 be included in this study. And that issue 5 has not yet been resolved, but will be 6 important in determining the final scope of 7 the Value of DER Study. I think it's safe to 8 say that what we're trying to do here is 9 design the scope of work that would be 10 11 included in a request for proposals to engage a consultant to perform the study of 12 valuation using data and analysis that was 13 14 not available last year when the Commission 15 made its decision regarding the Alternative 16 Net Metering tariff which is currently in 17 effect. And so the issuance of the RFP would be the next step. I think it's fair to say 18 that that RFP should not be issued until that 19 20 other issue is resolved, but we expect to continue working on that and seek resolution 21 22 within the next few months. 23 CHAIRMAN HONIGBERG: The Staff's recommendation, which was filed in May, if 24

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you look on Page 17, there's a flow chart of 1 If you were to take a "You Are Here" 2 sorts. sticker, where would it go on the flow chart? 3 MR. WEISNER: In terms of the Value 4 5 of DER Study, we are between the box that says "Scope and Timeline Report Filed with 6 7 the commission" and the one that says "Commission Approves, Modifies or Rejects..." 8 On the right hand of that chart are all the 9 other things that are going on. 10 And the 11 first one on the left side is what I just referred to, the Distribution Locational 12 Value Study. Now, the way it's listed here 13 14 and the way we have it in the timeline 15 assumes that it will be a separate study on a 16 separate track. As I noted, that may not be 17 the case, but that's still an unresolved issue at this point. So that study, plus the 18 19 pilot programs, marginal cost of service 20 studies -- and Eversource is filing a new one 21 within the next few weeks -- and other data 22 collection as noted in the big box, that all 23 feeds into this Value of DER Study to be performed by the Commission's independent 24

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consultant. That study then gets filed with 1 2 the Commission and becomes the subject of a new proceeding a few years from now that will 3 reconsider net metering with that information 4 available. 5 CHAIRMAN HONIGBERG: 6 Thank you. Ι think that was helpful to orient all of us on 7 the map, such as it is. 8 I have two lists, and I'm assuming 9 that they were separate lists --10 11 (Discussion off the record) CHAIRMAN HONIGBERG: 12 So we're going to take -- we're just going to bounce back 13 and forth between the two sheets. 14 So the 15 first name on the first sheet I have is Henry Herndon. And I'll call three people so 16 17 people can get prepared. So, Henry Herndon is first, to be followed by Melissa Birchard 18 19 and then Clyde Carson. 20 MR. HERNDON: So I think my 21 comments -- I'm Henry Herndon, by the way. Ι 22 think my comments might be more valuable for the Commission following Clyde Carson, sort 23 of with him providing some initial input and 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

then --

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2	CHAIRMAN HONIGBERG: All rightie.	
3	Why don't we take the two of you together.	
4	Why don't we have Mr. Carson go first, and	
5	then we'll have Mr. Herndon, and then, Ms.	
6	Birchard, you can follow them.	
7	MR. CARSON: Good enough. My	
8	name's Clyde Carson. I'm a state	
9	representative from Merrimack District 7,	
10	representing the towns of Warner and Webster.	
11	I'm also a selectmen in the town of Warner	
12	and a founding member of the Warner Energy	
13	Committee.	
14	In my understanding, this hearing	
15	is to provide comments on the scope and	
16	timeline for the Value of Distributed Energy	
17	Resources Study, and my comments on behalf of	
18	the town of Warner pertain specifically to a	
19	proposal for a pilot project that will	
20	collect data that can be used to help inform	
21	that study in accordance with the schematic	
22	that we talked about just before.	
23	CHAIRMAN HONIGBERG: Can you slow	
24	down just a little 'cause the stenographer's	
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trying to get every word.

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MR. CARSON: Yeah, sorry. I'll go slower.

Geographically, Warner is located 4 in Merrimack County, along the Route 89 5 corridor. Warner has roughly 3,000 residents 6 7 and is typical of many New Hampshire towns. The Currier & Ives Scenic Byway passes 8 through the town. It's home to five museums, 9 a small college. The town has a vibrant 10 11 downtown village and, most importantly for today, is deeply committed to sustainable 12 13 energy.

14At the town's 2007 town meeting,15voters established the Warner Energy16Committee to support the town's commitment to17energy conservation, security, sustainability18and responsible energy usage. This committee19actively supports that charge.

20 One of our early projects resulted 21 from a grant from the PUC to perform an 22 energy audit on our town buildings. Margaret 23 Dillon's audit report that came from that 24 study provides a basis for multiple projects

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to improve the energy efficiency of our building envelopes. And we've done a lot of those projects over the last few years.

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More recently, the town has pursued 4 5 municipal solar, taking advantage of the state's group net metering program. 6 In 2016, 7 the Warner Village Water Precinct approved a 8 100 kW solar array located at our waste water treatment facility. And last year, the town 9 voters approved a second 100 kW solar array 10 11 located at the town's transfer station. The town is proud of these arrays, which produce 12 enough electricity to cover a hundred percent 13 14 of our municipal usage and have been cash 15 positive since day one. So, they've been 16 good projects.

17 The array at our transfer station is also a part of a plan to integrate the 18 19 town's support for recycling, renewable 20 energy, sustainable gardening in an 21 educational setting, as well as providing a 22 pollinator-friendly habitat. The point that 23 I want to make is that Warner has a vision and is committed to sustainable practices and 24

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that we have a track record to successfully 1 deliver projects related to that vision. 2 And that brings me to today's 3 purpose, which is to put a proposal on the 4 table for a pilot project in support of DE 5 16-576. Our proposal is to develop a model 6 7 that uses solar panels in combination with battery storage, smart meters and time-of-use 8 9 pricing. 10 The Warner Municipal Power Project 11 was initiated over the past year. Our team includes members of the Warner Energy 12 Committee and sustainable energy experts, 13 14 Henry Herndon from the New Hampshire 15 Sustainable Energy Association, as well as 16 support from Roy Morrison and Pentti Aalto. 17 In addition, we have been extremely fortunate to have the advice and 18 participation of Cliff Below. We are closely 19 20 following his project between City of Lebanon 21 and Liberty Utilities and hope to learn from 22 his project and utilize applicable pieces for 23 our project. The Warner Municipal Power Project 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

has also attracted interest and advice from Michael Swack, Carsey Institute; Don Kreis, New Hampshire Consumer Advocate; and Scott Maslansky from CDFA.

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And I'd like to highlight some of 5 the key points that we thought about in our 6 7 proposal. We want this to be a collaborative effort with Eversource; they're our default 8 utility. Henry Herndon and I met and had a 9 preliminary meeting with Eversource 10 11 representatives, and the proposal is actively being considered within the company. 12 Participants for the pilot would come from 13 low- to moderate-income families and 14 15 non-profits located in Warner. We envision 16 the number of participant locations would be 17 limited to around 24 single family homes, multi-family homes and non-profit business 18 In parallel, the Warner Energy 19 locations. 20 Committee wants to pursue a project to improve the energy efficiency of the 21 22 participating building envelopes. There may 23 be some benefit to some participants by including heat pumps, electrical vehicle 24

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charging as part of the model, and we want to consider that option as well.

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The sixth point I want to make is 3 we would like to seek funding so that there 4 would be no upfront cost to the participants. 5 CDFA has expressed interest in providing 6 financing for projects such as this one. 7 We would work collaboratively to find with 8 Eversource which data would be collected as 9 part of this pilot and supply it to the PUC 10 11 VDR study. A municipal project with Warner 12 would not preclude Eversource from pursuing other pilot projects, such as one that would 13 be scattered across the state geographically. 14 15 And a key goal of this pilot would 16 be that the resulting model would serve as a 17 standard VDER model that could be expanded within Warner and replicated across the 18 19 state. 20 So, in summary, we believe that a 21 small, focused pilot project with Warner

offers a high probability of success due to our track record and would use useful data to the PUC VDER study, and it could be used to 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

build momentum for expansion of the resulting 1 model across the state. And our hope is that 2 the Commission and Eversource will support 3 our proposal and work with us to make it 4 5 successful. And I conclude my comments with 6 7 that and turn it over to Henry. CHAIRMAN HONIGBERG: 8 If you have written comments that you were reading from, 9 if you could provide them to the 10 11 stenographer, everybody will be happier. MR. CARSON: 12 Yeah. CHAIRMAN HONIGBERG: Mr. Herndon. 13 14 MR. HERNDON: Good morning. My 15 name is Henry Herndon. I work for New 16 Hampshire Sustainable Energy Association as Director for Local Energy Solutions, and my 17 job is to provide technical assistance to 18 cities and towns across the state seeking to 19 20 implement energy projects. So I've been 21 working closely with Representative Carson on 22 this project. 23 I've also been engaged in Public 24 Utility Commission proceedings for three

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years now, participating in the Energy 1 2 Efficiency Resource Standard, the Grid Modernization Working Group and this Net 3 Metering docket. And as Representative 4 5 Carson stated, the purpose of these comments are mostly aligned with providing some 6 7 context for that project as that -- in line with this schematic on Page 17, doing pilot 8 projects to generate data that can then 9 inform the VDER study. 10 11 So I think there's been a lot of 12 progress over the past year, particularly leadership from Cliff Below in Lebanon and

13 14 the Liberty Battery Storage Project, as well 15 as some progress on low and moderate income 16 programs. I think there's still a lot of 17 room for progress on some areas such as time of use and doing actually more to expand 18 access for low and moderate income 19 20 communities, and I think that's really where 21 the Warner project can provide value to this 22 Obviously, any successful pilot docket. 23 requires close collaboration with the So, again, I'd like to sort of 24 utilities.

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reiterate our appreciation to Rick Labrecque 1 and Matthew Fossum for engaging us in 2 preliminary conversations, and we hope to 3 continue to collaborate with Eversource 4 closely moving forward on this. 5 Beyond the partnership with 6 Eversource, I think there's a lot of 7 potential to build a broad coalition of 8 support around this project. Representative 9 10 Carson sort of alluded to some of the 11 engagements we've had already, so we're appreciative of the advisory role that 12 Clifton Below is playing and the support 13 we've received from the Consumer Advocate and 14 15 other stakeholders thus far, and we hope to 16 continue to work to do an inclusive, 17 participatory pilot project. So I'll just be quick and I'll sort 18 of summarize. I think our goals are to 19 20 design a project that is beneficial to the 21 community of Warner, that is beneficial to 22 the electricity grid as a whole, that meets 23 interests of numerous stakeholders involved in this proceeding, and that rewards the 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

1 utility in the process for facilitating such a project. And we believe that such a 2 project could then be replicated across the 3 state to the benefit of the many, many cities 4 and towns that are very interested in doing 5 innovative and modern technology deployment 6 7 and distributed energy resources. So, to conclude, we hope we can 8 9 continue to rely on the support from the Commission, from Eversource and the other 10 11 stakeholders, and hope to continue to work collaboratively with all parties. 12 Thank you. CHAIRMAN HONIGBERG: Ms. Birchard, 13 14 before you start, I'd like to add a couple of 15 question marks and "maybes" here. 16 Mr. Hayden, are you going to be 17 speaking? 18 MR. HAYDEN: I pass. 19 CHAIRMAN HONIGBERG: How about Jack 20 Ruderman? 21 MR. RUDERMAN: I'm also just going 22 to submit written comments. 23 CHAIRMAN HONIGBERG: I should have noted that there is a written comment 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

1 deadline. Mr. Weisner, when is it? July 10th, was it? 2 July 10th. 3 MR. WEISNER: That is correct. 4 5 CHAIRMAN HONIGBERG: So, anyone here or not can submit written comments by 6 7 July 10. All right. So, Ms. Birchard, 8 you're up, to be followed by Mr. Fossum and 9 then Kevin Sprague. 10 11 MS. BIRCHARD: Thank you for the 12 opportunity to speak today. My name is Melissa Birchard, and I am an attorney for 13 Conservation Law Foundation. CLF is a New 14 15 England-wide organization that works for the 16 interests of the environment, public health and communities. Our members are 17 particularly interested in addressing climate 18 change through market-based innovation. 19 20 I have just a handful of brief 21 comments today and will deliver more detailed 22 comments in writing. Conservation Law 23 Foundation applauds the Commission for its efforts to provide a neutral forum for 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

consensus-based decision-making regarding the 1 scope of the upcoming Value of DER Study. 2 We have found this process to be engaging and 3 informative. We believe that Staff's 4 recommendations reflect the efforts of the 5 parties to achieve consensus wherever 6 possible. And Staff's recommendations do, in 7 8 fact, reflect consensus on all but a handful of issues to the general scope of the 9 study -- as to the general scope of the study 10 11 of the Value of DER. I believe all parties agree that 12

the independent consultant retained by the 13 Commission should have further input into the 14 15 scope of this study that will be valuable. 16 In addition, I believe all parties agree that 17 there should be significant opportunities for further stakeholder engagement and input as 18 19 to the development of study parameters and 20 details. In general, CLF is quite supportive 21 of Staff's recommendations, with a few 22 exceptions and nuances that we will largely 23 address in written comments. One issue that Staff and 24

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stakeholders have wrestled with in earnest is 1 a very practical one, and that is how to keep 2 the cost of this study within reasonable 3 range. One result of the effort to keep 4 costs within a reasonable range is that in a 5 number of instances the recommendations do 6 seek qualitative/quantitative proxy 7 8 estimates. This approach has a number of benefits in cases where, for instance, New 9 Hampshire-specific data may be limited at 10 11 this time. While we naturally need to be careful about settling for less than complete 12 accuracy, regulation at a reasonable cost 13 14 generally does require some amount of Indeed, it is well established 15 pragmatism. 16 that proxy values can sometimes be 17 appropriate in valuation processes such as Likewise, it is well established that 18 these. 19 no material, non-zero values should be 20 entirely excluded from such valuations. The National Standard Practice 21 22 Manual for Assessing Cost-Effectiveness of 23 Energy Efficiency Resources, which presents an objective and neutral resource valuation 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

framework, includes this among its six 1 so-called "universal principles." So, that 2 National Standard Practice Manual was 3 developed by the National Efficiency 4 5 Screening Project. You may be aware of it. Specifically with respect to hard-to-quantify 6 impacts, the manual states as follows: 7 "Cost-effectiveness practices should account 8 for all relevant, substantive impacts (as 9 identified based on policy goals) even those 10 11 that are difficult to quantify and monetize. Using best-available information, proxies, 12 alternative thresholds or qualitative 13 considerations to approximate 14 15 hard-to-monetize impacts is preferable to 16 assuming those costs and benefits do not exist or have no value." 17 We concur that it is essential to 18 include material, but hard-to-quantify 19 20 impacts even if a proxy estimate provides the 21 greatest degree of accuracy that we can 22 reasonably achieve at this time. 23 Finally, my last comment pertains to environmental and public health 24

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externalities. It is widely understood that 1 these externalities are not fully included in 2 existing pricing and, in particular, the 3 region's wholesale markets. It is in part 4 for this reason that regional stakeholders, 5 including Conservation Law Foundation, have 6 7 proposed a market-based solution called the 8 "Dynamic Forward Clean Energy Market," that would better value low-emissions resources. 9 I will comment further on this subject in my 10 11 detailed written comments. In conclusion, I thank the Commissioners 12 for their time and look forward to continuing 13 14 to engage on this subject. CHAIRMAN HONIGBERG: 15 Thank you, Ms. 16 Birchard. 17 Before we get to you, Mr. Fossum, Mr. Aalto, you didn't say one way or the 18 19 other whether you wanted to speak. You just 20 wrote something else. 21 MR. AALTO: My apologies. I did 22 want to speak. 23 CHAIRMAN HONIGBERG: All right. So 24 we'll do Mr. Fossum, then Mr. Sprague and 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

then Mr. Aalto. 1 MR. FOSSUM: Do the mic check. 2 Good morning, and thank you for the 3 opportunity to comment. Eversource does have 4 5 a few comments this morning and concerns to raise regarding the proposed study scope. 6 7 And we'll keep our comments pretty well 8 confined to the Staff proposal this morning. We do also, along with some of the other 9 parties, intend to follow with written 10 11 comments by the deadline, and so today we'll just highlight some of the concerns that we 12 13 have. 14 First, and most generally, and as 15 Mr. Weisner noted this morning, there are a 16 number of places in the report that 17 referenced a "group consensus" on recommended approaches. We just wanted to highlight 18 19 that, due to the need to attend to certain storm restoration activities in March of this 20 year, essentially there were effectively no 21 22 utility representation at one of the meetings 23 where some of the consensus was reached. In general, Eversource does not have any 24

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significant problem with what is proposed to 1 2 be in scope but wanted to clarify that our agreement on what's within the scope of the 3 study is not necessarily agreement on the 4 5 recommended study approach. We want to be sure to inform the Commission of that this 6 morning not to unnecessarily inject 7 8 controversy, but to frame our understanding of this document and the study to follow and 9 to give some context for some of our comments 10 11 this morning. With that said, turning to a few of 12 the specific items contained in the Staff 13 14 report and proposal, looking at the tables that were included, and looking specifically 15 16 at Page 6, Table 1, Item 2, there's 17 references in there to the use of the AESC study "where appropriate." We just wanted to 18

highlight that item because, as the 20 Commission is aware, the AESC study is really aimed at energy efficiency, not distributed 21 22 energy resources, and serious consideration 23 should be given on whether and how to use the AESC in this case. 24

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Next, looking at Pages 7 and 8 on 1 2 Table 2 there, and Items 1 through 5, the report discusses the use of projections to 3 study things like energy capacity, ancillary 4 services, RPS and RNS and LNS. 5 On these items, there is actual current and historic 6 7 data that exists and we believe should be the basis for evaluating these items. 8 As we're all aware, any projections will ultimately 9 prove to be inaccurate. And in this case, 10 11 the items being evaluated are subject to very significant levels of uncertainty. 12 Attempting to forecast those items over the 13 long term will take likely a lot of time, 14 15 effort and cost and may lead to results that 16 can be the subject of much future debate. 17 Eversource would prefer that future projections that are subject to great 18 uncertainty not be the basis for setting of 19 20 future tariffs due to that very uncertainty. 21 If, however, these market-priced items are to 22 be included in the analysis, we believe all 23 relevant market-based items should be included, including those relating to the 24

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declining cost of solar equipment and installations.

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Looking next at Page 12, Table 2 3 and Item 16, under the Externality Benefits, 4 in that recommendation it states that the 5 Staff recommends that avoided environmental 6 externalities not already included in energy 7 8 prices be analyzed as a study sensitivity. In the column right next to it, there is a 9 quote there from the underlying Commission 10 11 order, Order 26,029 which includes the statement that the study may include, 12 "demonstrable and quantifiable" net benefits 13 associated with relevant externalities, such 14 15 as environmental or public health benefits, 16 provided that the potential for 17 double-counting of such externalities is adequately mitigated. 18 19 Including the externalities that 20 were identified by Staff, it appears not to

were identified by Staff, it appears not to line up entirely with what was pointed out in the order. For example, RPS markets covered include environmental attributes for certain sources, RGGIs that set price for carbon

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reduction, NOx, SO2 costs are encountered in 1 ISO-New England market price formation. 2 It appears in our initial analysis that some of 3 these externality benefits, if not all of 4 5 them, may be already accounted for and should not be included in the study scope. 6 And finally for this morning, 7 looking at Page 14, Table 2, Item 19, 8 relating to Customer Installed Net Costs, 9 Order 26-029 states that New 10 11 Hampshire-specific or industry estimates of customer installed system costs are 12 appropriate and should be included in the 13 14 study. And in discussing the approach to the 15 study, back on Page 4 of the Staff 16 recommendation, it notes that the study would 17 assess the relative benefits and costs of net 18 metered DG from the perspective of the 19 utility system as a whole, participating NEM 20 customer-generators and other electric 21 utility ratepayers. And it also says that 22 the Staff notes that participant cost 23 valuation criteria in particular may be used to evaluate how NEM crediting and 24

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compensation may affect reasonable opportunities to invest and receive fair compensation.

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In our comments this morning, we 4 just want to highlight and signal our 5 agreement with this aspect of the study. 6 We 7 are all hearing regularly of the substantial decrease in the cost of installed systems 8 under a variety metrics. Information on 9 installed costs to the end customer -- the 10 11 end-user customer would be very helpful in designing the next iteration of net metering 12 tariffs, assuring a fair and appropriate 13 14 compensation scheme. 15 Thank you. That's what I have for 16 this morning, and we'll follow with additional written comments by the deadline. 17 CHAIRMAN HONIGBERG: 18 Thank you, 19 Mr. Fossum. 20 Mr. Sprague, to be followed by Mr. 21 Aalto and then Brydon Ross. 22 MR. SPRAGUE: Thank you. My name 23 is Kevin Sprague. I'm the director of engineering at Unitil. Unitil would like to 24

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thank the Commission for the opportunity to 1 provide comments to the Value of DER Study 2 Scope and Timeline Final Report. Unitil was 3 an active participant in the stakeholder 4 5 process for developing the recommended project scope which has been presented to the 6 7 Commission for consideration. Unitil also would like to thank the New Hampshire PUC 8 Staff, OCA and other stakeholders for their 9 efforts in developing this recommendation. 10 11 Unitil is in general agreement with 12 the approach to the Value of DER Study. However, Unitil will reserve its right to 13 14 agree or disagree with the assumptions and/or 15 results presented in the study. Unitil would 16 also like to reiterate the point made that 17 the study results are not intended to predetermine future NEM, net energy metering, 18 tariff designs or applicable rates, but 19 20 rather to inform further NEM tariff 21 development proceedings before the 22 Commission. 23 Unitil hopes that the evaluation used in the study includes a rigorous 24

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sensitivity analysis to determine the impact 1 of all assumptions. A sensitivity analysis 2 will be useful to the Commission Staff and 3 all stakeholders to determine the 4 demonstrable and quantifiable net benefits. 5 The study should focus its efforts on 6 7 quantifiable net benefits as opposed to qualitative benefits that may be more vague 8 or not translate into direct monetary 9 10 benefits. If a value cannot be quantified, 11 the study should not include those criteria for consideration. 12

Unitil would also like to point out 13 that there is a cost associated with DG 14 interconnections. 15 Those costs are real and 16 can be rather significant depending on the location of the interconnection. 17 It is important for the study to identify the net 18 benefits -- meaning the total benefits minus 19 20 the total cost -- with respect to DG 21 interconnections. In some locations, the 22 analysis could result in a negative value. 23 Unitil would like to take the opportunity to identify a few elements of the 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

study and how those elements should be 1 treated in the study scope. 2 So, No. 5 in the table, 3 Transmission Capacity, this element should be 4 out of scope. Regional transmission planning 5 is conducted by ISO-New England using rigid 6 modeling criteria. It is not reasonable to 7 8 expect that random deployment of DER based upon retail net metering tariff in New 9 10 Hampshire will result in the avoidance of 11 future unidentified transmission system 12 expansion. No. 8, Distribution System 13 14 This element should be Operating Expenses. 15 in scope, but should be expanded to also 16 consider potential increases in operating 17 expenses, in addition to potential decreases or deferrals. 18 No. 12, Hedging and Wholesale Risk 19 This element should be out of 20 Premium. The risk premium in the retail 21 scope. 22 default energy service prices is related to 23 the market and customer load volatility. High penetrations of solar may increase 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

market volatility and increase risk premiums that are paid by non-participants that must pay the default energy prices. As for hedging, the distribution utilities do not engage in long-term energy supply hedging; thus, there are no hedging costs that will be avoided.

8 No. 16, Externality Benefits. This element should be out of scope. 9 DER is currently supported by several incentive 10 11 programs, such as rebates, tax incentives, 12 renewable energy credits, et cetera. These programs, especially the renewable energy 13 14 credits, are primarily a reflection of the 15 value of these externality benefits. As 16 such, it seems unlikely that any such benefits would satisfy the "double-counting" 17 language in the PUC order. 18

19 CHAIRMAN HONIGBERG: Wait. On that 20 one, the order specifically contemplates that 21 being in scope. Now, it may be that the 22 conclusion may be that the particular 23 elements have to be excluded as 24 double-counted. But you're saying that the 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

order, we should just -- the study should 1 ignore that part of the order? 2 That seems a little extreme. 3 MR. SPRAGUE: We believe that it's 4 going to be difficult for the working group 5 or the consultant to meet the double-counting 6 7 aspect of the order. CHAIRMAN HONIGBERG: 8 So they shouldn't even look at it. So it should be 9 out of scope -- you said out of scope. 10 11 MR. SPRAGUE: We believe it should be out of scope. 12 CHAIRMAN HONIGBERG: Okay. 13 Thanks. 14 MR. SPRAGUE: No. 19, Estimate of 15 Customer Installed Costs, this. Element 16 should be in scope. Page 61 of the Order 17 states that the New Hampshire-specific or industry estimates of customer installed 18 19 systems costs are appropriate and should be 20 included in the study. Unitil suggests a 21 review of various categories of solar -- for 22 example, a residential, a small commercial or 23 a large host project -- to examine the installed costs, net of all possible subsidy 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

and incentive programs, and preferential 1 accounting treatment. The review results 2 should be in standard metrics, such as 3 levelized cost of electricity and/or 4 investment payback period under various net 5 metering tariff scenarios. 6 7 Once again, Unitil would like to thank the Commission, Staff, OCA and other 8 stakeholders for all their efforts in this 9 10 report. 11 CHAIRMAN HONIGBERG: If you wouldn't mind leaving your written remarks 12 for the stenographer, that would be helpful. 13 14 All right. Mr. Aalto, to be 15 followed by Brydon Ross, and then I think Mr. 16 Kreis. 17 MR. AALTO: Thank you very much for the opportunity to speak. I'd like to focus 18 specifically on the wires part of the 19 20 business. But first, more generally, I 21 believe that the broad issue of value of 22 these various types of generation is a very 23 broad one and is probably best handled at another level -- that is to say, at a 24

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legislative, societal level that says solar 1 is useful for one reason or another, or a 2 fuel cell is useful for some other reason. 3 And NE subsidiaries that we might provide 4 should be done, I believe, outside of a more 5 market-oriented structure. And I believe 6 that from that point of view that we should 7 8 be focusing on the development of a pricing structure that represents a market for power. 9 Net metering, as we have it, is 10 11 indeed that type of price because it is effectively a spot market. 12 It is not a guaranty of anything to anyone either buying 13 or selling. Prices could change. 14 Contracts 15 for power should be done, I believe, 16 ultimately between customers and suppliers, 17 not through the utility, if we can avoid 18 that. So the fundamental issue that we 19 20 have is in the value of the wires aspect of Much of the discussion is 21 the business.

something like 50 feeders were looked at, and it was found that three of them might benefit

focused on the fact that in one example

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from distributed generation. The implication of that is that the distributed generation has no value toward distribution cost. If we accept that, we can basically hang up a good part of this process.

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I would say that a better approach 6 7 would be, since we have now a very substantial amount of what I call "excess 8 capacity" that we're all paying for now, and 9 10 the distributed generation would tend to add 11 to that, we have to ask: Is there some way that we can control those costs through this 12 process? And that argues for developing, or 13 14 perhaps on a more specific basis, the value 15 of power in the system. And that, in effect, 16 becomes the price. Toward that end, 17 time-dependent, system-status dependent and locational pricing becomes important. 18 In the situation where we already have excess 19 20 capacity on a feeder or other portion of the system, what I would argue is price it as if 21 22 it had been competitive in the past -- that 23 is to say, it has a price curve attached to 24 the system. If the loading on the system is

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1 zero, the price is zero. If the wire's ready 2 to melt, the price is infinite. And a curve 3 connects those that shows the usual 4 congestion types of characteristics -- that 5 is, it rises slowly with use and then rises 6 rapidly as congestion appears.

7 Pricing. Each of our separate 8 segments of our system going forward with that type of pricing structure, scale it so 9 that it provides for the revenue requirements 10 11 of the utility as a system as a whole. Some feeders would show low cost because they're 12 dramatically in excess. Some would show 13 14 higher prices because they need power. то those customers that choose to enter into 15 16 this type of highly volatile pricing, they 17 have the ability to shift load, generate power and respond to the pricing that's 18 If we can do that effectively, and I 19 there. 20 believe it's relatively easy to do that --21 and let me go and branch a bit into that. 22 If we put on each feeder a 23 power-measuring system that looks very much like the meter that a large primary service 24

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customer would have, we can in real time 1 provide the loading, assign a price to go 2 with that loading level, and make that 3 available to all other customers on that 4 5 feeder. If it's scaled properly, the feeder will sometimes under-recover and sometimes 6 7 over-recover its appropriate cost. A feeder 8 that is dramatically overbuilt will not recover its cost. One that is way underbuilt 9 and overloaded will recover more cost. 10 Scale 11 the whole system ultimately so that the utilities' revenue requirement are met. 12 What this gives us is an ability to control costs 13 14 going forward so that we can include beneficial uses of electricity to increase 15 16 load where it makes sense to do that, and to 17 provide the proper price signals for that without adding necessarily to the cost of the 18 19 distribution system; that way, we have a way 20 to absorb some of the potential shift of 21 generation within the system. With luck, 22 there'll be a good balance for some years 23 going forward. That gives us time to work 24 off the excess capacity and get to a

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structure where the system has appropriate matching of capacity with consumer response, which we've never had in the past, so that we can control the cost on that system and also simultaneously provide the pricing signal for people that are generating.

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Effectively what I'm speaking to 7 here is that we now, by doing this, we begin 8 to develop a retail market for electricity 9 that customers can respond to with their own 10 11 generation or with their own heat pumps or electric cars or whatever method makes the 12 most sense in a given area, and decisions 13 will be made based on those. 14

15 So, in terms of what the scope of the 16 study should be, we should include those 17 types of factors. This is the main piece that in many of the studies that I've 18 reviewed has missing. The assumption is we 19 20 have all the sunk costs. We'll just do a 21 fixed cost and recover it. That will not 22 work in this case because it doesn't provide 23 the proper pricing signals for either the general -- either the utility or customers 24

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going forward. We need to be able to control 1 the cost of distribution, or we will 2 ultimately end up with people defecting from 3 the grid, to general problems for everyone. 4 5 It would be an unnecessary waste of the existing structure we have. And I would hope 6 7 that we don't go the way of the railroads in this process, which I believe we have 8 potential to do. We're not there yet. 9 But if we work now, we may be able to shape our 10 11 pricing structure so that it properly reflects a market value for power at NE 12 location, at NE time, and allows the customer 13 14 effectively to compete for the electric 15 service that is provided by the wires business. We do that now with our energy 16 17 efficiency by not buying at kilowatt hour. Τ don't pay because the utility doesn't provide 18 the service. A generated kilowatt hour looks 19 20 exactly the same. My neighbor may use it and 21 pay full price for it. That is not a cost to 22 the utility. The only issue is revenue loss 23 for distribution service or wires service. Thank you again for the opportunity to 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

speak. If I can answer NE questions, I will 1 try. I should point out that I'm quite 2 dyslexic, so I have a great deal of 3 difficulty getting anything written. But I 4 5 will try to provide something to describe a method for payment for capital asset 6 7 distributed based on loading. Thank you. CHAIRMAN HONIGBERG: Thank you, Mr. 8 Aalto. Brydon Ross, Don Kreis, Ellen Hawes. 9 10 MR. ROSS: Can you hear me? 11 CHAIRMAN HONIGBERG: So far. MR. ROSS: Members of the 12 Commission, my name is Brydon Ross, and I'm 13 the vice-president of State Affairs for 14 15 Consumer Energy Alliance. As an interested 16 party and member of the Commission's Working 17 Group on the Value of DER Study, CEA appreciates this opportunity to participate 18 19 in today's proceedings and share its comments. We also want to thank the Staff 20 21 for the hard work on these efforts as well. 22 (Discussion off the record.) 23 CEA is a national non-partisan, non-profit trade association which has long 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

advocated for national and state energy 1 policies which focus on creating a diverse 2 portfolio of energy supplies from all 3 resources, including wind and solar, to 4 biofuels, petroleum, nuclear, clear-burning 5 natural gas, as well as energy efficiency. 6 7 We present energy consumers and end users across the nation, and CEA strongly supports 8 the increased use of solar and distributed 9 energy options. It is proud to advocate for 10 11 the utilization of solar energy resources that help meet our energy demands, temper 12 volatile energy prices and ensure fair access 13 14 to energy for everybody. 15 As part of its Solar Energy Future 16 campaign, CEA advocates on behalf of policies 17 that are pro-solar, pro-grid and pro-consumer. We believe solar will provide 18 long-term health, environmental and 19 cost-saving benefits for families and 20 businesses across the country and New 21 22 Hampshire. 23 CEA released a new report entitled, "Incentivizing Solar Energy: An In-Depth 24

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Analysis of U.S. Solar Incentives," which 1 updates the first-ever comprehensive review 2 it conducted in 2016 to quantify solar 3 incentives across multiple states. 4 5 Our new report expands its analysis to 25 states, and includes New Hampshire, and 6 7 it details the federal, state and local incentives for rooftop solar photovoltaic 8 systems that have seen tremendous growth 9 across the country. I've provided a copy of 10 11 the entire report as part of my statement 12 today, but I wanted to share a few highlights that are relevant to this hearing as the 13 Commission and Staff continues this important 14 work. 15 16 Among the study's key findings: Existing incentives for residential solar are 17 significant. In all but five of the states 18 that were analyzed, direct owners receive at 19 20 least 75 percent of their total system costs 21 back through incentives under a standard rate 22 structure. 23 Utility-scale solar installations

overall are less expensive to install and are 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

incentivized at lower rates per watt than 1 2 rooftop solar systems. Nationally, our study found that residential solar systems receive 3 on average between 104 percent and 4 5 140 percent of their total system costs back in incentives. Utility-scale solar 6 installations receive roughly 45 percent of 7 8 their total system costs back incentives. Our study found that 9 third-party-owned solar receives the most 10 11 significant incentives nationwide, and that's largely due to the accelerated depreciation 12 from tax benefits. 13 14 Solar installation may also shift 15 costs in some states, and in some cases to 16 other customers. Some states' net metering 17 programs which pay residential solar customers at full retail rates for their 18 excess electricity production can shift fixed 19 20 utility infrastructure costs onto other 21 non-solar customers. And our analysis found 22 that residential solar programs 23 unsurprisingly vary across the country. But 24 in New Hampshire specifically, a single 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

1 6.1-kilowatt direct-owned system receives 2 \$23,254 in taxpayer and net metering incentives, or about \$3.81 in incentives per 3 watt, which represents 118 percent of the 4 actual cost of the system. A single 5 6.1-kilowatt third-party-owner of a rooftop 6 7 system in New Hampshire receives \$24,741 in 8 taxpayer and net metering incentives, or about \$4.06 in incentives per watt. 9 That 10 represents 148 percent of the actual costs in 11 That's our study's analysis. the system. As this Commission knows, New 12 Hampshire already has some of the highest 13 residential, commercial and industrial 14 electric rates in the United States. 15 16 According to the most recent data from the Department of Energy, electric rates in New 17 Hampshire are 53 percent more than the 18 19 national average. CEA's primary interest as 20 the study process develops is insuring costs 21 remain fair and equitable for everyone as 22 solar distributed options continue to grow. 23 It is important that New Hampshire's existing incentive policies keep pace with tremendous 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

changes occurring in our dynamic electricity markets. The PUC is in the unique position through the Value of DER study process to address these energy costs while also promoting the continued growth of distributed energy, solar deployment, and modernizing New Hampshire's electricity grid.

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8 CEA has greatly appreciated the opportunity to be a part of the Commission's 9 working group and the chance to share its 10 11 input today. We look forward to continuing this work together, with the development of a 12 study that encourages New Hampshire's future 13 14 incentive policies to strike a thoughtful 15 balance in promoting distributed options with 16 the need to maintain a reliable and resilient 17 electricity grid that keeps overall rates as low as possible for families and businesses 18 19 that may be struggling to make ends meet. 20 Thank you for your time today. 21 CHAIRMAN HONIGBERG: Thank you, Mr. 22 Mr. Kreis and then Ms. Hawes. Ross. 23 Thank you Mr. Chairman. MR. KREIS: Guess it might make sense for me to do a mic 24 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

check like Mr. Ross did. I think everybody 1 2 can hear me. CHAIRMAN HONIGBERG: Yours sounds 3 great. 4 5 MR. KREIS: Thank you. Mr. Chairman, this public comment hearing is an 6 excellent opportunity to take stock of where 7 we are in the process of moving forward with 8 the instructions issued by the General Court 9 back in 2016 via the adoption of House 10 11 Bill 1116. As you know, HB1116 instructed the Commission to open what became Docket No. 12 DE 16-576. What public policy has guided 13 this docket since its inception? 14 The 15 legislature declared, and I quote, "It is in 16 the public interest to continue to provide 17 reasonable opportunities for electric customers to invest in and interconnect 18 customer-generator facilities and receive 19 20 fair compensation for such locally-produced 21 power while insuring costs and benefits are 22 fairly and transparently allocated among all 23 customers. The General Court continues to promote a balanced energy policy that 24

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1 supports economic growth and promotes energy 2 diversity, independence, reliability, 3 efficiency, regulatory predictability, 4 environmental benefits, a fair allocation of 5 costs and benefits, and a modern and flexible 6 electric grid that provides benefits for all 7 ratepayers."

The key phrase is, of course, 8 "reasonable opportunities, fair compensation, 9 fair allocation of costs and benefits," and 10 11 from the perspective of the Office of the Consumer Advocate, "benefits for all 12 ratepayers." By those standards, the scope 13 and timeline for the Value of Distributed 14 15 Energy Resources Study issued by the Staff is 16 well worthy of your approval.

As the document indicates, there is consensus among the stakeholders about the study parameters. There's also broad consensus on most of what deserves to be in the VDER value stack.

And I have to say here that I'm a little disappointed to hear Eversource say that because of a winter storm that diverted

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the company's resources during one of the 1 working group meetings, they don't 2 necessarily support what Staff indicates to 3 be the broad consensus on a bunch of issues 4 in the report that Staff issued. You know, I 5 understand -- this is equivalent to saying, 6 7 well, you know, I couldn't make it to school even though there wasn't a snow day because I 8 couldn't make it to school; so, therefore, 9 everything that happened at school during 10 11 that snow day shouldn't count. In reality, when you can't make it to school because 12 there was a snow day, you have to make up the 13 work later. And we have lots of stakeholder 14 15 processes that go on here at the PUC, and not 16 everybody can make every meeting. But there 17 are opportunities to catch up and to bring your views to bear on documents like the one 18 we're talking about here today. 19 And I'm 20 sorry that Eversource did not take the 21 opportunity to do that. 22 With respect to that value stack, 23 though, the consensus was attained I think on

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13 of 19 items. As to most of the remaining

six, the question is not whether to include the item, but how. And the Staff approach of developing a qualitative and quantitative proxy estimate is reasonable.

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And here I have to pause and say 5 that I'm disappointed to hear what Unitil had 6 to say because, as Chairman Honigberg 7 suggested, certain items that Unitil would 8 like you to declare to be out of scope are 9 really a form of bootstrapping because some 10 11 elements in the value stack will indeed be hard to quantify. But this kind of effort is 12 exactly what the consultant the Commission is 13 about to hire is going to undertake. 14 And 15 assuming that just because it's going to be 16 difficult it doesn't belong in the study is 17 basically an exercise in putting the cart before the horse. 18

As with net energy benefits in the energy -- or non-energy benefits, excuse me, in the energy efficiency realm, on behalf of residential customers, we look with favor on Staff's general emphasis on evidence-based assessments of impacts. The Staff's proposal 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

reasonably accommodates this imperative which we deem appropriate in light of the policy and political climate within which we all work.

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And I would also like to say I was 5 very pleased to hear what Selectman Carson 6 7 and Mr. Herndon had to say about what's been going on in Warner. I think it is really 8 encouraging to see these individual pilot 9 10 proposals popping up in various regions of 11 the state. I think the Commission should do 12 everything it can to encourage that kind of stuff. I think it would behoove Eversource 13 14 to be as cooperative as possible with what 15 the folks in Warner are trying to do, and I 16 think that it is useful to think about that 17 today in the context of the scoping document that Staff has placed before you. 18 The efforts that have taken place so far on 19 20 teeing up the VDER study might just be the 21 best example I have seen since I've been 22 hanging around here of the collaboration 23 between Staff of the PUC and the Office of Consumer Advocate that I now head. 24 We had 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

the good sense to hire a consultant who's 1 2 among the best in the business, and the Staff had the good sense to take his advice very 3 seriously. We believe that, going forward, 4 the VDER study will become the high water 5 mark of a consensus-based approach in which 6 7 stakeholders work together under the PUC's aegis to deliver benefits to all ratepayers 8 by making sure that distributed energy 9 resources assume their well-deserved place as 10 11 the key customer-empowering element of the 21st Century electricity grid. 12 13 CHAIRMAN HONIGBERG: Thank you, Mr. Kreis. 14 15 Ms. Hawes. 16 MS. HAWES: Good morning. This 17 seems to be working. I'm Ellen Hawes from Acadia Center. We focus on clean energy 18 economies in the northeast states by 19 20 providing policy and data analysis. Thank 21 you for this opportunity to speak. I will be 22 submitting joint written comments with some 23 of the other parties on the 10th, so I will try to be brief-ish. 24

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In general, Acadia Center strongly supports the study scope and the Staff recommendations on the non-consensus items. We believe there is a high level of consensus on the components that perhaps had the most significant values and are the most straightforward to quantify.

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In terms of the less certain items, 8 we support the Staff recommendation for 9 10 qualitative/quantitative proxies, and we 11 think an approach that incorporates sensitivity analysis and some sort of 12 recommended path forward for establishing 13 more set values in the future makes sense and 14 Most of 15 would be a good use of resources. 16 these values we're certain are not zero. So, 17 for that reason they shouldn't be excluded.

As Mr. Sprague noted, this is not a tariff proceeding. For that reason, Acadia Center thinks, to the extent feasible, each element should be separately and transparently quantified and studied with the decision about which and how much will be compensated with ratepayer funds to be

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decided at a later date. But at this point, 1 we think the study should include all of the 2 value, whether or not it's appropriate to 3 ultimately incorporate it in a tariff or not. 4 5 In particular, looking at Item 16, Externality Benefits, we think it's 6 appropriate given the language in the order 7 and in HB 1116. To conduct a sensitivity 8 analysis looking at the values, the 9 consultant and the Staff recommendations have 10 11 mentioned a number of models to look at. We think that's a reasonable approach. 12 We think the concern about double-counting is 13 14 unwarranted. It's very straightforward to 15 subtract things like RGGI, compliance costs, 16 and REC prices. In our own study on the 17 value of distributed generation, we did something similar and came up with a positive 18 net value. And again, the entire range of 19 20 externality benefits and the social cost of 21 carbon, the social cost of NOx and SOx, that 22 might not ultimately be paid for through net metering compensation, but it is a positive 23 It's easy to subtract out 24 net value.

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anything else that would be double-counted. 1 So at this stage we think it's appropriate to 2 include it. 3 A couple other items that were 4 raised by Unitil on the transmission 5 capacity, and perhaps I misunderstood the 6 7 remarks. But currently ISO-New England does include behind-the-meter solar PV in its 8 forecasts, so I think it's appropriate to 9 include avoided transmission costs. 10 11 And also on the hedging, I think it's not so much an issue of whether the 12 distribution utilities are themselves 13 14 hedging, but whether that hedging value is 15 included in the wholesale energy cost. So I 16 think we'll leave it at that. 17 Overall, I think the study scope that Staff submitted is strong and I think 18 19 has a good balance between costs and feasibility. Thank you. 20 21 CHAIRMAN HONIGBERG: Thank you, 22 Ms. Hawes. 23 That is everyone who signed up and said they did or might want to speak. 24

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Is

there anyone else who would like to say anything, or anyone who would like to say anything on top of what they've already said? [No verbal response] CHAIRMAN HONIGBERG: All right. We will close this portion of the public comment. Written comments can be filed up to July 10, and we will issue an appropriate order then as quickly as we can. Thank you all. (Hearing concluded at 11:12 a.m.) 16-576} [PUBLIC COMMENT HEARING] {06-29-18}

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9	forth, to the best of my skill and ability		
10	under the conditions present at the time.		
11	I further certify that I am neither		
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