

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

ELECTRIC DISTRIBUTION UTILITIES

Examination of Electric Distribution Utility Interconnection and Queue Management Processes
for Net-Metered Customer-Generators

Docket No. DE 15-271

COMMENTS OF THE ELECTRIC DISTRIBUTION UTILITIES

Following a June 19, 2015 memorandum from its Staff, on July 7, 2015 the New Hampshire Public Utilities Commission (“Commission”) issued an order of notice in the instant proceeding to “examine on a generic basis the customer-generator interconnection and net metering queue management procedures of the electric distribution utilities, and potential modifications to these procedures to achieve uniform, just, and reasonable processing of customer-generator applications in the context of the strong and growing interest in utility net metering programs.” Order of Notice in Docket No. DE 15-271 at 1-2. Thereafter, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, Unitil Energy Systems, Inc., and Public Service Company of New Hampshire d/b/a Eversource Energy (collectively, the “Electric Distribution Utilities” or “EDCs”), along with others, participated in a collaborative process to address the issues set out in the Commission’s order of notice.

In December 2015, the Staff issued a memorandum summarizing the activities and discussions in the docket, and providing a proposed set of recommended procedures for managing the EDC’s net metering applicant queues. A public hearing was held on the recommended procedures on January 7, 2015 at which essentially all parties stated their support for the procedures subject to providing additional clarifying comments in line with the schedule

set by the Commission. Consistent with that schedule, the EDCs provide their written comments on the recommended procedures herein.

At the outset, the EDCs note, as they individually had at the public hearing, that they are generally in support of the recommended procedures and provide only limited comments on them. As for the recommended procedures:

1. Relative to projects labeled as “Type C Projects,” the procedures presently provide that an applying customer-generator must supply “evidence of site control” and “evidence of sufficient project-specific customer-members to satisfy the requirements to be issued a group host authorization” to obtain an allocation in the net metering queue. The EDCs recommend that the procedures be amended to make clear that any disputes that may arise over the adequacy of the evidence required by the procedures shall be decided by the Commission.

2. With respect to the project waitlist, under the procedures, when the EDCs have exceeded the cap, they will maintain a waitlist of projects. A project’s position on the waitlist will be based upon the date the project met the initial requirements for allocation. If and when program capacity becomes available, a waitlisted project will be offered the opportunity to enter the net metering program according to its position on the waitlist. While this appears to be a straightforward method of maintaining the waitlist, there is one issue for which the EDCs believe clarification would be useful.

As an example, if there is 25 kW of space or “capacity” available in the Net Metering program and the next project in the waitlist is a 100 kW project, the available capacity is insufficient to permit this waitlisted project to join the net metering program. In such a case, the EDCs could either, “hold” the waitlist until additional projects drop out and a sufficient amount of capacity is available to accommodate this 100 kW project, or they could “skip” the 100 kW

project, and others if needed, until a project of 25 kW or less in the waitlist is found. In that the procedures state that the order of the waitlist is to be based upon the date that the applicants have satisfied the initial requirements, it would seem that the intent is for projects to enter the net metering program in that order, and that the waitlist should be “held” to allow projects to enter in date order. The EDCs believe it would be beneficial to all parties for the Commission to clarify how projects are to progress from the waitlist into the net metering program.

The EDCs appreciate the opportunity to provide these comments and stand ready to respond to any questions the Commission may have about them.