

STATE OF NEW HAMPSHIRE

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NHPUC JAN15'16 PM 2:49

January 15, 2016

New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

**Re: DE 15-271 Examination of Electric Distribution Utility Interconnection and Queue Management Processes for Net-Metered Customer-Generators**

Dear Executive Director Howland:

The Office of Consumer Advocate ("OCA") appreciates the opportunity to provide comments on the draft Net Metering Program Capacity Procedures dated December 3, 2015. The OCA generally supports Staff's procedural recommendations. However, the OCA strongly acknowledges the importance and value of a customer applicant's queue position. The OCA recommends that utilities provide customer applicants that have submitted an interconnection application, allocated an interconnection queue position and are now awaiting interconnection application approval with (1) effective communication of rules and requirements, including but not limited to, clear and explicit notice via physical or electronic mail that the Capacity Allocation Procedures have been revised;<sup>1</sup> and (2) sixty (60) days, (rather than the thirty (30) days recommended by Staff), to cure and comply with the Revised Capacity Allocation Procedures. It is important that customer applicants are afforded proper notice and adequate time to comply so that such applicants are not financially or economically aggrieved by the enactment of the Revised Capacity Allocation Procedures.

Respectfully,

Handwritten signature of Nicholas J. Cicale in black ink.

Nicholas J. Cicale  
Attorney for the Office Consumer Advocate

Handwritten signature of James J. Brennan in black ink.

James J. Brennan  
Finance Director

CC: Service List electronically

<sup>1</sup> Whichever method of contact has been used by the applicant in its application and is most likely to put the customer applicant on notice of the Revised Capacity Allocation Procedures.