

**BEFORE THE NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DE 15-271**

**ELECTRIC DISTRIBUTION UTILITIES**

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

**REPLY COMMENTS OF THE ALLIANCE FOR SOLAR CHOICE**

Pursuant to the letter scheduling a public comment hearing and written comment submission issued by the New Hampshire Public Utilities Commission (“Commission”) on December 4, 2015 in the above docket, The Alliance for Solar Choice (“TASC”), by and through its undersigned counsel, respectfully submits the following reply to comments submitted on January 15, 2016 on Commission Staff’s (“Staff”) proposed Net Metering Program Capacity Allocation Procedures (“Proposed Procedures” or “Proposal”).<sup>1</sup>

**1. Description of TASC**

TASC leads advocacy across the country for the rooftop solar industry. TASC’s member companies are actively involved in New Hampshire’s growing distributed generation industry. TASC is committed to offering New Hampshire citizens a viable choice in energy providers and advancing near-term, low-cost technologies for customers that preserve both the health of the solar industry and the public interest at large.

**2. Comments**

TASC’s opening comments highlighted the importance of a well-organized queue that allows participating businesses to monitor the status of the market and plan for development.<sup>2</sup> TASC recommended requiring an off-take agreement or power purchase agreement (“PPA”) for

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<sup>1</sup> TASC received comments from the Electric Distribution Utilities, Borrego Solar, Office of Consumer Advocate (“OCA”), and NhSolarGarden.com LLC.

<sup>2</sup> TASC Comments at p. 2.

Type C Projects to be admitted to the queue,<sup>3</sup> and requested clarification regarding the duties of administrators.<sup>4</sup>

Additionally, TASC recommended that residential systems smaller than 10 kW be tracked separately for the purpose of administrator reporting.<sup>5</sup> TASC continues to support this position, as separate tracking would give stakeholders a more granular picture of the types of systems being installed in New Hampshire.<sup>6</sup> Moreover, TASC believes that separately queuing small-scale residential projects could be an even more effective solution. Not only would separate queuing for small residential projects allow for separate tracking of these projects, thereby giving stakeholders greater insight into project development in the state, it would also overcome some of the challenges homeowners face when substantial amounts of capacity are taken up by large projects. Additionally, as the Electric Distribution Utilities noted in comments, uncertainty can arise when the project at the front of the queue is larger than the available capacity in the program, potentially creating a bottleneck as the queue is held up until sufficient capacity for the single large project is available.<sup>7</sup> Separately queuing small residential projects would mean homeowners would not be unnecessarily impeded from moving from the queue into the net metering program by these larger projects. TASC therefore recommends the Commission adopt a separate queue for small residential projects.

### **3. Conclusion**

TASC thanks the Commission for considering its comments in this proceeding and looks forward to continued participation as the process moves forward.

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<sup>3</sup> *Id.* at pp. 2-3.

<sup>4</sup> *Id.* at pp. 4-5.

<sup>5</sup> *Id.* at pp. 3-4.

<sup>6</sup> *Id.*

<sup>7</sup> Electric Distribution Utilities Comments at pp. 2-3.

Respectfully submitted,

/s/ Joseph F. Wiedman

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Counsel for The Alliance for Solar Choice

January 29, 2016

**Certificate of Service**

I hereby certify that a copy of the foregoing document has on this 29<sup>th</sup> day of January 2016 been sent by email to the attached service list in docket No. DE 15-271.

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