



DE 15-271

780 N. Commercial Street
P.O. Box 330
Manchester, NH 03105-0330

Matthew J. Fossum
Senior Counsel

603-634-2961
matthew.fossum@eversource.com

June 21, 2016

NHPUC 21JUN'16PM4:20

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 15-271, Electric Distribution Utilities

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

Request and Recommendation Regarding "Customer in Good Standing" Requirement

Dear Director Howland:

On March 22, 2016, the Commission issued Order No. 25,874 in Docket No. DE 15-271 wherein it approved "uniform and consistent procedures for electric distribution utility management of queues and waitlists for eligible customer-generators to enter net metering programs under RSA 362-A:9." Order No. 25,874 at 1. Additionally, that Order directed utilities, including Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource"), to follow those procedures when processing customer applications for an allocation in the net metering program and to implement the procedures in their service territories within 30 days of Order No. 25,874. On March 23, 2016, Commission Staff filed a version of the procedures that conformed to the requirements set out in Order No. 25,874. Those procedures include, for all types of projects, the following requirement:

The Applicant must be a customer in good standing with the interconnecting utility (e.g., the customer must not have been issued any disconnect notices during the preceding 12 months)

Eversource implemented the required procedures on April 18, 2016.

Since the effective date of the procedures, Eversource has been applying the above requirement that a customer be "in good standing" consistent with the application of the identical phrase as found reasonable by the Commission via Order 25,807 (September 2, 2015) in Docket No. DE 15-251. In that proceeding, Eversource argued, and the Commission agreed, that the

phrase “customer in good standing” means a customer who has not had any disconnect notices in the last 12 months of service with Eversource. When implementing the Commission’s required net metering queue management procedures, Eversource considered the consistent definition and application of that term to be necessary, particularly since the parenthetical phrase contained within the queue management procedures is essentially identical to the definition and application found reasonable in Order No. 25,807, and references the identical 12 month standard.

In applying that definition over the last few months, Eversource has denied over 30 customer applications for net metering. Such denials have been frustrating and confusing for customers, especially given that there is no action the customer can take to “cure” the issue, other than await the passage of time. Further, upon examination of the relevant facts and circumstances, Eversource believes that the reasons underlying the interpretation of the term “customer in good standing” in the context of Docket No. DE 15-251 do not necessarily apply in the net metering context. These considerations, along with discussions with affected customers, have prompted Eversource to reconsider the application of this requirement in the net metering queue management procedures and to seek the Commission’s approval of a change to the language of the net metering procedures to implement an amendment to the requirement.

For clarity, Eversource is in no way altering its position in Docket No. DE 15-251. Docket No. DE 15-251 was about the definition of the phrase “customer in good standing” as it relates to a customer’s ability to provide a personal guarantee as surety for another customer’s account under Puc 1203.03(i). In that context Eversource requires assurance that a customer providing a guarantee is, in fact, capable of meeting the requirements of that guarantee. Accordingly, Eversource continues to hold the position that the term “customer in good standing” as used in Puc 1203.03(i) is to be interpreted to mean that a customer has not received any notices for disconnection in the prior 12 months of service. Nevertheless, Eversource recognizes that the screening process relative to personal guarantees is not germane to the administration of a customer’s application for access to the net metering program for several reasons.

With respect to the use of the term in the net metering queue management procedures, Eversource believes that the “good standing” requirement was written in a way that could allow for different applications by each effected utility. In particular, the parenthetical phrase is provided as an example (“e.g.”) of how a utility might administer the screening step, but does not require use of that criterion. Further, the net metering queue management procedures apply not only to applicants installing projects at existing sites, but to sites with new construction as well. Requiring 12 months of billing history, with no notices of disconnection in that time, would make any newly constructed site ineligible for net metering for at least 12 months following the establishment of service to the site. For these reasons, Eversource proposes that the “good standing” requirement should be deleted from the queue management procedures and replaced by a standard more appropriate in this context. Specifically, Eversource recommends that the

provision of the net metering queue management procedures quoted above be reworded as follows:

The Applicant must be an existing or prospective customer of the interconnecting utility, and current on all payments owed to the utility as of the date upon which the customer seeks to enroll as a net metered customer.

Eversource believes that it is reasonable to have a requirement that a customer be current on all bills from the utility prior to that utility expending the effort to: 1) review and approve the interconnection application; 2) send a meter technician to install a new net metering meter; and 3) process the steps needed to transfer the customer's account from the current service plan into the net metering service plan within the customer billing system. In addition, once in the net metering program, net metering customer bills typically involve more processing time, and often lead to phone calls from customers. In other words, a net metered customer utilizes more utility resources than a non-net metered customer. Accordingly, it is reasonable to expect that a net metered customer will pay utility bills in a timely manner.

Eversource has discussed this change to the net metering queue management procedures with Liberty Utilities and Unitil Energy Systems, and is authorized to represent to the Commission that they agree with the proposed change. Additionally, Eversource has discussed this change with the Commission Staff and anticipates that the Staff will submit its own recommendation supporting the change. Given this broad agreement, Eversource requests that the Commission authorize and implement this change in as efficient a manner as possible. Eversource also notes that upon authorization of the change it will initiate contacts with any of its customers who had previously been denied admission to the net metering queue on the basis of payment history to determine whether the customers continue to desire space in the net metering program

Very truly yours,



Matthew J. Fossum
Senior Counsel

CC: Service List