

# STATE OF NEW HAMPSHIRE

Intra-Department Communication

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DATE: June 27, 2016

AT (OFFICE): NHPUC

**FROM:** Elizabeth R. Nixon, Energy Analyst

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

**TO:** Martin P. Honigberg, Chairman  
Robert R. Scott, Commissioner  
Kathryn M. Bailey, Commissioner  
Debra A. Howland, Executive Director and Secretary

**CC:** Karen P. Cramton, Director, Sustainable Energy Division  
Amanda Noonan, Director, Consumer Services and External Affairs  
David K. Wiesner, Staff Attorney

On June 21, 2016, Public Service Company of New Hampshire, d/b/a Eversource Energy (Eversource) filed a request and recommendation regarding the “customer in good standing” requirement included in the Net Metering Program Capacity Allocation Procedures (Procedures), approved by the Commission in Order No. 25,874 (March 22, 2016) and subsequently implemented by the three regulated electric distribution utilities.

Eversource noted that the Procedures as approved, adopted, and implemented preclude a customer from obtaining a net metering program allocation if the customer is not “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 effectively argued that this customer status condition results in the unintended consequence of excluding from net metering participation customers whose accounts may be current but who had late payments anytime within the past one-year period. These customers cannot even cure the deficiency but must instead have no alternative but to await the passage of time. Eversource characterized this effect as “frustrating and confusing for customers.”

Eversource recommended that the “good standing” requirement be removed from the Procedures and replaced with a condition that the customer must be “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 indicated that Liberty Utilities and Unitil Energy Systems both agree with this proposed change.

Commission Staff have reviewed Eversource’s request and recommendation and the stated basis for making the proposed change, and Staff agrees with Eversource that this modification of the Procedures is reasonable and appropriate and recommends that the Commission approve the changes proposed by Eversource as described above.

DE 15-271

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