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June 17, 2016

HPUC JUN17'16 PM 2:44

Via Electronic Mail and Hand Delivery

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

Re: Puc 903.02(j), Motion to Correct Errors in PUC Determination of Avoided Costs


Dear Ms. Howland,

Enclosed please find 7 copies of a Motion to Correct Errors in the PUC Determination of Avoided Costs pursuant to Puc 903.02(j). I am providing the Office of Consumer Advocate an electronic copy of this filing.

With the electronic copy of this filing I am including live copies of electronic spreadsheets in ".xlsx" format (Office Excel 2010) illustrating the errors and proposed corrections. As it is impractical and would serve no apparent purpose to print out images of the full spreadsheets (with many tabs containing over 8,760 lines of data) I have included only the one page summaries of avoided cost data from each of the analyses as Exhibits in the PDF of the motion and paper copies. Please advise if you have any problems with the electronic worksheets or would like these to be filed in any additional manner.

It is not apparent to me whether this motion necessarily triggers an adjudicative proceeding or if any other entities need to be served notice of this motion. However, because these historic avoided cost calculations are directly relevant to issues regarding the costs and benefits of net metered energy systems in DE 16-576 I will be providing a copy of this motion to all of the parties in that proceeding on Monday, 6/19/16, in support of informal data requests made by me on behalf of the City of Lebanon in that case. If you have any questions please don't hesitate to call.

Yours truly,



Clifton Below

Enc.