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January 9, 2019

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

RE: DE 17-172, Electric Utilities

Development of Renewable Energy Fund Programs for Low and Moderate Income
Residential Customers Under SB 129 of 2017

Comments of Eversource

Dear Director Howland:

On December 17, 2018, the Commission issued a secretarial letter in the above-referenced proceeding setting a public comment session for January 2, 2019 and a deadline for written comments of January 9, 2019. Included herein are the comments of Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") in response to that secretarial letter.

Thank you for your cooperation. Please do not hesitate to contact me with any questions.

Very truly yours,



Matthew J. Fossum
Senior Counsel

Enclosure
CC: Service List

Docket No. DE 17-172

Development of Renewable Energy Fund Programs for Low and Moderate Income Residential Customers Under SB 129 of 2017

Comments of Public Service Company of New Hampshire d/b/a Eversource Energy

January 9, 2019

On December 11, 2018, the Staff of the New Hampshire Public Utilities Commission (“Commission”) filed a memorandum recommending issuance of a Request for Proposals (“RFP”) for community solar photovoltaic projects that will provide direct benefits to low and moderate income residential electric customers. This recommendation represented the continuation of a program begun pursuant to Senate Bill 129 (2017) which amended portions of various statutes, including RSA 362-F:10 and RSA 362-A:9, XIV. The Staff also recommended that the RFP process be used to review and accept proposals for both state fiscal years 2019 and 2020.

On December 17, 2018, the Commission issued a secretarial letter setting a public comment session for January 2, 2019 and a deadline for written comments of January 9, 2019. Included herein are the comments of Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) in response to that secretarial letter.

In brief, and as stated by Eversource in its prior oral comments on this issue during the Commission’s March 2, 2018 comment session, Eversource remains generally neutral or supportive of the RFP process as proposed and has been implemented thus far. Eversource, therefore, takes this opportunity to reiterate its prior concern with respect to the potential obligations that may be placed on a utility to implement any proposals that may be made in response to the RFP.

The prior RFP, issued on March 23, 2018, included provisions requiring an explanation of the utility’s role in implementing any proposed project and included in its scoring criteria provisions relating to the administrative burden that would fall to the utility or the Commission from the proposal. Eversource states its continuing support for such requirements in any future RFP. To further the objective of understanding the administrative burdens, Eversource proposes that during the scoring process, the Staff consult with Eversource, or the other affected utility or utilities as needed, to gauge the level of administrative efforts required to implement any form of Virtual Net Metering or allocation that may be proposed.

Finally, Eversource requests that during any review, the utility be notified promptly if any winning project seeks to use the utility billing system in any manner. Such notification is necessary to understand what is being requested, what might be required to implement the request, and what preparations would be necessary to assure those requirements could be met.