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March 1, 2018

**Via Electronic Mail and US Mail**

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. To expedite consideration of this issue I'm also copying the non-PUC parties that were on the last service list that I have a copy of in DE 16-674.

My complaint alleges that PUC staff made an error with consequential results by incorrectly assuming that hourly time stamps for production from actual NH PV systems used for the calculation of avoided costs were based on an "hour ending" format, instead of an "hour beginning" format. This error resulted in a calculation of the value of avoided costs for both energy and capacity of surplus solar production of \$0.04594/kWh. The corrected calculation results in a value for surplus solar production of \$0.05001/kWh, or about 9% more.

To avoid a repeat of this error in the new calculation of avoided costs for the 12 months ending 3/31/18, I urge the Commission to expeditiously consider this motion and to that end I'd be happy to share the live spreadsheet with staff, OCA, and any other interested parties, in advance of an Order of Notice and Pre-hearing Conference. My formal motion only includes PDF versions of a few key pages from the spreadsheets used to document the error and corrected results. I also note that the relevant rule allows the PUC to correct an error on its own motion and in this instance the error may be so apparent and indisputable that the Commission may want to consider making a correction without the need for commencing an adjudicated proceeding.

Thank you for your attention to this matter and please don't hesitate to be in contact if you have any questions.

Yours truly,



Clifton Below

Enc.