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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: Docket No. DRM 19-158
N.H. Code Admin. Rules Puc 900, Net Metering for Customer-Owned Renewable
Energy Generation Resources of 1,000 Kilowatts or Less

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

Dear Director Howland:

Enclosed please find the comments of Public Service Company of New Hampshire d/b/a
Eversource Energy in the above-captioned proceeding.

Thank you for your assistance with this matter. If you have any questions about this
matter, please do not hesitate to contact me.

Very truly yours,



Matthew J. Fossum
Senior Regulatory Counsel

Enclosures
CC: Service List

LINKED

DRM 19-158

Chapter Puc 900 – Net Metering for Customer-Owned Renewable Energy Generation Resources of 1,000 Kilowatts or Less

Comments of Eversource

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) provides the below comments, edits, and suggestions on the draft Puc 900 rules as contained in the initial proposal of September 16, 2019 in the instant docket. Eversource notes, as did the Commission Staff during the October 31, 2019 public comment session, that the September 16 initial proposal addresses mostly matters intended to bring the rules in compliance with various changes in law and Commission orders over the last few years, but it does not address the implementation of the recently passed Senate Bill 165, nor other matter pertaining to items such as redefining a utility’s “normal course of business.” Accordingly, Eversource’s below comments are focused on the changes proposed only within the September 16 initial proposal, and it will reserve comments on the additional items once further amendments are proposed.

All page references are to the page numbers in the upper right of the document marked “Initial Proposal 9-6-19” and appended to the September 16, 2019 Commission filing in this docket.

1. **Page 6 – 903.02(e)(2).** Eversource recommends changing the word “outflow” to “export” or “exported”.
2. **Page 7 – 903.02(h)(3).** Eversource recommends changing the word “supplied” to “received”.
3. **Page 7 – 903.02(h)(4).** The word “than” should be “that”.
4. **Page 8 – 903.02(i)(5)c.** Similar to 903.02(r), this provision should also allow a payout of the monetary credit balance on account close-out and not just an annual basis.
5. **Page 8 – 903.02(j)(3) and (j)(4)b.** Eversource recommends changing “supplied to” to “received by”. In 903.02(j)(3) the change was made in one place, but not another.
6. **Page 8 – 903.02(j)(3).** With respect to the term “less a credit on default service charges,” Eversource asks whether there would be value in clarifying that this credit applies only to customers taking default service from the relevant utility.
7. **Page 9 – 903.02(j)(5)a.** As with 903.02(j)(3), above, Eversource asks whether there would be value in clarifying that this credit applies only to customers taking default service from the relevant utility.
8. **Page 9 – 903.02(k)(3).** Eversource recommends changing “supplied to” to “received by”
9. **Page 9 – 903.02(k)(3).** As with 903.02(j)(3), above, Eversource asks whether there would be value in clarifying that this credit applies only to customers taking default service from the relevant utility.

10. Page 9 – 903.02(k)(4)a. Eversource recommends changing “net electricity exports” to “surplus electricity exported”.

11. Page 9 – 903.02(k)(4)c. Similar to 903.02(r), this provision should also allow a payout of the monetary credit balance on account close-out and not just an annual basis.

12. Page 9 – 903.02(k)(4). It appears there has been a significant omission concerning customers on the alternative net metering tariff. This section should include language identical to that in 903.02(j)(4)(a) and 903.02(j)(4)(b) pertaining to customers on the standard net metering tariff. Without that language, there is an ambiguity in the billing calculations to be performed by the utility.

13. Page 12 – 903.02(r). The final clause, “and no credit shall be given to the customer-generator for any remaining excess generation” is unclear. Under this provision, a customer has terminated service and has been paid for the accumulated balance of any bill credits. Thus, it is not clear what additional credit would remain that could be credited. Eversource recommends revising or deleting that clause.

14. Page 41 – 909.10(a)(4). The proposed language states that the annual report is to contain:

A calculation, with supporting documentation, of the total electricity generated by the host’s facility, the host’s load, the load of each member, and the combined load of all members.

Eversource recommends that this provision be reworded to state that the report will contain:

A calculation, with supporting documentation, of the total electricity generated by the host’s facility, the total net surplus electricity for which the host was compensated under these rules, the total of such compensation received, the host’s load for which it was billed by the utility, the billed load of each member, and the combined billed load of all members.