

STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

ELECTRIC AND NATURAL GAS UTILITIES

Development of a Statewide, Multi-Use Online Energy Data Platform

Docket No. DE 19-197

Petition of the Town of Hanover for Intervention

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission on December 13 in the above-captioned proceeding, N.H. Code Admin. Rules Puc 203.17, and RSA 541-A:32, the Town of Hanover hereby petitions for leave to intervene in this matter. In support of its petition, the Town of Hanover states as follows:

Rule Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32. RSA 541-A:32, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon a showing that the petitioner has “rights, duties, privileges, immunities or other substantial interests” that may be affected by the proceeding, and “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

According to the Order of Notice, this docket concerns the development, implementation, and maintenance of a statewide, multi-use online energy data platform in accordance with RSA 378:50 through :54 (as enacted earlier this year as 2019 N.H. Laws Ch. 286, and as proposed by SB 284); issues relating to privacy policies for customer data in accordance with RSA 363:37 and :38; issues relating to the availability and transmittal of aggregated community-level energy usage data pursuant to RSA 53-E:4; and the question of whether the cost of the platform to be

recovered from customers is reasonable and in the public interest (or, alternatively, whether implementation of the platform should be deferred). For the reasons that follow, these determinations may impact the rights, duties, privileges, immunities, or other substantial interests of the Town of Hanover.

The Town of Hanover is a New Hampshire municipality and was the state's first "Ready for 100" community, a nationwide movement of municipalities committed to achieving use of 100% renewably generated electricity by 2030 and renewably generated heating and transportation fuel by 2030. Hanover adopted this goal on behalf of the entire community and not just as one municipal electricity consumer. As part of that goal, it is critical that the Town have ready access to up-to-date information on types and amounts of electricity consumed within the municipality so that we can track our community's progress. To date, the Town has found this information very difficult to obtain, hence our support for the legislation to create this docket.

The Town of Hanover has 11,300 residents, including residential, municipal, institutional and business customers that are primarily located in Liberty Utilities' service territory, although a small number of residential customers are served by Eversource and the NH Electric Co-op.

As noted above, the Town of Hanover and its individual electricity customers are interested in more carefully tracking their overall electricity usage as well as understanding the sources of that electricity in addition to the emissions impacts of the electricity consumed by customers. To date, the Town has found this information very difficult to obtain, hence our support for the legislation to create this docket. Hanover's goal is to provide support for development of an accessible statewide platform like the platform now available to Vermont electricity customers, the *Community Energy Dashboard*. Residents, business and institutional electricity users of our town will have ready access to their usage data, which will allow them to maximize their use of innovative services. We

also want to insure that their privacy interests are not adversely impacted by insuring that adequate protections are put in place as part of the development of this platform.

While Hanover was the first community in the state to adopt a 100% renewable energy commitment, Concord, Keene, Cornish and Plainfield have since followed suit with adoption of the Ready for 100 goals. An additional subset of communities such as Lebanon, Nashua, Bedford, Warner, Bristol, Harrisville, Cheshire County and the Monadnock Energy Hub also have commitments towards clean energy. As entities seek to move forward with established local commitments, the difficulty of accessing energy data, most of which is from national, state, or utility specific data sets, creates an enormous gap in the ability of communities to advance their deep decarbonization and renewable energy goals in a timely, cost-effective manner. Having an energy data platform, in fact, reduces costs to communities and the utilities, lowering the number of data requests, and standardizing the format of the data. We know because in Hanover, it took us six months working with Liberty Utilities to gain access to our own energy data, and that was with permission of the account holders and the help of a hired consultant. Communities, municipalities, and cities across the US are experiencing these same problems to varying degrees, with many recreating the wheel each time; an onerous, timely, costly, and isolating endeavor.

This further presents a question of equity. Communities who can afford the cost, have staff to manage, and can convene the requisite expertise will be the communities that are able to advance the clean energy economy in NH. Those who can't, will be left behind. Just and equal access to energy data, at a level of fidelity that enables community choice that is accessible and transparent, and is updated on a regular basis is key. Some states, like Vermont, and some communities, like the City of Austin, TX, are leaders in providing transparent, timely, access to energy data. Meanwhile other states, such as New Hampshire, have significant barriers including outdated and incomplete publicly available data, with coverage only in certain population centers. With a strong utility partnership, we can work together to ensure customer privacy concerns are addressed, and to minimize – not increase


– costs to rate payers. As such, Hanover is partnering with the Revers Center for Energy at the Tuck School of Business on a grant by the Arthur L. Irving Institute for Energy and Society, to serve as a pilot community for the development of a Community Energy Dashboard, like VT’s, as a test case for the cost effectiveness of having a centralized and transparent platform. With Dartmouth’s partnership and funding, we can expand the community energy dashboard in a way that facilitates broader community access and expands the data collected, so as to include population health, education, income, and other key parameters that link energy choices and cost, with overall economic benefits. Experts leading the effort include April Salas, who led the US Department of Energy’s efforts to develop a national energy infrastructure mapping tool, as well as, directing the White House’s Quadrennial Energy Review of the US Electricity Sector. With the support of this bill, the customers that will benefit from such a platform include:

- Town Planners, Energy Committees (mostly volunteers), and other local officials
- State regulators
- Regional Planning Commissions (RPCs)
- Utilities (Distribution, Transmission, and Efficiency) and their customers
- State and local policymakers, implementers, and funders
- Energy Businesses
- Other Businesses, and organizations committed to efficiency and renewable energy
- Local and regional community power programs

WHEREFORE, the Town of Hanover respectfully requests that this honorable Commission:

- A. Grant the petition for intervention, and
- B. Provide any other such relief as it deems appropriate.

Sincerely,



Julia N. Griffin
Town Manager
Town of Hanover

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January 23, 2020

Certificate of Service

I hereby certify that a copy of this Petition for intervention was provided via electronic mail to the individuals included on the Commission's service list for this docket.



Julia N. Griffin