

# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** May 11, 2021  
**AT (OFFICE):** NHPUC

**FROM:** Elizabeth Nixon, Utility Analyst, Electric Division

**SUBJECT:** Rule Waiver Request  
Net Metering Avoided Cost Calculation

**TO:** Dianne Martin, Chairwoman  
Kathryn Bailey, Commissioner  
Debra Howland, Executive Director

**CC:** Tom Frantz, Director, Electric Division  
Rich Chagnon, Assistant Director, Electric Division  
David Wiesner, Director, Legal Division

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### Summary

Pursuant to Puc 903.02(o)(1), the New Hampshire Public Utilities Commission (Commission) must issue a net metering avoided cost calculation by May 15 for the previous year ending on March 31. Pursuant to Puc 903.02(o)(7)a., if actual hourly generation output data from photovoltaic (PV) systems is on file with the Commission by April 5, the hourly average of all the actual generation output data may be used in the net metering avoided cost calculation; otherwise, modelled hourly PV data must be used. Commission Staff (Staff) requests a rule waiver pursuant to Puc 201.05 to extend the filing date for the actual verifiable hourly PV generation output data, because actual hourly generation output data from PV systems operating in New Hampshire provide for a more accurate calculation reflecting the avoided costs for net-metered PV systems, but such data was not available until May 10.

### Background

Pursuant to Puc 903.02(o)(1), on or before May 15, the Commission must issue the net metering avoided cost rates for customer-generators with surplus net-metered generation under the standard net metering tariff. For PV systems, the Commission may use verifiable actual hourly generation output data if filed with the Commission prior to April 5; otherwise, the Commission must use modelled PV data. See Puc 903.02(o)(7). On September 14, 2020, revised rules became effective that changed the deadline for posting of the net metering avoided cost calculation from April 15 to May 15, to allow for additional time to process and verify the large amount of data related to the calculation. The revised rules did not, however, extend the timeframe for receiving actual PV generation output data.

Given that the generation output data contains voluminous amounts of data for each system, it is difficult to obtain, process, and verify the data only five days after the end of the

applicable period. In addition, a weekend was included in that five-day period this year. This year Staff also found it challenging to obtain actual PV generation data. In the past, Clean Energy New Hampshire members and other solar installers had provided such data. This year Staff had to contact Public Service Company of New Hampshire d/b/a Eversource Energy and New Hampshire Electric Cooperative to obtain relevant data. After receiving the requested data, Staff then needed to review the data and verify it. Staff received revised data on May 10.

Staff strives to use actual generation data instead of modelled data for the avoided cost calculation to provide for a more accurate reflection of net-metered generation and costs. As noted in Staff's rule waiver request last year in Docket DE 20-093, the modelled data for the peak hour in 2019 did not show any generation whereas the actual data confirmed that generation had occurred. As such, use of the modelled data would have resulted in a much different avoided cost calculation than use of the actual data. In light of those significant differences in data sources, Staff endeavors to use actual data whenever possible.

#### Rules Waiver Request

Pursuant to Puc 201.05(a), the Commission may waive a rule if it finds that:

- (1) The waiver serves the public interest; and*
- (2) The waiver will not disrupt the orderly and efficient resolution of matters before the commission.*

In determining the public interest, under Puc 201.05(b), the Commission shall waive the rule provision if:

- (1) Compliance with the rule would be onerous or inapplicable given the circumstances of the affected person; or*
- (2) The purpose of the rule would be satisfied by an alternative method proposed.*

Staff believes that the public interest would be served by an alternative method of compliance with the rules through extension of the applicable deadline to permit additional time to obtain and verify actual PV system data. Staff notes that, after requesting a rule waiver last year for deadlines related to the net metering avoided cost calculation, the Commission revised the posting deadline for the net metering calculation but did not revise other deadlines, including that for receiving actual generation data.

Staff therefore recommends that the deadline for receipt of actual PV system generation data be extended to May 10 to allow for the usage of actual system data.

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