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August 24, 2022

Via electronic mail only

Daniel Goldner, Chair
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 22-022 Request for Approval of Keene Community Power Aggregation Plan – City of Keene
Comments of Public Service Company of New Hampshire d/b/a Eversource Energy

Chair Goldner:

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) provides the following comments on the revised Community Power Aggregation Plan filed by the City of Keene in this docket on August 3, 2022 (“Keene Plan”), consistent with the requirement of RSA 53-E:7, II requiring utility comments on such a plan be filed within 21 days of submission of that plan.

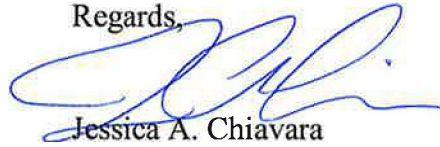
Eversource has reviewed the Keene Plan and found it to be consistent with the proposed Puc Chapter 2200 rules, which have not yet taken effect, but were approved by the Commission on July 27, 2022. The Company would like to note that it is working diligently to make the requisite modifications to its enterprise IT and billing systems to be able to comply with all data request provisions in the proposed Puc 2200 rules that the Company is able to comply with by the time the rules become effective. However, some of the modifications required entail quite extensive and labor intensive efforts, and one of the Eversource billing systems is 37 years old. For these reasons the Company would like to note that it may have to seek partial or complete rule waivers for certain provisions, particularly with regard to the time requirements to provide certain data. Eversource will assess what waivers will be needed when the Puc 2200 rules become effective and file them on or shortly after the effective date of the rules. Those waiver requests will be filed to Docket No. DRM 21-142, as the waivers requested would need to apply to all Community Power Aggregation Plans.

As a procedural matter, Eversource requests that on a moving forward basis when Community Power Aggregation Plans are filed with the Commission, that the filing municipality or county copy counsel for Eversource on the filing with the Commission, rather than or in addition to emailing the Company separately, so that the Company is put on notice on the same day that the filing is made with the Commission so there is awareness that the 21-day comment period has begun. The Company also requests that the following email addresses be added to the service list for this docket: nhregulatory@eversource.com, jessica.chiavara@eversource.com,

Sandra.gagnon@eversource.com, SupplierServicesNH@eversource.com, and Daryush.donyavi@eversource.com.

Following the March 17th letter of the Commission these comments are being filed electronically only; paper copies will not follow. If you have any questions, please contact me. Thank you for your assistance with this matter.

Regards,

A handwritten signature in blue ink, appearing to read 'J. Chiavara', is positioned above the printed name.

Jessica A. Chiavara

Senior Counsel, Eversource Energy

cc: 22-022 Service List