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March 24, 2023

Via Electronic Mail

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429
ClerksOffice@puc.nh.gov

***Re: DE 23-028 Request for Approval of Allenstown Community Power Electric Aggregation Plan
Comments of New Hampshire Electric Cooperative***

Dear Chairman Goldner:

New Hampshire Electric Cooperative (“NHEC” or “the Cooperative”) provides the following comments on the Allenstown Community Power Electric Aggregation Plan (“the Aggregation Plan”) filed by the Town of Allenstown in this docket on March 13, 2023, consistent with the requirement of RSA 53-E:7, 11 and the March 14, 2023 Order of Notice in this docket requiring comments on such a plan be filed within 21 days of submission of that plan.

The Cooperative fully supports the development of Community Power Aggregations (“CPAs”) and believes that they can be a powerful tool for providing “access to competitive markets for supplies of electricity and related services” and for encouraging “voluntary, cost effective and innovative solutions to local needs” as articulated in the statement of purpose in RSA 53-E:1. The Cooperative also strongly supports the ability of our members to access competitive supply options and was an early adopter of retail choice in New Hampshire. The Cooperative currently provides service to 307 accounts in the Town of Allenstown.

The Cooperative is not rate-regulated by the New Hampshire Public Utilities Commission (“the Commission”) and is not subject to the Puc 900 Net Metering rules. In addition, the Cooperative was not subject to RSA 378:50-54, the Multi-Use Energy Data Platform.

To serve our members, the Cooperative utilizes products and systems provided by National Information Solutions Cooperative (“NISC”) for member billing, information management, meter data management (“MDM”), accounting, engineering, and operational support. NISC provides similar services to over 900 electric cooperatives and public power members, five of which have customized their account management and billing software and enabled Electronic Data Interchange (“EDI”) processing to accommodate retail choice, and none of which provide municipal aggregation.

As a result, the Cooperative has filed a Petition for Waiver of Portions of Puc 2200 Rules, which is currently pending before the Commission in docket DE 22-080. The Cooperative has also filed a Purchase of Receivables program which is currently pending before the Commission in docket DE 23-001.

In reviewing the Aggregation Plan filed by the Town of Allenstown, NHEC noted some potential issues. In Section III.d. Reliability, the plan “commits the Competitive Supplier to provide all-requirements power supply” and includes “transmission services.” Pursuant to RSA 53-E:4,III: “Transmission and distribution services shall remain with the transmission and distribution utilities...”

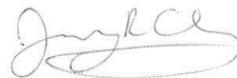
NHEC also notes that section X. Rights and Responsibilities of Program Participants states that: “All participants will have the right to opt out of the Program at any time without charge.” Customers who wish to opt out must provide adequate notice pursuant to Puc 2204.05(g), which states that: “Customers enrolled in a community power aggregation plan operated on an opt-out basis may elect to transfer to utility provided default service or to a competitive electric power supplier with adequate notice in advance of the next regular meter reading by the distribution utility...”

In addition, NHEC notes that the plan appears to use consolidated billing for all accounts. Net metering consolidated billing rate designs are subject to limitations with the current New Hampshire EDI standard.

Assuming waivers affirming the Cooperative’s deregulated rate structures, adherence to the current EDI standard, billing and metering system limitations, and realistic deployment timelines, the Cooperative does not have any other significant concerns with Allenstown’s plan.

If you have any questions, please do not hesitate to contact me at clarkj@nhec.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremy Clark', written in a cursive style.

Jeremy Clark
Financial Planning, Analysis, and Rates Manager

cc: Service List