



Warner Community Power Electric Aggregation Plan

As Approved by the Warner Select Board on January 31, 2023

As Approved by the Warner Town Meeting on March 29, 2023

Table of Contents

I. OVERVIEW OF WARNER COMMUNITY POWER.....	3
A. PURPOSE OF THIS PLAN.....	3
B. CUSTOMER NOTIFICATION AND ENROLLMENT PROCESS	4
C. MEMBERSHIP IN THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE	5
D. APPROVAL PROCESS AND NEXT STEPS	5
II. WARNER COMMUNITY POWER GOALS, OBJECTIVES, AND REQUIREMENTS	7
A. WARNER COMMUNITY POWER PRINCIPLES	7
B. WARNER COMMUNITY POWER OBJECTIVES.....	7
C. NEAR-TERM OPERATIONAL REQUIREMENTS	8
III. ELECTRIC AGGREGATION PLAN STATUTORY REQUIREMENTS	10
A. ORGANIZATIONAL STRUCTURE OF THE PROGRAM	10
B. METHODS OF ENTERING INTO AND TERMINATING AGREEMENTS.....	10
C. OPERATION AND FUNDING	10
D. RATE SETTING, COSTS, ENROLLMENT PROCESS, AND OPTIONS	11
E. RIGHTS AND RESPONSIBILITIES OF PROGRAM PARTICIPANTS.....	13
F. NET METERING AND GROUP NET METERING POLICIES	13
G. ENSURING DISCOUNTS FOR ELECTRIC ASSISTANCE PROGRAM PARTICIPANTS	14
H. TERMINATION OF THE PROGRAM.....	15
ATTACHMENT 1: THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE	16
GOVERNANCE STRUCTURE	16
MEMBER SERVICE TERRITORY.....	18
ORGANIZATIONAL CAPACITY.....	19
STAFFING STRATEGY	20
REGULATORY AND LEGISLATIVE ENGAGEMENT	20
PURPOSE, MISSION, VALUES & POWER ENTERPRISE OBJECTIVES	21
COALITION ENERGY PORTFOLIO RISK MANAGEMENT, RATES, AND RESERVES POLICIES	22
MEMBER COST SHARING AGREEMENT	23
ATTACHMENT 2: WARNER COMMUNITY POWER NET METERING, GROUP NET METERING AND LOW-MODERATE INCOME SOLAR PROJECT OPPORTUNITIES.....	24
ATTACHMENT 3: HOW LOAD SERVING ENTITY SERVICES WILL BE IMPLEMENTED	28
RESPONSIBILITIES OF THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE (CPCNH)	29
RESPONSIBILITIES OF THE TOWN OF WARNER	31
ATTACHMENT 4: CUSTOMER DATA PROTECTION PLAN	33
RESPONSIBILITIES OF THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE (CPCNH)	33
CPCNH REQUIREMENTS TO ACCESS AND USE OF INDIVIDUAL CUSTOMER DATA	35
RESPONSIBILITIES OF THE TOWN OF WARNER	37
ADDITIONAL REFERENCES: STATUTORY AND REGULATORY REQUIREMENTS.....	38
STATUTORY REQUIREMENTS FOR COMMUNITY POWER AGGREGATORS & SERVICE PROVIDERS.....	38
ADDITIONAL REQUIREMENTS SPECIFIC TO BROKERS & COMPETITIVE SUPPLIERS	39
ADDITIONAL REQUIREMENTS FOR THE MULTI-USE ENERGY DATA PLATFORM	40

I. Overview of Warner Community Power

New Hampshire's updated Community Power law ([RSA 53-E](#), as amended by SB 286, effective October 1, 2019) is a bipartisan policy designed to further enhance the economic efficiency of our electric power industry. The Legislature's intent in enacting RSA 53-E is to *"encourage voluntary, cost effective and innovative solutions to local needs with careful consideration of local conditions and opportunities."*

To achieve this goal, RSA 53-E authorizes local governments (cities, towns, and counties) to launch Community Power programs that:

- Provide electricity supply service to residents and businesses, who are notified and enrolled on an "opt-in" customer choice or "opt-out" default service basis and may thereafter leave or rejoin the program (by switching suppliers in advance of their next billing cycle date);
- Procure a reliable supply of electricity, inclusive of Renewable Portfolio Standard requirements, with the option to participate directly in the ISO New England wholesale market;
- Offer a range of innovative services, products, new Net Energy Metering supply rates, and local programs to participating customers;

Under this program, distribution utilities such as Eversource in Warner will continue to deliver power to all customers, regardless of whether they are supplied electricity by new Community Power programs or Competitive Electric Power Suppliers (or have chosen to switch back to utility-provided default service).

Warner's Town Select Board voted to explore our Town's options under the statute and approved a Warner Community Power Committee to report back with a recommendation and plan, if desirable, to move forward with Warner Community Power. The Select Board also authorized the Town to become a member of the Community Power Coalition of NH (CPCNH or "the Coalition"). CPCNH is a state-wide coalition of municipalities which are developing their own local community power plans.

This Plan outlines the rationale for implementing Warner Community Power, describes the details of how it will operate, and ensures compliance with applicable law and regulation.

A. Purpose of this Plan

The Community Power Committee was tasked by the Select Board to prepare this Electric Aggregation Plan, which sets forth Warner's policy goals for our Community Power program, summarizes program governance and implementation processes, and commits Warner Community Power to comply with applicable statutes and regulations in terms of:

- Providing universal access, reliability, and equitable treatment of all classes of customers subject to any differences arising from varying opportunities, tariffs, and arrangements between different electric distribution utilities in their respective franchise territories; and
- Meeting, at a minimum, the basic environmental and service standards established by the Public Utilities Commission and other applicable agencies and laws and rules concerning the provision of service under Community Power.

This plan does not otherwise commit Warner to any defined course of action, including participation in the Coalition for the purposes of launching the program, and does not impose any financial commitment on the Town.

The Select Board retains the power to contract for all required program services and electricity supplies, to set rates, and to pursue related projects independently of the Coalition.

The primary goal of Warner Community Power is to give Warner residents a reliable and affordable option for default electricity supply in addition to Eversource regulated default energy supply service, which is not necessarily the most cost-effective option for electricity supply.

It is important to also know what our Warner Electric Aggregation Plan **does not** do:

- It does not replace Eversource as the default distribution utility. The Warner Community Power Program covers only the portion of Eversource's bill – typically about 50% – for energy supply cost. Eversource will continue to provide, and bill for, its distribution costs. Eversource will continue to be responsible for bringing reliable power to our homes and businesses, including resolving outages as the result of storms or other upsets.
- It does not require anyone to participate in the plan. At least 30 days before the program launches, all current Eversource default service customers will be notified and given simple, fast ways to opt out if they choose to remain under Eversource default supply.
- Participation in the program will not disqualify residents from participation in the state's Electric Assistance Program. Electric Assistance Program participants will continue to receive discounts if their energy supplier is the Warner Community Power Program.
- Customers with on-site power generation facilities – solar arrays, for example – will continue to sell excess generation back to the New England Power Grid.
- There is no cost to taxpayers in this program. Its direct and indirect costs will be paid by Warner Community Power customers through revenues generated from the sale of electricity supply.

A “Yes” vote by the Select Board or Town Meeting attendees will not obligate anyone in Warner to purchase energy from the Warner Community Power program. As noted above, anyone who wants to stay with Eversource default service can easily do so. Customers are always free to choose to purchase power from a competitive electricity supplier. A “No” vote closes the door to anyone who does want to participate.

B. Customer Notification and Enrollment Process

Prior to launch of Warner Community Power, all eligible customers will be mailed notifications and provided the opportunity to “opt-out” or “opt-in” to the program, depending on whether they currently are on default service provided by Eversource or take service from a Competitive Electric Power Supplier:

- Customers already served by Competitive Electric Power Suppliers will be notified and may request to “opt-in” to the program; and
- Customers currently on default energy service provided by Eversource will be notified, provided the opportunity to decline participation (“opt-out”), and thereafter transferred to Warner Community Power if they do not opt-out.

Notifications will be mailed to all electric customers at least 30 days in advance of program launch and will include the initial fixed rate for the program's default service compared with the Eversource rate. Mailers will provide instructions for customers to decline participation (for example, by returning a postcard, calling a phone number or using a web portal).

After the launch of Warner Community Power, any new customers starting service within the Town will be given a similar opt-out notice and will be transferred onto default service provided by the program, unless they choose to take energy service from Eversource or a Competitive Electric Power Supplier.

All customers on Warner Community Power default service will remain free to switch back to Eversource or to take energy service from a Competitive Electric Power Supplier.

C. Membership in the Community Power Coalition of New Hampshire

Warner is a member of the non-profit [Community Power Coalition of New Hampshire](#) (“the Coalition”), a joint powers agency authorized under RSA 53-A (“*Agreements Between Governments: Joint Exercise of Powers*”). A joint powers agency is one where two or more entities with separate governing boards, such as towns and cities, cooperate to offer special services to all member communities. The Coalition provides comprehensive services for authorizing, launching and operating Community Power programs across all member municipalities.

The Coalition was created so that towns, cities, and counties across New Hampshire could:

1. Access the resources and support required to streamline the process of establishing a Community Power Committee, drafting an Electric Aggregation Plan and approving a new Community Power program.
2. Jointly solicit and contract for third-party services and staff support to launch and operate Community Power programs, without requiring any upfront costs or imposing any financial liabilities on participating communities.
3. Participate in joint power solicitations and local project development opportunities.

The Coalition’s joint powers agency governance model and competitive business model have been designed in accordance with energy industry best practices to ensure that participating Community Power programs benefit from transparent governance and high-quality services — so that all participating communities are able to achieve the full scope of their local energy policy goals. The Coalition is governed “*for communities, by communities*” under a voluntary membership structure, to provide competitive electricity service statewide. The Coalition strengthens the ability of communities to coordinate effectively on public advocacy issues.

In 2021 the Warner Select Board agreed to join Community Power Coalition of New Hampshire. The Community Power Committee agrees that our membership in the Coalition is key to getting economies of scale in purchasing energy, sharing indirect costs for plan administration, contracting with vendors who have deep expertise in the energy industry, and providing flexibility to customize our offerings, such as multiple options for renewable content. Details of our membership with CPCNH are contained in [Attachment 1](#) of this plan.

D. Approval Process and Next Steps

Since 2021, Warner’s Community Power Committee has researched Community Power options, assessed relevant town objectives documented in local policy and in the Master Plan, surveyed public opinion relative to energy and Community Power, networked with numerous other local committees from across the state, and compiled its many learnings to inform this Electric Aggregation Plan.

The Town of Warner held two public hearings on the Electric Aggregation Plan on October 25 and November 22, 2022 to support public education and to collect feedback and input on the contents of the draft plan.

The Town of Warner’s appointees to the Community Power Coalition of New Hampshire’s Board of Directors have simultaneously participated in the oversight and start-up activities of the agency as it has solicited for and contracted with service providers to launch and operates participating Community Power programs.

The Community Power Committee has determined that this Plan satisfies applicable statutory requirements and is in the best, long-term interest of the Town and its residents, businesses, and other

electricity customers. Warner will submit this final Electric Aggregation Plan to the Public Utilities Commission for review and approval as per RSA 53-E:7, II.

Adoption of this Plan by majority vote at Town Meeting will establish Warner Community Power as an approved electric aggregation program with statutory authorities defined under RSA 53-E:3, to be exercised with due oversight and local governance, as described herein, and will authorize the Select Board to provide, broker or contract for the services necessary to launch and operate Warner Community Power.

Customers who choose not to participate in Warner Community Power shall not be responsible for any costs associated with the program, apart from incidental costs incurred by the Town prior to the point at which the program starts producing revenue from participating customers (for example, contract review by legal counsel, but not any operational or capitalized costs of the program).

II. Warner Community Power Goals, Objectives, and Requirements

Warner Community Power affords the Town the capacity and flexibility to realize and build on our policies pertaining to energy, economic development, and infrastructure.

A. Warner Community Power Principles

Because this is a new program, decisions have to be made and approved by the Town and its residents about how we want Warner Community Power to work in the best interests of residents and businesses in our town.

After reviewing a number of sources of information and sentiment – an opinion survey, information exchange in various venues, review of Community Power Plans filed by other towns and cities and discussion with the statewide Community Power Coalition of New Hampshire – the Warner Community Power Committee agreed on principles that guided our recommendations. These principles are:

- All Warner electric customers should have access to rates equal to or lower than Eversource default service rates. If the program cannot at least meet Eversource’s rate at launch date, it will not launch.
- Pricing should be as stable as possible and not fluctuate widely as Eversource default prices do, as a result of its short interval contracting practices.
- Warner Community Power will offer the lowest available price as its default rate. In addition, Warner electric customers should also have the option to choose 100% “clean” renewable energy sources, or a 50/50 hybrid of the lowest rate and 100% clean energy.
- Implementation and ongoing administration of the program should require minimal local resources.

B. Warner Community Power Objectives

Warner Community Power will be guided by the following objectives:

- **Competitive Rates:** provide residential default rates that are lower than or competitive with those offered by Eversource;
- **Expanded Choices and Enhanced Customer Focus:** offer optional products, such as supply options with higher and lower levels of renewable energy and time-varying rates that enable the intelligent use of customer energy technologies to reduce energy expenditures and carbon emissions on a voluntary basis;
- **Fiscal Stability & Financial Reserves:** maintain a reserve fund to ensure that the program remains able to offer competitive rates as market prices fluctuate over time;
- **Consumer Protections:** ensure that the contracts entered into on behalf of customers are fair and represent the interests of Warner and its residents;
- **Public Advocacy:** represent the interests of Warner and the program’s customers at the Legislature, Public Utility Commission and other relevant agencies on matters pertaining to Community Power and towards creating a more modern electric grid;
- **Cleaner, Local Power:** prioritize the development of cost-effective projects to supply an affordable energy portfolio that prioritizes the use of in-state and local renewable energy;
- **Regional Collaborations:** collaborate with municipalities, other Community Power programs and government agencies to jointly develop cost-effective local renewable generation and storage projects, electric vehicle transit fleets and charging corridors, and other clean energy infrastructure developments;

Through strategies and initiatives like these, enabled by the scope and scale of service provided through the Coalition, Warner Community Power intends to:

- Create savings and new value for customers; and
- Support the vitality and growth of local businesses.

These objectives are essential to our continued success as a vital, sustainable community.

C. Near-Term Operational Requirements

While many of the broader benefits Warner Community Power intends to create for customers and the Town will be developed over time, the program’s immediate objective is to offer competitive default supply rates compared to Eversource while accruing a reserve fund sufficient to ensure long-term financial stability, and additionally offering voluntary products that retail customers may opt-up to receive as well as Net Energy Metering supply rates that allow customer generators to participate in the program.

Warner Community Power will need to balance customer rate levels, renewable power content and the accrual of program reserves to meet these objectives.

i. Performance Relative to Utility Default Service and Net Energy Metering Generation Rates

Compensation to customer generators under Net Energy Metering generation rates, the timing of the program’s rate setting decisions and, to a certain degree, the procurement of electricity will need to take into account Eversource’ tariffs, processes and timing in regard to these activities. Refer to [Attachment 2](#) for additional documentation and discussion of these factors.

ii. Customer Rates and Products

The table below provides an illustrative example of a default service product and optional rates that could be offered to customers:

<u>PRODUCT</u>	<u>CONTENT</u>	<u>WARNER ELECTIONS</u>
Granite Basic	Minimum RPS Content (23.4%)	Default, opt-down/in, or N/A
Granite Plus	33% Renewable or Carbon Free	Default, opt-up/in, or N/A
Clean 50	50% Renewable or Carbon Free	Opt-up/in or N/A
Clean 100	100% Renewable or Carbon Free	Opt-up/in or N/A

The products that Warner Community Power initially offers to customers, and the rates charged for each product, will be refined and finalized in advance of program launch.

Warner Community Power will only launch if it is able to offer residential default rates that are initially lower than, or competitive, with those offered by Eversource; thereafter, the program will strive to maintain competitive rates for all default service customers on an overall annual basis, as well as

customers who opt-in or opt-up to receive optional retail products, while working to achieve the program's goals that may evolve with input from residents and the Select Board.

If this plan is fully approved, the Select Board, in coordination with advisory support from the Warner Community Power Committee, will authorize the Town Manager to contract with CPCNH for the necessary services and power supplies to implement and operate the program, set customer rates prior to program launch and continue to provide oversight over the program thereafter.

iii. Renewable Portfolio Standard Requirements

New Hampshire's Renewable Portfolio Standard (RPS) requires all electricity suppliers to obtain Renewable Energy Certifications (RECs) for four distinct "classes" of renewables, each distinguishing between different technologies and dependent upon the year that the generators came online.

For 2022, Eversource and other electricity suppliers are required to include 22.5% renewable energy in their energy supply. This minimum compliance requirement will increase incrementally to 25.2% by 2025 and remain fixed thereafter, absent an increase in the RPS.

Warner Community Power will procure voluntary renewables in excess of the RPS minimum requirements from eligible resources under the NH RPS (as defined at <https://www.cpcnh.org/renewable-portfolio-standard>). Additionally, the program could prioritize including as much renewable energy sourced from generating resources located in New Hampshire and New England as possible.

III. Electric Aggregation Plan Statutory Requirements

The following requirements for this Electric Aggregation Plan, in compliance with RSA 53-E:6, are addressed below:

- A. Organizational structure of the program;
- B. Methods of entering into and terminating agreements;
- C. Operation and funding;
- D. Rate setting, costs, and customer enrollment process;
- E. Rights and responsibilities of program participants;
- F. Net metering and group net metering policies;
- G. Ensuring discounts for Electric Assistance Program participants; and,
- H. Termination of program.

A. Organizational Structure of the Program

Upon approval of this plan, Warner Community Power will be authorized to provide electricity and other related services to participating residents, businesses, and other customers in the Town.

The Select Board will oversee the program and has overall governance authority. Decisions regarding Warner Community Power, such as updating program goals, adoption of Energy Risk Management and Financial Reserve policies and approval of customer rates, will be made at duly noticed public meetings and with advisory support from the Community Power Committee.

The Select Board has appointed a primary and alternate representative to participate in the Community Power Coalition of New Hampshire and to serve on the agency's Board of Directors and may delegate certain decision-making authorities to them to carry out their responsibilities at the Select Board's direction.

In general, Warner's representatives will be expected to help oversee the start-up and operation of the agency, provide input regarding the Coalition's public advocacy on matters of policy and regulation, provide direction to the Coalition's staff and vendors as the agency's operations and customer services evolve over time, and report back regularly regarding the performance of Warner Community Power and on any matter that warrants attention or requires action by the Select Board.

Additionally, the Select Board may direct the Community Power Committee to continue to hold meetings for the purpose of providing community input and advisory support regarding the program.

B. Methods of Entering into and Terminating Agreements

This Electric Aggregation Plan authorizes the Select Board to negotiate, enter into, modify, enforce, and terminate agreements as necessary for the implementation and operation of Warner Community Power.

C. Operation and Funding

Warner Community Power will contract with qualified vendors and credit-worthy suppliers to provide the services, credit support and electricity required to launch and operate the program.

This plan assumes, but does not require, Warner to participate fully in the Coalition and thereby contract for operational services jointly with other participating Community Power programs.

The Coalition's third-party contractors will be expected to fund the upfront cost of implementing Warner Community Power, the expense of which will be amortized and recovered in the program's rates and charges to participating customers. The program may also seek opportunities to apply for grant funding, either independently or through the Coalition.

Services provided by third-party entities required to launch and operate the program may include portfolio risk management advisory services, wholesale Load Serving Entity (LSE) services, financial services, electronic data interchange (EDI) services with the utility, and customer notification, data management, billing, and relationship management (e.g., call center, website, etc.) services. Additional information on how Warner Community Power will implement Load Serving Entity (LSE) services is found in [Attachment 3, How Load Serving Entity Services will be Implemented](#).

Additional support services such as management and planning, budgeting and rate setting, local project development support, regulatory compliance, and legislative and regulatory engagement services (on matters that could impact the program and participating customers) will be addressed through a combination of staff support and third-party services.

Warner Community Power will provide "all-requirements" electricity supply for its customers, inclusive of all of the electrical energy, capacity, reserves, ancillary services, transmission services (to the extent not provided through Eversource), transmission and distribution losses, congestion management, and other such services or products necessary to provide firm power supply to participants and meet the requirements of New Hampshire's Renewable Portfolio Standard. (Refer to <https://www.cpcnh.org/renewable-portfolio-standard> for details regarding the requirements of Renewable Portfolio Standard statute, RSA 362-F.)

D. Rate Setting, Costs, Enrollment Process, and Options

Customers who choose not to participate in Warner Community Power shall not be responsible for any costs associated with the program, apart from incidental costs incurred by the Town prior to the point at which the program starts producing revenue from participating customers (for example, contract review by legal counsel, but not any operational or capitalized costs of the program).

i. Rate Setting and Costs

Warner Community Power will only launch if it is able to offer residential default rates that are initially lower than or competitive with those offered by Eversource; thereafter, the program will strive to maintain competitive rates for all default service customers on an overall annual basis, as well as customers who opt-in or opt-up to receive optional retail products, while working to achieve the program's goals (as set forth in this Electric Aggregation Plan and modified from time to time at the direction of the Select Board).

The Select Board will adopt Energy Risk Management and Financial Reserve policies to govern the program's power procurement and rate-setting decisions. Rates will be set at a level such that revenues from participating customers are projected to meet or exceed the ongoing operating and capital costs of the program.

To ensure the financial stability of Warner Community Power, a portion of revenues will be deposited in a financial reserve account. In general, the fund will be restricted for uses such as:

- **In the near-term**, maintain competitive customer rates in the context of price fluctuations in the electricity market and other factors;
- **In the medium term**, as collateral for power purchase agreements (including for the development of

new renewable and battery storage projects), and for additional credit enhancements and purposes that lower the program's cost of service; and

- **Over the long term**, may also be used to directly fund other program financial requirements, or to augment the financing for development of new projects and programs in the later years of the program, subject to the Select Board's approval.

As required by law, the program will ensure the equitable treatment of all classes of customers, subject to any differences arising from varying opportunities, tariffs, and arrangements between different electric distribution utilities in their respective franchise territories.

In other words, customers will be treated the same based on their circumstances. For example, any customers that opt-in after being offered the opportunity to participate during the initial enrollment period may be offered rates that reflect how market prices have changed in the intervening period.

Changes to the program's default service rates shall be set and publicly noticed at least 30 days in advance of any rate change.

ii. Enrollment Process and Options

Warner Community Power intends to launch on an opt-out basis, providing an alternative default service to the utility provided default service rate. After approval of this Electric Aggregation Plan and before the launch of Warner Community Power, all customers in the Town will be sent notifications regarding the program and offered the opportunity to participate:

- **Customers currently on default service provided by Eversource** will be sent "opt-out" notifications — describing the program, its implications for the Town, the rights and responsibilities of customers, and program rates and charges — with instructions on how to decline participation, and thereafter be transferred to Warner Community Power if they do not opt-out of the program prior to launch.
- **Customers already served by Competitive Electric Power Suppliers** will receive "opt-in" notifications describing the program and may request to opt-in to the program.

If Eversource has not fully implemented Public Utilities Commission rules and procedures governing Community Power Aggregation service, certain groups of customers on default service provided by Eversource may need to be offered service on an opt-in basis, and/or offered service on an opt-out basis at a future date. For example, if Eversource is unable to reliably provide Warner Community Power with the data on customer-generators necessary to offer Net Energy Metering (NEM) rates and terms, then Warner Community Power may initially choose to not enroll customer-generators on an opt-out basis, as doing so could risk negatively impacting NEM customer billing and crediting procedures.

Customers will be notified through a mailing, which will be posted not less than 30 days prior to the enrollment of any customers. All information will be repeated and posted at the Town's Community Power website. A public information meeting will be held within 15 days of the notification to answer program questions or provide clarification.

Optional products, such as increased renewable power content in excess of the Renewable Portfolio Standard (RPS) requirements and other energy services, including time varying rates, may be offered on an opt-in basis.

After launch and in accordance with any applicable rules and procedures established by the Public Utilities Commission, new customers will be provided with the default service rates of Eversource and Warner Community Power and will be transferred onto Warner Community Power's default service unless they choose to be served by Eversource or a Competitive Electric Power Supplier.

Customers that request to opt-in to the program may do so at the discretion and subject to the terms of Warner Community Power.

Residents, businesses, and other electricity customers may opt-out of participating in Warner Community Power default service at any time, by submitting adequate notice in advance of the next regular meter reading by Eversource (in the same manner as if they were on utility provided default service or as approved by the Public Utilities Commission).

Customers that have opted-in to an optional product offered by Warner Community Power may switch back to the Eversource or to take service from a Competitive Electric Power Supplier subject to any terms and conditions of the optional product.

E. Rights and Responsibilities of Program Participants

All participants will have available to them the customer protection provisions of the law and regulations of New Hampshire, including the right to question billing and service quality practices.

Customers will be able to ask questions and register complaints with the Town, Eversource and the Public Utilities Commission.

Warner Community Power shall maintain the confidentiality of individual customer data in compliance with its obligations as a service provider under [RSA 363:38](#) (privacy policies for individual customer data; duties and responsibilities of service providers) and other applicable statutes and Public Utilities Commission rules. Individual customer data includes information that singly or in combination can identify that specific customer including the individual customers' name, service address, billing address, telephone number, account number, payment information, and electricity consumption data. Such individual customer data will not be subject to public disclosure under RSA 91-A (access to governmental records and meetings). Suppliers and vendors for Warner Community Power will be contractually required to maintain the confidentiality of individual customer data pursuant to RSA 363:38, V(b). [Attachment 4, Customer Data Protection Plan](#), details the reasonable security procedures and practices that the Town and Warner Community Power will employ to protect individual customer data from unauthorized access, use, destruction, modification, or disclosure. The attachment describes Customer Data Protection practices that are mandated by state statute and broadly used in the electricity industry.

Aggregate or anonymized data that does not compromise confidentiality of individual customers may be released at the discretion of Warner Community Power and as required by law or regulation.

Participants will continue to be responsible for paying their bills. Failure to do so may result in a customer being transferred from Warner Community Power back to Eversource (the regulated distribution utility and provider of last resort) for default energy service, payment collections and utility shut offs under procedures subject to oversight by the Public Utilities Commission.

F. Net Metering and Group Net Metering Policies

Under the net metering process, customers who install renewable generation or qualifying combined heat and power systems up to 1,000 kilowatts in size are eligible to receive credit or compensation for any electricity generated onsite in excess of their onsite usage.

Any surplus generation produced by these systems flows back into the distribution grid and offsets the electricity that would otherwise have to be purchased from the regional wholesale market to serve other customers.

Currently, customer-generators are charged their full retail rate for electricity supplied by Eversource and receive credits for electricity they export to the grid based on Eversource' Net Energy Metering (NEM) tariffs.

Warner Community Power intends to provide new rates and terms that compensate participating customer-generators for the electricity supply component of their net metered surplus generation.

Customer-generators will continue to receive any non-supply related components (e.g., transmission and distribution credits) directly from Eversource, as specified under the terms of their applicable net energy metering tariff.

For group net metering where the host customer-generator is on default service, to the extent Warner Community Power supply rates are lower than Eversource default service or if the host is located outside of Warner, it may be most advantageous for the host to remain a Eversource default service customer, while the other group members are free to switch to Warner Community Power for their supply and continue to receive on-bill credits for their participation in the group.

Warner Community Power's exact terms, conditions, and rates for compensating and crediting different types of NEM customer generators in the Town will be set at duly noticed public meetings and fully disclosed to all prospective NEM customers through the program's enrollment notification process and thereafter.

Certain aspects of administering net energy metering require coordination between Eversource and Warner Community Power. The enabling services and strategies that Warner Community Power may pursue, to benefit and encourage customers to adopt distributed generation, include but are not limited to:

- Dual-billing customer-generators separately for supply services;
- Offering time-varying rates and alternative credit mechanisms to compensate customers for surplus generation;
- Streamlining the establishment of new Group Net Metering and Low-Moderate Income Solar Project groups;
- Facilitating interval meter and Renewable Energy Certificate (REC) meter installations for customer-generators; and
- Engaging at the Legislature and Public Utilities Commission to advocate for upgrades and reforms to metering and billing infrastructure and business processes to enable Net Energy Metering and other innovative services to benefit customer-generators.

For additional details regarding these enabling services and strategies, refer to:

- [Attachment 2](#) provides an in-depth discussion regarding operational and strategic opportunities to enhance net metering and group net metering through Warner Community Power.

G. Ensuring Discounts for Electric Assistance Program Participants

Income eligible households can qualify for discounts on their electric bills under the Electric Assistance Program. Warner Community Power will support income eligible customers who enroll in the Electric Assistance Program to receive their discount.

Electric Assistance Program discounts are funded by all ratepayers as part of the System Benefits Charge, which is charged to all customers and collected by the distribution utilities.

At present, the Public Utilities Commission and utilities only support provision of the discount to individual customers when the customer's electricity supply charges are billed through the distribution utility.

Warner Community Power consequently plans to rely on Eversource to bill all customer accounts enrolled in the Electric Assistance Program. This represents no change in the provision or funding of this program.

This arrangement may be revisited if, at some point in future, the Public Utilities Commission enables Community Power programs to provide Electric Assistance Program customers with their discount directly.

H. Termination of the Program

There is no planned termination date for Warner Community Power.

Warner Community Power may be terminated by majority approval at a Town Meeting. If so terminated, Warner Community Power would cease operations after satisfying any obligations contractually entered into prior to termination, and after meeting any advance notification period or other applicable requirements in statute or regulation, at which point participating customers would either be transferred to default service provided by Eversource or to a Competitive Electric Power Supplier of their choosing.

Warner Community Power will provide as much advance notice as possible regarding the potential or planned termination of the program to participating customers, the Coalition, the Public Utilities Commission and Eversource.

Upon termination, the balance of any funds accrued in the program's financial reserve fund and other accounts, if any, would be available for distribution or application as directed by the Select Board and in accordance with any applicable law and regulation.