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November 17, 2017

Re: DE 16-576, Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators Providing for Written Comments on Non-Wires Alternative Pilot Program Issues Clarification

To the Parties:

On November 9, 2017, Commission Staff filed a letter reporting that stakeholders had agreed during their November 6<sup>th</sup> working group session that the Commission should be asked to solicit comments from parties and then provide clarification of certain relevant issues before the continuation of efforts to develop non-wires alternative (NWA) pilot programs, as directed pursuant to Order No. 26,029 (June 23, 2017). Staff recommended that the Commission request written comments from the parties in this proceeding with respect to a number of specific questions, as listed in its letter.

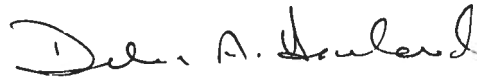
The Commission has reviewed and approved Staff's recommendation. Accordingly, the parties are directed to submit written comments on or before December 8, 2017 that address the following questions:

1. Should the NWA pilot programs be limited to distributed generation (DG) projects or should the pilot programs also be open to other distributed energy resources (DERs), such as demand response, energy efficiency measures, or battery storage, either on a standalone basis or in concert with DG installations?
2. If the NWA pilot programs are open to other DERs in addition to DG, will the pilots provide sufficient "experience and data demonstrating the effects of DG on potentially-stressed components of the utility distribution system at specific locations," per the June 23<sup>rd</sup> Order?
3. If the answer to question 2 above is negative or uncertain, should NWA pilot programs be undertaken in this docket?
4. If the answer to question 3 above is negative, should NWA pilot programs instead be deferred for potential implementation in other contexts, such as utility integrated resource planning dockets or grid modernization initiatives?

5. If NWA pilot programs are not undertaken in this docket, should studies be conducted to determine the potential benefits of DG deployment as a means of avoiding or deferring distribution system capital projects in specific locations?
6. If NWA pilot programs are not undertaken in this docket, should maps or other presentations be prepared showing locations where DG installations potentially would be beneficial as a means of avoiding or deferring distribution system capital projects?
7. If NWA pilot programs are not undertaken in this docket, should some other methodology not identified above be used to determine the potential benefits of DG deployment as a means of avoiding or deferring distribution system capital projects?

The written responses to those seven questions should be no longer than five pages in length, double-spaced text, and meet the other format requirements specified in Puc 203.04.

Sincerely,



Debra A. Howland  
Executive Director

cc: Docket File  
Service List