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CHAIRMAN
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Debra A. Howland



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:
www.puc.nh.gov

November 9, 2017

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: DE 16-576, Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators Report of November 6, 2017 Working Group Session on Development of Non-Wires Alternative Pilot Programs

Dear Ms. Howland:

On November 6, 2017, representatives of various parties and Commission Staff (Staff) convened for a working group meeting tasked with the development of non-wires alternative (NWA) pilot programs, as directed by the Commission in Order No. 26,029 (June 23, 2017).

During that meeting, it became apparent that there was not general consensus as to the fundamental scope and purpose of the proposed NWA pilot programs. Based on experience of some stakeholders, NWA programs in other states often allow participation by various types of distributed energy resources (DERs), either individually or more typically in aggregate. The stakeholder representatives attending the working group session agreed that the Commission should be asked to solicit comments from parties and then provide clarification of the relevant issues before pilot program development efforts continue.

Staff therefore recommends that the Commission seek written comments from the parties in this proceeding with respect to 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 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 23rd 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?

Staff respectfully requests that the Commission direct the parties to address the questions set forth above through written comments submitted on or before November 30, 2017.

I hereby certify that a copy of this letter will be served electronically on the parties on the service list at the same time it is filed with the Commission.

Sincerely,



David K. Wiesner
Staff Attorney

cc: Service List

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

Executive.Director@puc.nh.gov	
aboyd@acadiacenter.org	catherine.marsellos@puc.nh.gov
abuxton@preti.com	cdumit@solarcity.com
acochis@daymarkea.com	chris.rauscher@sunrunhome.com
alesko@preti.com	christian.brouillard@libertyutilities.com
alexmarquez146@gmail.com	Christopher.aslin@doj.nh.gov
alinder@nhla.org	christopher.goulding@eversource.com
allen.desbiens@eversource.com	christopher.skoglund@des.nh.gov
amanda.noonan@puc.nh.gov	clayaz23@gmail.com
b.hayden@standardpower.com	clifton.below@gmail.com
barbara.bernstein@puc.nh.gov	cshute@vermontlaw.edu
becca.polisuk@sunrunhome.com	cynthia.trottier@libertyutilities.com
belder@eq-research.com	david.shulock@puc.nh.gov
besakkimuthu@daymarkea.com	david.wiesner@puc.nh.gov
bking31415@gmail.com	deandra.perruccio@puc.nh.gov
bob.reals@libertyutilities.com	debski@unitil.com
breed@solarcity.com	dhartford@clf.org
brian.buckley@oca.nh.gov	dholt@consumerenergyalliance.org
brian.rice@eversource.com	dlittell@raponline.org
brianna@nhsea.org	donald.kreis@oca.nh.gov
bwaugh@townandcitylaw.com	donoghue@norwichtech.com
callnanb@nhec.com	downesm@unitil.com
camerinos@nhec.com	eburgess@strategen.com
canderson@borregosolar.com	edward.davis@eversource.com
carroll@unitil.com	eemerson@primmer.com

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DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

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c) Serve a written copy on each person on the service list not able to receive electronic mail.

ehawes@acadiacenter.org
eisfeller@unitil.com
elizabeth.nixon@puc.nh.gov
energyclinic@vermontlaw.edu
epler@unitil.com
eric.stanley@libertyutilities.com
f.anne.ross@puc.nh.gov
furino@unitil.com
glenn@scenicnursery.net
greg@southpacksolar.com
harringt1@metrocast.net
heather.tebbetts@libertyutilities.com
hpd7@wildcats.unh.edu
jack@revisionenergy.com
jaimie@granitestatesolar.com
james.brennan@oca.nh.gov
jameskw@nhbfa.com
jared.chicoine@nh.gov
jarvis@unitil.com
jbesser@necec.org
jdickerson@necec.org
jeb.bradley@leg.state.nh.us
jill.fitzpatrick@libertyutilities.com
jim_obrien@tnc.org
jkennerly@seadvantage.com
jlu@daymarkea.com
jody.carmody@puc.nh.gov
joseph.doiron@nh.gov
jrodier@mbtu-co2.com
jvoyles@consumerenergyalliance.org
kaminski@nhec.com
karen.cramton@puc.nh.gov
karen.sinville@libertyutilities.com
kat@solarendeavors.com
kate@nhsea.org
katherine.peters@eversource.com
kerry.holmes@nh.gov
kim.quirk@gmail.com
kkelly@daymarkea.com
kristi.davie@eversource.com
lee.oxenham@leg.state.nh.us
leonardc@nashuanh.gov
leszek.stachow@puc.nh.gov
lgallant@preti.com
lhuber@strategen.com
lrichardson@jordaninstitute.org
marc.lemenager@eversource.com
marc@neratepayers.org
marge.shepardson@gmail.com
matt@sunraiseinvestments.com
matthew.fossum@eversource.com
maureen.karpi@libertyutilities.com
mbirchard@clf.org
mdean@mdeanlaw.net
melissa.price@eversource.com
michael.sheehan@libertyutilities.com
michael.sisto@puc.nh.gov
michael.vose@leg.state.nh.us
mineaum@nashuanh.gov
mlebel@acadiacenter.org
mloiacono@daymarkea.com
mulin@revisionenergy.com
nathan@votesolar.org
ocalitigation@oca.nh.gov

palma@unitil.com
paula.maville@lebcity.com
pbean@solarcity.com
pbrown@preti.com
pchernick@resourceinsight.com
perrym@nashuanh.gov
pjaesd@comcast.net
pmartin2894@yahoo.com
pradip.chattopadhyay@oca.nh.gov
ran@essexhydro.com
rburke@nhla.org
rebecca.ohler@des.nh.gov
rhonda.bisson@eversource.com
richard.chagnon@puc.nh.gov
richard.labrecque@eversource.com
rick.white@eversource.com
robert.bersak@eversource.com
robertbackus05@comcast.net
samantha.a.baker@lmco.com
sandra@plymouthenergy.org
sarah.knowlton@libertyutilities.com
sberman@daymarkea.com
sfaryniarz@daymarkea.com
simpsonc@unitil.com
slamb@biaofnh.com
smaslansky@nhcdfa.org
sprague@unitil.com
Stephen.Eckberg@puc.nh.gov
Stephen.Hall@libertyutilities.com
stettenheim@norwichtech.com
steveh@revisionenergy.com
steven.mullen@libertyutilities.com
stower@nhla.org
tanya.wayland@puc.nh.gov
taylorp@unitil.com
tculley@kfwlaw.com
tgriset@preti.com
tirwin@clf.org
tmichelman@seadvantage.com
tom.frantz@puc.nh.gov
treardon@rocnh.org
wpratt@utilidata.com