



**COMMUNITY  
POWER COALITION**  
OF NEW HAMPSHIRE  
*For communities, by communities.*

c/o Sustainability Director  
Town of Hanover,  
41 S Main Street  
Hanover, NH 03755

September 26, 2022

Daniel C Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street  
Concord, NH 03301-2429

**Re: IR 22-053, ELECTRIC AND GAS UTILITIES, Investigation of Energy  
Commodity Procurement (Renewable Portfolio Standard, Default Service  
Electric Power, and Cost of Gas) Methodology and Process**

**Initial Comments**

To the Commission:

In its Order of Notice commencing the above-referenced proceeding, the Commission invited interested stakeholders to “pre-file comments” on or before today “so that the presiding officer can address any matters on which there is disagreement during the prehearing conference.” Please treat this letter as the initial comments of the Community Power Coalition of New Hampshire (“Coalition”).

The Coalition generally concurs with the comments of the Office of Consumer Advocate filed earlier today regarding both procedural concerns and default energy service from Electric Utilities. The Coalition has no comment on Cost of Gas.

There is one additional scoping matter that the Coalition would like to bring to the Commission’s attention and that should be addressed as part of any investigation into default electricity supply procurement as well as in an adjudicated proceeding. That matter is the question raised in RSA 362-A:9 XXI(a), which reads as follow:

XXI. (a) The commission shall consider the question of whether or not exports to the grid by customer-generators taking default service should be accounted for as reduction to what would otherwise be the wholesale load obligation of the load serving entity providing default service absent such exports to the grid. The commission shall use its best efforts to resolve such question through an order in an adjudicated proceeding, which may be DE 16-

576, issued no later than June 15, 2022.

To the Coalition's knowledge this question has not been addressed to date and the 3 investor-owned distribution utilities in New Hampshire are not believed to account for exports to the distribution grid by customer-generators as offsets or reductions to the wholesale load obligation of the Load Serving Entity providing default service that they have to procure in the ISO New England market. If exports to the grid by customer-generators were treated by utilities as part of their default energy service supply, then it would reduce the amount and cost of electricity supply that is purchased through the default service LSE.

Time does not allow further initial comment, but thank you for this opportunity.

Yours truly,

*Clifton Below*

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