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Via electronic mail only

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 22-060 - Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation of Customer-Generators
Joint party responses to record requests

Chairman Goldner:

Pursuant to the Commission's April 24 prehearing order, which issued record requests asking for responses from the "settling parties" in this docket (the "Order") and Order No. 27,018, modifying the Order and moving the due date for these responses to today, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc.; Walmart, Inc.; Clean Energy New Hampshire; Granite State Hydropower Association; and Standard Power of America ("Responding Parties") hereby submit the attached responses to those requests.

The Responding Parties note that Requests A, B, and C ask about net metering policies, compensation designs and tariffs in all New England states as well as certain states outside New England, and questions O and P ask about subject matter in which the witnesses for the Responding Parties are not expert or versed. The Responding Party witnesses are not in possession of the information needed to respond to these five requests.¹ To the extent that this information could be acquired – and it is not clear that all of it could – the witnesses do not have firsthand experience with or knowledge of it. While these responses are not part of the administrative record, providing responses to these questions is akin to testifying. The Commissioners could ask the same questions of the witnesses on the stand at hearing on the record, but the witnesses are not qualified to testify regarding the subject matter of these certain requests, nor would they be able to answer these questions if asked on the stand. As a general matter, witnesses typically testify to the extent of their own firsthand knowledge and experience, and whenever possible, particularly in the case of expert or company-representative witnesses, only to their areas of expertise. Similarly, parties are only permitted to enter exhibits and evidence to which they can speak with firsthand knowledge. For the above-mentioned requests, this is not possible. Considering these natural limitations, the

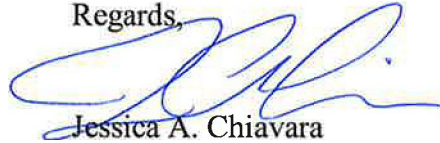
¹ With the exception of Massachusetts, Connecticut and California (and Illinois to a limited extent) to which the Eversource and Unitil witnesses can opine (for MA and CT) and provide information, as the companies do business in those states and the witnesses have direct and expert knowledge about their respective company's net metering tariffs in those service territories. The Clean Energy New Hampshire witnesses are sufficiently well-versed in the California net metering tariff to provide a fulsome response to that request.

witnesses have provided responses to all of the Commission's requests save for O and P, and have responded to the fullest extent possible to A, B, and C given the Responding Parties' witnesses' joint expertise.

The Responding Parties also note that settlement discussions among the parties to the docket – except for the Department of Energy and the Community Power Coalition of New Hampshire – are ongoing. As such, the settlement agreement has not been drafted nor has it been executed, and so the parties participating in settlement discussions do not have a unified position at this time. The Responding Parties worked together to provide as fulsome and responsive answers as possible given the witnesses' expertise, but these responses do not represent any settlement position of any party in this docket, as there are no official settlement positions at this time. The Responding Parties anticipate resuming settlement activities now that these responses are complete. Once completed and executed, the parties to the eventual settlement agreement will support all recommendations in the settlement as just, reasonable, and in the public interest.

Notwithstanding the above, the Responding Parties have an understanding of the issues the Commission wishes to discuss and witnesses will be prepared at hearing to answer fully all Commissioner questions to the best of their ability in reliance on their existing knowledge, and in support of the settlement agreement. Consistent with current Commission policy this filing is being made electronically only; paper copies will not follow. If you have any questions, please contact me. Thank you for your assistance with this matter.

Regards,



Jessica A. Chiavara

Senior Counsel, Eversource Energy
o/b/o the Responding Parties

cc: DE 22-060 service list