

**Community Power Coalition of New Hampshire (CPCNH) Responses**

NHPUC Docket: DE 22-060

Consideration of Changes to the Current Net Metering Tariff Structure,  
Including Compensation of Customer-Generators

Public Service Company of New Hampshire d/b/a/ Eversource Energy (EE)  
Set 1 Data Requests to CPCNH

Date Request Received: 2/6/24

Date of Response: 2/20/24

Request No. EE to CPCNH 1.3

Witness & Respondent: Clifton Below

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**REQUEST:**

**1.3.** On Page 4, lines 20-21, the example using a 7 million kWh hydro facility calculates a “compliance obligation” of \$56,000. RPS compliance is based on a Load Serving Entity’s total megawatt-hours of electricity supplied by the provider to its end-use customers. Since the Group Net Host isn’t considered an LSE and the 7 million kWh of generated energy isn’t supplied by the utility to its end-use customers, to whom does this obligation apply?

**RESPONSE:**

The example is to the value of the compensation included in the payment to the hydro facility at the full default service rate, a portion of which is for RPS compliance and other adjustment factors beyond the value of power supplied to serve utility default energy service loads. Such generation facilities are likely to produce and monetize RECs for all of their production. The delivery of power to end-use customers is what triggers the compliance obligation. The example illustrates the portion of compensation credited or paid to the customer-generator that represents the RPS compliance cost embedded in the full utility default service rate. As noted in the response to DR CPCNH 1.2, the total of such adjustments during the current rate period for large customers is \$0.03675 or a total of \$256,900 for 7 million kWh.

As a result, the retail load that is nominally “offset” by a Municipal Host (or regular group host if the generator is 1 MW or less) with 7 million kWh exported over the course of the year would be incurring the compliance obligation, presumably covering such cost when they pay the full utility default service rate. However, because that same full rate is matched against the illustrative generator’s output to the grid, the 7 million kWh in load “offset” by generator, is in effect, contributing nothing toward their own RPS compliance costs for those 7 million kWh, with all of those costs being shifted to the entire utility customer base in Eversource’s case.

Another way to look at this is to think of the credits being paid to the host as being used to pay the electricity supply rate of the group members such that they do not pay anything towards their RPS compliance obligation costs.