

**THE STATE OF NEW
HAMPSHIRE BEFORE
THE
NEW HAMPSHIRE PUBLIC UTILITIES
COMMISSION**

JOINT TESTIMONY OF

**Edward A. Davis, Brian J. Rice, Dawn Coskren on
behalf of PUBLIC SERVICE COMPANY OF NEW
HAMPSHIRE d/b/a EVERSOURCE ENERGY**

**Karen M. Asbury and John J. Bonazoli on behalf of UNITIL ENERGY SYSTEMS, INC.
D/B/A UNITIL, INC.**

and

**Dilip K. Kommineni and Laura Sasso on behalf of LIBERTY UTILITIES (GRANITE
STATE ELECTRIC) CORP. D/B/A LIBERTY**

**CONSIDERATION OF CHANGES TO THE CURRENT NET METERING TARIFF
STRUCTURE, INCLUDING COMPENSATION OF CUSTOMER-GENERATORS**

Docket No. DE 22-060

August 11, 2023

INTRODUCTION

1 **Q. Mr. Davis, please state your name, business address and position.**

2 A. My name is Edward A. Davis. My business address is 107 Selden Street, Berlin, CT
3 06037. My position is Director, Rates at Eversource Energy Service Company and in that
4 position I provide rate and tariff related services to the operating companies of
5 Eversource Energy including Public Service Company of New Hampshire d/b/a
6 Eversource Energy (“Eversource”).

1 **Q. Please describe your educational background and professional experience.**

2 A. I hold a Bachelor of Science degree in Electrical Engineering from the University of
3 Hartford and Master of Business Administration from the University of Connecticut. I
4 joined Northeast Utilities, now Eversource Energy, in 1979 and have held various
5 positions in the areas of consumer economics, engineering and operations, wholesale and
6 retail marketing and rate design, regulation and administration.

7

8 **Q. Have you previously testified before the New Hampshire Public Utilities
9 Commission?**

10 A. Yes. I have on many occasions testified before the New Hampshire Public Utilities
11 Commission (“Commission”) on behalf of Eversource, and at the state utility
12 commissions in Connecticut and Massachusetts on behalf of other Eversource Energy
13 affiliates on rate related matters.

14

15 **Q. Mr. Rice, please state your name, business address and position.**

16 A. My name is Brian J. Rice. My business address is 247 Station Drive, Westwood, MA
17 02090. My position is Director, Customer Solar Programs at Eversource Energy Service
18 Company and in that position I provide oversight of solar programs for Eversource
19 customers in multiple New England states.

20

21 **Q. Please describe your educational background and professional experience.**

22 A. I hold a Bachelor of Science degree in Industrial Economics from Union College and

1 Master of Business Administration degree from the Boston College Carroll Graduate
2 School of Management. I've held positions in different functions at Eversource since
3 2011 associated with wholesale energy markets, tariff design and regulatory
4 requirements. Prior to joining Eversource I held consulting positions covering various
5 segments of the energy and utility industries.

6
7 **Q. Have you previously testified before the Commission?**

8 A. Yes, I have testified in front of the Commission on several occasions including in Docket
9 Nos. DE 19-197 on the Statewide Energy Data Platform, DE 21-078 Eversource's
10 electric vehicle make-ready and demand charge alternative proposals, and DE 20-170 on
11 electric vehicle time of use rates.

12
13 **Q. Please state your name, business address, company position, and principal
14 responsibilities in your current position.**

15 A: My name is Dawn Coskren, I work at 73 West Brook Street in Manchester, New
16 Hampshire. I work for Eversource Energy Service Company as Manager for Billing and
17 Data Management for PSNH and Eversource Energy's affiliate in Western
18 Massachusetts. In this role I'm responsible for managing activities associated with
19 billing and meter data management of Eversource Energy and establishing practices to
20 ensure that accurate bills are issued in a timely manner.

21
22

1 **Q. Please provide your educational and professional background.**

2 A: I have an Associates of Science in Business Administration Management and a Bachelor
3 of Arts in Communications from Southern New Hampshire University. I have over 20
4 years of experience in customer service in leadership positions.

5

6 **Q. Have you previously testified before the Commission?**

7 A: I recently submitted testimony in Docket No. DE 23-063 on behalf of Eversource in the
8 Joint Utility Petition for Waiver of Certain Provisions of the Puc 2200 Rules.

9

10 **Q. Ms. Asbury, please state your name, business address and position.**

11 A. My name is Karen M. Asbury. My business address is 6 Liberty Lane West, Hampton,
12 New Hampshire 03842. I am the Director of Regulatory Services for Unitil Service
13 Corp. which provides centralized management and administrative services to all Unitil
14 Corporation's affiliates including Unitil Energy Systems, Inc.

15

16 **Q. Please describe your educational background and professional experience.**

17 A. In 1987, I graduated magna cum laude from the University of New Hampshire with a
18 Bachelor of Science Degree in Mathematics. I joined Unitil Service Corp. in January
19 1988 and have held various positions in the regulatory/rate department. In my current
20 position, I am responsible for directing regulatory filings, pricing research, analysis, and
21 design, tariff administration, customer research, and other analytical services.

22

1 **Q. Have you previously testified before the Commission?**

2 A. Yes. I have testified before the New Hampshire Public Utilities Commission
3 (“Commission”) and the Massachusetts Department of Public Utilities on behalf of Unitil
4 and its affiliates.

5

6 **Q. Mr. Bonazoli, please state your name, business address and position.**

7 A. My name is John J. Bonazoli, I am the Manager of the Distribution Engineering
8 Department at Unitil Service Corp. which provides centralized management and
9 administrative services to all Unitil Corporation’s affiliates including Unitil Energy
10 Systems, Inc.

11 .

12 **Q. Please describe your educational background and professional experience.**

13 A. In 1987, I received my Bachelor of Science degree in Electrical Engineering from
14 Northeastern University. I also graduated from Lesley University, in 1993, with a Master
15 of Science degree in Management. I am a registered Professional Engineer in the State of
16 New Hampshire and the Commonwealth of Massachusetts. I joined Unitil Service Corp.
17 in April, 1999 and have held various positions in the Engineering Department. In my
18 current position, I am responsible for managing the planning of the electric system and
19 interconnection of all Distributed Energy Resources (DER).

20

21 **Q. Have you previously testified before the Commission?**

22 A. Yes. I have testified before the New Hampshire Public Utilities Commission

1 (“Commission”) and the Massachusetts Department of Public Utilities on behalf of Unitil
2 and its affiliates.

3

4 **Q. Mr. Kommineni, please state your name, business address and position.**

5 A. My name is Dilip K. Kommineni. My business address is 9 Lowell Road, Salem, NH
6 03079 and I am employed as the Sr. Manager of Engineering by Liberty Utilities Service
7 Corp. (“LUSC”), which provides services to Liberty Utilities (Granite State Electric)
8 Corp. (“Liberty”).

9

10 **Q. Please describe your educational background and professional experience.**

11 A. In 2005, I received a Bachelor of Science from the Anna University at Chennai, TN -
12 (India). I graduated from Syracuse University in 2006 with a Master of Science in
13 Electrical Engineering. In 2010, I received a Master of Business Administration from
14 Le Moyne College. I joined National Grid in July 2006 as an intern and was employed
15 full time in January 2007. Since that time, I have held several roles of increasing
16 responsibility in protection, reliability, and distribution engineering, and obtained my
17 professional engineering license from New York. I joined LUSC as Senior Manager of
18 Engineering, where I am responsible for the safe and reliable operation, design, and
19 maintenance of the electric system for Liberty in New Hampshire.

20

21 **Q. Have you previously testified before the Commission?**

22 A. No, I have not testified before the Commission.

1 **Q. Ms. Sasso, please state your name, business address and position.**

2 A. My name is Laura Sasso. I am employed by LUSC as a Senior Manager, Billing, East
3 Region, providing services to the Liberty affiliates in the East Region, including Liberty.
4 My office address is 15 Buttrick Road, Londonderry, New Hampshire. I have been with
5 Liberty for 11 years and have been in the industry for 27 years.

6
7 **Q. Have you previously testified before the Commission?**

8 A. Yes, I filed testimony in Docket No. DE 23-063, the Joint Utilities' Petition for Waiver of
9 Certain Provisions of the Puc 2200 Rules.

10
11 **Q. What is the purpose of your testimony?**

12 A. The purpose of Eversource, Unitil, and Liberty's (the "Joint Utilities") testimony is to
13 assess the current compensation levels for net metering customers in New Hampshire and
14 address possible changes to the net metering tariff that may be up for consideration at this
15 time.

16
17 **Q. How is your testimony organized?**

18 A. Our testimony begins by assessing the current net metering tariff compensation structure,
19 examines whether changes are warranted, presents the current efforts and resources
20 needed to administer the current net metering program, and finally suggests a modest
21 application fee structure to mitigate potential cost shifts and allow the Joint Utilities to be
22 more acutely responsive to increases in demand for distributed generation projects. This

1 testimony was drafted after the conclusion of, and takes into account, a well-attended,
2 three-month stakeholder session representing diverse statewide interests.

3
4 **Q: Please summarize current net metering tariffs available to New Hampshire**
5 **electricity customers.**

6 A: Current net metering policies are enumerated in New Hampshire Code of Administrative
7 Rules Chapter Puc 900: Net Metering for Customer-Owned Renewable Energy
8 Generation Resources of 1,000 Kilowatts or Less, and are distinct for small customer-
9 generators whose facility has a total maximum generating capacity of not more than 100
10 kW, and for large customer-generators whose facility has a total maximum generating
11 capacity greater than 100 kW, up to and including 1 MW. Beginning in September 2017,
12 when the current net metering took effect, any new small customer-generators receive
13 monetary bill credits for net electricity exports over a billing period calculated at 25
14 percent of any distribution charges assessed on a per-kWh basis, any transmission
15 charges assessed on a per kWh-basis and, for default service customers, the default
16 service rate assessed on a per-kWh basis. Non-bypassable charges for new small
17 customer-generators are assessed based on the full amount of electricity received from
18 the distribution system without any netting of electricity exports over the billing period.

19
20 New large customer-generators are only eligible for net metering if at least 20 percent of
21 the actual or estimated annual electricity generation from its facility is consumed behind-
22 the-meter, or if it has registered as a group host. Eligible large customer-generators

1 currently receive monetary bill credits for net electricity exports over a billing period
2 calculated at the default service-rate assessed on a per-kWh basis.

3 The original standard net metering tariff is grandfathered for any projects approved
4 before the adoption of the current net metering tariff, and those grandfathered provisions
5 will apply until they sunset in 2040.

6
7 **Q: Please describe the level of customer participation in current net metering tariffs.**

8 **A:** Current net metering tariffs are effectively supporting opportunities for New Hampshire
9 customers to install distributed generation resources that reduce customer costs and
10 contribute incremental sources of renewable energy to the New Hampshire generation
11 mix. This has particularly been the case as the cost of renewable generation has declined
12 and wholesale energy costs increased. Customer participation in net metering has risen
13 significantly in the last couple of years. Last year, new net metering project applications
14 received nearly tripled for Eversource from 1,508 in 2021 to 4,152 in 2022. Unitil saw
15 notable increases for new project applications of 53%, from 905 applications in 2021 to
16 1,387 applications in 2022. Liberty also experienced significant growth in new project
17 applications, with an increase of 160%, rising from 126 applications in 2021 to 328
18 applications in 2022. This year, Eversource, Unitil, and Liberty are on track to see a
19 continued increase, with 2,352, 813, and 351 applications received as of July 1, 2023,
20 respectively. Overall, the steady increase in participation and the sharp uptick beginning
21 in 2022 has resulted in a robust net metering market in New Hampshire.

22

1 **Q: Do current net metering tariffs balance the interests of customer-generators with**
2 **those of non-net metered customers?**

3 A: The Joint Utilities believe they do. A large portion of credit provided to customer-
4 generators through the net metering tariff is directly tied to the wholesale cost of energy
5 reflected within default service rates and generally avoided or realized through utility
6 market activity. This ensures a large portion of net metering credit remains market-based
7 and distributed generation development in New Hampshire is market-driven, as has been
8 demonstrated through recent increases in solar deployment in response to changes in
9 energy supply rates. This shows that the current net metering tariff encourages customers
10 to make investment decisions based on real market conditions, and not just level of
11 subsidization.

12
13 Current net metering tariffs do risk shifting costs to non-net metered customers by
14 providing credit in excess of the wholesale market value of energy, in this instance, the
15 full default service rate, along with a portion of distribution and transmission rates, but
16 the risk of significant cost shifting in New Hampshire is mitigated by several factors.
17 The current net metering tariff limits credit for distribution and transmission values to
18 only small customer-generators, providing credit for excess generation at only 25 percent
19 of the distribution rate and providing credit for only kWh-based retail rates limits the
20 amount of credit provided to New Hampshire customer-generators that may exceed the
21 wholesale energy market value of energy and risk shifting costs to non-net metered
22 customers. Net metering tariff designs which have more expansive customer eligibility

1 or issue credits for larger portions of retail rates (i.e. for rates other than supply-related
2 rates) are at higher risk of shifting costs to non-net metered customers.

3
4 The Joint Utilities also generally agree that distributed generation facilities can provide
5 greater benefits than larger generation resources by reducing line losses, lowering peak
6 loads on portions of the distribution system and diversifying energy resources. These
7 benefits are more difficult to objectively quantify and are likely to vary based on resource
8 type and location on the electric power system, but they should be considered in any
9 assessment of the balance of Customer-Generator interests with those of non-net metered
10 customers. This is consistent with the 2022 update to the New Hampshire Ten Year State
11 Energy Strategy, which states: “**Having a diverse resource mix can help ensure a**
12 **secure, reliable, and resilient energy system.**” (New Hampshire 10-Year State Energy
13 Strategy at page 39, emphasis in original).

14
15 The actual costs and benefits of distributed generation facilities are difficult to completely
16 validate and the current net metering structure does create a risk that electric power
17 system costs could be shifted from net metered customers to non-net metered customers.
18 However, the Joint Utilities do not believe the current net metering structure is creating a
19 clear or significant imbalance between the interests of net metered and non-metered
20 customers that requires the Commission to address through significant revisions to the
21 existing net metering tariff.
22

1 **Q: Should the Commission implement new alternative net metering tariffs?**

2 A: The Joint Utilities do not recommend new alternative net metering tariffs at this time.
3 The current net metering tariffs are not creating clearly unbalanced outcomes that merit
4 correcting. A growing number of New Hampshire residents and businesses are
5 increasingly able to make renewable energy choices that reduce their electric bills and
6 introduce potential indirect benefits that are realized by all customers. Moreover, the
7 current net metering tariff is a workable model that is administratively efficient and
8 aligned with technical capabilities, further ensuring an equitable net metering program. If
9 the Commission were to consider alterations to the existing tariff, the Joint Utilities
10 recommend that the Commission consider only limited adjustments to the existing net
11 metering tariffs, and that any such adjustments maintain the level of facility of
12 administration and work within respective technical capabilities and processes to prevent
13 any incremental administrative or equipment and system costs. Costs that are not
14 necessarily commensurate with benefits would have an overall effect of diluting the cost
15 effectiveness of the New Hampshire net metering program, increasing the cost shift to
16 non-net metered customers.

17
18 **Q: Should the Commission consider alternative rate structures, including time-based
19 tariffs?**

20 A: Alternative rate structures are not necessary right now and would not be practicable or
21 necessarily appropriate for incorporation into a net metering program in New Hampshire.
22 Current rate structures provide adequate opportunity for New Hampshire customers to

1 choose renewable energy options and balance interests with non-net metered customers.
2 Adding time-varying rate structures would add significant complexity to administration
3 of the net metering program, without commensurate benefits or making the program all
4 that much more equitable than it is presently.

5
6 Time differentiated pricing may not significantly change value for many customers, but
7 would likely require additional expenditures in meter and billing systems. Netting energy
8 over a monthly period dilutes the temporal distinction of such pricing, especially as
9 applied to any net exports, and is consistent with a non-time differentiated net meter
10 tariff. Any element of pricing associated with potential net metering alternatives must be
11 given due consideration, no matter the type of pricing structure; this includes supply,
12 transmission and distribution components of rates. Primary considerations when
13 contemplating more complex net metering tariffs include costs and cost effectiveness of
14 metering as metering technology develops, and utility data management and billing
15 systems are upgraded or replaced.

16
17 **Q: Should monetary credit provided through net metering tariffs be adjusted to**
18 **include compensation for services and value currently not compensated, such as**
19 **avoided transmission, distribution, and capacity costs?**

20 A: No, further adjustments are not required. There is no evidence that current net
21 metering tariffs undercompensate customer-generators for services and value they
22 provide. As explained previously, small customer-generators already receive credit for

1 the distribution and transmission portions of their bills. All customer-generators also
2 receive credit for excess generation at the default energy service rate, which reflects the
3 wholesale cost of generation capacity and other costs incorporated into the default energy
4 service rate. Current net metering tariffs provide credit to customer-generators in a way
5 that strikes a balance with the interests of all other customers and, as discussed
6 previously, net metering tariff designs with more expansive eligibility and offer credits
7 for larger portions of retail rates are at higher risk of shifting costs to non-net metered
8 customers as either larger credits or expanded participation can increase overall program
9 costs which are born by all customers.

10
11 **Q: Should net metering tariffs limit the total capacity of net metering within each**
12 **utility's service territory?**

13 A: No. Prior to the implementation of the currently effective alternative net metering
14 structure, eligibility for the original standard net metering tariff was limited to the first
15 100 MW of generating capacity. However, the standard net metering tariff also provided
16 a larger credit for excess generation to customer-generators as compared to the alternative
17 net metering tariff. In contrast, availability of the alternative net metering tariff was not
18 limited regarding the total capacity of net metered facilities statewide when it was
19 adopted and the Joint Utilities do not believe it needs to be limited. The current
20 alternative net metering structures already include features that mitigate the risk of
21 significant imbalances between net metered and non-net metered customers. Further
22 limits on the availability of alternative net metering are not required at this time to

1 preserve an equitable balance in customer interests.

2
3
4 **Q: Should new net metering tariffs be adopted that apply to newly constructed**
5 **customer-generators with a total peak generating capacity of greater than one**
6 **megawatt?**

7 A: Generating facilities with total peak generating capacity of greater than 1 MW are
8 currently permitted to interconnect to the electric distribution system by following
9 established processes, operate and obtain revenue through participation in regional
10 energy markets. The Joint Utilities take no position on whether new metering tariffs
11 should be adopted to provide such facilities greater than 1 MW another commercial
12 option by making net metering available in lieu of directly participating in the wholesale
13 market, but believes there are both advantages and disadvantages that the Commission
14 should consider.

15
16 Facilities with a generating capacity of greater than 1 MW are typically able to take
17 advantage of economies of scale and be successfully developed at lower unit cost than
18 smaller facilities. The installed cost of solar generating facilities greater than 1 MW
19 enrolled in the Solar Massachusetts Renewable Target (“SMART”) Program has
20 averaged \$2.13/W while the cost of facilities with capacity of 500-1,000 kW has
21 averaged \$2.43/W, a cost difference of roughly 15 percent.¹ Permitting lower cost

¹ Figures as of July 2023: <https://www.mass.gov/doc/smart-solar-tariff-generation-units>

1 resources to participate in net metering tariffs may expand opportunities for New
2 Hampshire customer-generators to install generating resources that reduce customer costs
3 and further diversify the generation mix of New Hampshire.

4
5 Permitting participation of larger generating facilities in the net metering tariff may also
6 expand opportunities for more New Hampshire customers to participate in net metering
7 programs and realize cost savings from renewable generation. Puc 909 that establishes
8 the parameters of current group net metering enable customer-generators to host facilities
9 that generate electricity in excess of their own electrical usage and distribute credit for
10 that excess generation to other utility customers, either directly or through on-bill credits.
11 This structure enables customers who are less able to install onsite generation at their
12 premise to support and benefit from net metered generating facilities as group members.
13 Larger facilities may enable more customers, including low-income customers, to
14 participate in these shared generation arrangements.

15
16 However, the Commission may also consider that larger generating facilities may be less
17 likely to provide certain benefits as compared to small distributed generation facilities.
18 Generating facilities that must be sited on larger parcels of land may be less likely to be
19 situated on portions of the distribution system where output would offset nearby loads.
20 Not only would such facilities be less likely to have beneficial impacts on net loads, their
21 operation may negatively impact system operations and require the utility to complete, at
22 the interconnecting customer's expense, upgrades to the distribution system to maintain

1 safe and reliable operations. Other New England states that have permitted facilities
2 greater than 1 MW to participate in net metering tariffs have experienced significant
3 saturation of many circuits, necessitating that utilities plan substantial system upgrades to
4 enable further distributed generation development. Lastly, the Commission should
5 consider that a 1 MW solar generating facility will require several acres of land for siting
6 and larger facilities will have commensurately larger footprints. The Commission should
7 ensure such a change remains appropriately balanced with land use policies of New
8 Hampshire communities.

9
10 **Q: Should the Commission consider other regulatory mechanisms for customer-**
11 **generators?**

12 A: Yes. The Joint Utilities recommend the Commission consider approving application fees
13 that better support Joint Utilities' administrative processes to interconnect and enroll
14 growing numbers of customer-generators in net metering tariffs. Approval of modest
15 application fees are not expected to be a barrier to customer installation of distributed
16 generation, but would provide funds that would respond to changes in customer interest
17 in clean energy options and mitigate the risk of non-net metered customers contributing
18 to the unique administrative costs of serving customers that choose to install distributed
19 generation and participate in net metering tariffs.

20
21
22

1 **Q: Please describe the administrative requirements for interconnection and enrollment**
2 **of customer-generators.**

3 A: Utilities have had an increased need for dedicated staff and systems to support the
4 acceptance, review and approval of the significant increase in applications for customer-
5 generators to interconnect to the distribution system and operate distributed generation
6 facilities. Recent increases in distributed generation applications has required Eversource
7 to expand these resources to support service to customers. To more efficiently manage
8 the customer-generator enrollment process, Eversource and Unitil are in the process of
9 launching a dedicated online application portal for customer-generators, which will
10 mitigate some of the staffing needs and expedite the application process, bettering the
11 customer experience.

12
13 Once enrolled, billing customer-generators, sharing credits and other net metering tasks
14 introduce unique requirements that often need some level of manual intervention to bill
15 customer-generator accounts. The billing process also requires quality assurance and
16 manual controls to ensure accurate billing and compliance with unique program
17 requirements.

18
19 **Q: Please describe the Joint Utility resources, broken out by utility that support, or are**
20 **expected to support, interconnection and enrollment of customer-generators, as well**
21 **as billing and maintenance of program administration.**

22 A: As the state's largest utility, the increased interest in distributed generation in

1 Eversource's service territory has been most noticeable. As outlined previously,
2 Eversource has experienced an almost tripling of net meter applications in 2022 when
3 compared to 2021 and the 2023 year-to-date number of applications are exceeding the
4 pace established in 2022. To accommodate this increase in Net Metering Applications
5 Eversource's Distributed Generation Customer Care team who are responsible for
6 processing interconnection applications, sending project status updates, and answering
7 inquiries about the net metering program from customers and solar developers is
8 increasing staffing levels to eight employees. These personnel also participate in the
9 management of the Group Net Metering program (enrollment and annual reporting) and
10 the REC Independent Monitoring program (enrollment & quarterly reporting) as
11 mandated by DE 16-576. Additionally, there are six distribution engineers and two
12 contractor engineers who perform technical reviews of interconnection applications and
13 certificates of completion. Eversource estimates that 17% of their time is spent reviewing
14 interconnection requests. Separate from the Distribution engineers who review
15 applications and certificates of complete, Eversource has six DER Planning engineers
16 responsible for pre-applications and interconnection requests to develop scope of studies
17 and cost estimates. Approximately 60% of these employees' time is spent on these tasks,
18 which is not currently covered by existing recovery mechanisms or fees. Application
19 fees will ensure well-matched resources for the demand of distributed generation, which
20 applies to all the Joint Utilities.

21
22 The range of Eversource billing department tasks required to support net metering tariff

1 participation include:

- 2 • Billing six different net metering programs under three tariffed rates
- 3 • Exception processing of billed accounts: net metered accounts don't credit on
- 4 their own through Eversource billing systems; the systems kick out exceptions for
- 5 Billing staff to take the necessary action to credit the customer account
- 6 • Monthly credit allocations and net meter credit payouts for Group Host accounts
- 7 • Alternate net metering payouts and required correspondence yearly and quarterly
- 8 • Standard net metering payouts and required correspondence yearly and quarterly
- 9 • Allocation and payout approvals
- 10 • Meter installs, exchanges and apply appropriate net meter program to each
- 11 customer account
- 12 • Fielding customer questions, regulatory research
- 13 • Monthly net metering controls reports
- 14 • Required reporting of customer allocations to Group Host account
- 15

16 Unitil and Liberty have also experienced an increase in distributed generation
17 applications necessitating committed resources. For Unitil, the primary responsibilities
18 for supporting net metering, interconnection and enrollment of customer-generators, and
19 billing and maintenance, fall within Regulatory Services, Customer Service, Distributed
20 Energy Resource group, and Customer Energy Solutions. In the Regulatory Services
21 department, Unitil has one Regulatory Analyst that reviews Group Net Metering
22 applications in coordination with the Department of Energy, prepares rates for billing,
23 and maintains data for reporting. Unitil estimates that 10 to 15% of the analyst's time
24 relates to this function in New Hampshire. The Customer Service department resources
25 that support net energy metering and billing include a Capital Biller, a Seacoast Biller,
26 Billing Support Analysts, Senior Billing Process Lead, and Billing Supervisor. The work
27 they support is similar to Eversource including

- 28 • Monthly billing of net energy metering customers
- 29 • Fielding customer questions

- 1 • Annual true-up process of net energy metering credits
- 2 • Preparing monthly group host checks
- 3 • Set up and maintenance of new accounts and net energy metering credit
- 4 allocations
- 5 • Monthly net energy metering control reports
- 6

7 Unitil estimates that 6% to 7% of the time of the group above relates to this function in
8 New Hampshire.

9

10 Unitil's Distributed Energy Resource (DER) support team includes a dedicated DER
11 group who works solely on efforts of interconnecting DER as well as support from other
12 Customer Service, Metering, and Operations departments. The DER group consists of
13 four full-time employees and one or two temporary employees hired as needed. The full
14 time employees include a manager, two DER analysts who process residential and small
15 applications, and a DER Engineer who performs the analysis and administration for
16 larger applications. The DER group process applications for New Hampshire and
17 Massachusetts.

18

19 In addition to the DER group, a member of the Customer Energy Solutions team supports
20 the DER interconnection efforts in answering customer questions and shepherding the
21 communications to DER customers. It is estimated that approximately 25% of their time
22 is spent supporting New Hampshire DER interconnection applications. Technical
23 support of larger DER interconnections is provided by three distribution planning
24 engineers, and the Protection Department who analyze their associated interests of larger
25 DER applications. Additional support is also provided by the Metering Department and

1 Operations Departments in providing cost estimates and system asset installation as
2 needed.

3
4 For Liberty, the duties related to supporting net metering, facilitating interconnection and
5 customer-generator enrollment, as well as handling billing and maintenance, are assigned
6 to the Resource Planning, Engineering, Billing, Finance, Business Community and
7 Development, Project Management, Mapping, Operations, Regulatory, and Legal
8 departments. Within the Resource Planning department, one dedicated Resource
9 Coordinator oversees the assessment of net metering applications at Liberty. This
10 individual reviews and processes applications, furnishes project progress updates,
11 addresses inquiries about the net metering program from both customers and solar
12 developers, and manages the necessary data for mandated reporting. In cases where
13 supplementary review or study fees are required from customers, the coordinator drafts
14 payment documentation. The coordinator also works with the other teams to coordinate
15 necessary upgrades for solar installations. Monthly and annual reporting procedures also
16 fall within the coordinator's purview. The Coordinator's workload is exclusively
17 dedicated to fulfilling net metering responsibilities. The Engineering department consists
18 of three engineers dedicated for this efforts, two full time employees and one contractor
19 who dedicate approximately 25% of their time. One full time employee processes
20 residential and small applications, and the other full-time employee and one contract
21 engineer perform the analysis and administration for larger applications.

22

1 Liberty's Billing department resources that support net energy metering and billing include
2 three Billers (one Billing Supervisor, one Billing Specialist, and one Billing Analyst) who
3 dedicate 7% of their time. The work they support is similar to that described above by
4 Eversource and Unitil, including:

- 5 • Billing six different net metering programs under three tariffed rates;
- 6 • Exception processing of billed accounts: the systems kick out exceptions for Billing staff
7 to take the necessary action to credit the customer account;
- 8 • Monthly credit allocations and net meter credit payouts for Group Host accounts;
- 9 • Alternate net metering payouts and required correspondence yearly and quarterly;
- 10 • Standard net metering payouts and required correspondence yearly and quarterly;
- 11 • Allocation and payout approvals;
- 12 • Meter installs, exchanges and apply appropriate net meter program to each customer
13 account;
- 14 • Fielding customer questions, regulatory research;
- 15 • Monthly net metering controls reports; and
- 16 • Required reporting of customer allocations to Group Host account.

17 Additional support is provided by Finance, Business Community development, Project
18 Management, Mapping, Operations, Regulatory and Legal as needed.

19
20 **Q: Would application fees help balance the interests of customer-generators with those**
21 **of non-net metered electric utility customers?**

22 A: Yes. Consistently collecting standard application fees would ensure the scalability of
23 resources to support increased application volume and that customer-generators are
24 contributing to the costs of the unique systems and dedicated staff that enable their safe
25 interconnection and participation in net metering programs. Absent the collection of
26 these fees, the Joint Utilities will further support administrative requirements unique to

1 customer-generators from revenues collected through base rates charged to all customers.
2 Those amounts would also expand as interest in distributed generation and the
3 corresponding requirements to support that increased interest expanded.

4
5 **Q: Are there other anticipated benefits of approving an application fee structure for**
6 **customer-generators?**

7 A: Yes. Approved fees would provide responsive funding for the necessary Joint Utility
8 resources, enabling the Joint Utilities to more nimbly expand staff and enhance systems
9 to better serve customers as interest in distributed generation expands, minimizing any
10 lag by avoiding the lengthier process of making regulatory adjustments.

11
12 **Q. Is it the position of the Joint Utilities that the current net metering tariffs result in**
13 **just and reasonable rates?**

14 A, Yes it is.