STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DE 22-060

ELECTRIC DISTRIBUTION UTILITIES

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

Order on Net Metering

O R D E R N O. 27,074

November 18, 2024

On September 20, 2022, the Commission convened this docket to consider changes to net metering in New Hampshire as part of its obligation to "continue to develop and periodically review new alternative net metering tariffs," RSA 362-A:9, XVI, including whether any changes were merited by a study on the value provided by net-metering projects completed pursuant to Order No. 26,029 (June 23, 2017) in Docket No. DE 16-576.

As explained more fully below, the Commission will take the following actions:

- Retain the existing compensation levels for all net-metered customer-generators in the Alternative Net Energy Metering Tariff approved in Order No. 26,029 (NEM 2.0);
- Retain the exclusion of customer-generators with peak generating capacity greater than 1 MW, except for municipal hosts as required by statute;
- Authorize the implementation of application fees for individuals to interconnect as net-metered customers as laid out in this order;
- Retain the existing "legacy period" termination date of December 31, 2040 for all newly installed net-metered customers; and
- Establish further process to consider additional changes to the net-metering tariff as part of the Commission's ongoing obligation to develop and improve net-metering tariffs in New Hampshire.

I. BACKGROUND – NET METERING AND EXISTING TARIFFS

Net-metering is a system for compensating customers of electric distribution utilities who export energy onto the grid with small-scale power generation. *See* RSA 362-A:1-a, II-b, RSA 362-A:1-a, III-a. Because these customers both produce and consume electricity, they are called customer-generators. RSA 362-A:1-a, II-b. Distributed energy resources include entities that generate electricity through solar photovoltaic cells, wind, hydropower, and other methods. Order No. 26,029.

In 2017, pursuant to RSA 362-A:9, XVI(a), the Commission approved a new net-metering tariff, referred to as NEM 2.0, which replaced the then-operative "Standard Tariff" or NEM 1.0. *See* Order No. 26,029 (June 23, 2017); *see also* RSA 362-A:9, XVI(a) (requiring the Commission to continue to develop and periodically review new alternative net metering tariffs); RSA 362-A:9, I (authorizing the creation of the standard net-metering tariff). The terms of NEM 1.0 remained available for those customer-generators that had signed up for net-metering prior to the 2017 effective date of Order No. 26,029, with a termination date of December 31, 2040 (under RSA 362-A:9). The terms of NEM 2.0 govern the relations between customer-generators and the three investor-owned electric utilities in New Hampshire for all non-NEM 1.0 customers.

Under NEM 2.0, customer-generators do not receive compensation at a fixed price for the electricity they generate. Rather, the compensation they receive is based on the three primary rate components that New Hampshire's three electric utilities[1] charge their ratepayers for electric service. In order to understand how the

[1] The electric utilities are: Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), Unitil Energy Systems, Inc. (UES), and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (Liberty).

compensation mechanism works, a basic understanding of the relevant rate components is necessary. These rate components consist of:

(1) The distribution charge, the mechanism through which the utilities recover the costs for maintaining their intrastate distribution systems, which includes lines, transformers, and poles used to distribute electricity to ratepayers;

(2) The transmission charge, the mechanism through which the electric utilities recover the costs for their share of the maintenance expenses for New England's regional transmission system, which carries electricity across state lines (where it is then distributed through a utility's distribution system); and

(3) The default service charge, the mechanism through which the electric utilities recover the cost of purchasing and supplying electricity. In addition to the actual cost of electricity, the default service charge includes the costs for complying with the Renewable Portfolio Standards (RPS) legislation, Independent System Operator-New England (ISO-NE) capacity and ancillary charges, and the "risk premium" that utilities pay to procure electricity in the current auction process.

These three charges are all "volumetric charges," which means that the Commission sets a rate per kilowatt hour (kWh) and ratepayers are billed based on their actual electricity usage. Significantly, because these rates are adjusted by the Commission on a regular basis to reflect the utilities' revenue requirements, the actual compensation per kWh that customer-generators receive under the net-metering tariffs also fluctuates. In addition to these volumetric charges, which constitute the majority of customers' electric bills, ratepayers pay non-bypassable volumetric charges (including "system benefits," "stranded," and "storm" costs) and a fixed "customer charge."

With respect to the compensation received for net-metering, NEM 2.0 referenced three separate categories of customer-generators. *See generally* Order No. 26,029. The first category was "small customers," which included all customers with a total peak generating capacity of less than 100 kW. *Id.*

Table 1 – Small Customers - Monthly Netting and Monthly Exports

Bill Component	Compensation for **"*Monthly Netting*"** (when monthly production is less than or equal to consumption)	Compensation for *excess* energy **"*Monthly Exports*"** to the grid (when monthly production is greater than consumption)
Default Service (Energy)	100% Credit	100% Credit
Distribution	100% Credit	25% Credit
Transmission	100% Credit	100% Credit
Non-Bypassable	No Credit	No Credit

This category was created for customers with smaller individual effects on grid infrastructure, including residential solar customers. Under NEM 2.0, small customers' imports from the grid and exports to the grid are measured on a two-way meter and netted on a monthly basis resulting in "*monthly netting*" where customers are credited 100% for all default service (energy), distribution, and transmission costs when their production is less than or equal to consumption. *See id.* at 51–53. If small customers export *more* electricity than they import, they are credited for their *"monthly exports,"* and receive compensation for each exported kWh of electricity at a rate of 100 percent of the default service (energy) charge, 100 percent of the transmission charge, and 25 percent of the distribution charge. *Id.* at 1–2.

The credits that small customers receive – for both netted default service (energy) and excess default service (energy) exported to the grid under NEM 2.0 – are typically much greater than what a non-net-metered generator would receive if it sold electricity on the market, which would be limited to the actual cost of energy and not the full cost of default service (which, as noted above, includes the cost of energy, capacity and ancillary charges, renewable energy portfolio credits, and a default service procurement "risk premium"). Additionally, while the transmission and

distribution infrastructure stays fully in place to support small customers, their contribution towards the transmission and distribution costs may be significantly reduced, or in the case of "*monthly exports*" quite possibly go negative, thus shifting these costs from net metered to non-net-metered utility customers.

The second category is customers with total peak generating capacity between 100 kW and 1 MW. *See generally id.* These customers were referred to in Order No. 26,029 as "large customers."

Table 2 – Large Customers - Monthly Netting and Monthly Exports

Bill Component	Compensation for "***Monthly Netting***"	Compensation for "***Monthly Exports***"
Default Service (Energy)	100% Credit	100% Credit
Distribution	No Credit	No Credit
Transmission	No Credit	No Credit
Non-Bypassable	No Credit	No Credit

Unlike small customers, large customers' imports and exports to the grid are *not netted* on a monthly basis. Large customers pay the full price (inclusive of default service (energy), distribution, transmission, and the non-bypassable charges) on all electricity that they import from the grid and are compensated for their exports at the value of the kWh utility default service rate. Under this scheme, the compensation mechanism for large customers is significantly less generous than the mechanism for small customers since they are solely compensated for exports at the value of the default service price. That said, the default service (energy) price is still more than what a non-metered generator would generally receive for selling just energy in the market because, as noted above, default service includes other costs like capacity and ancillary charges, RPS, and the default service procurement "risk premium."

Finally, the third category is customers with total peak generating capacity between 1 MW and 5 MW, which the Commission will refer to as "large customers greater than 1 MW" for the purposes of this order. Customers within this range are generally ineligible for participation in net-metering. The only exception are entities that qualify as "municipal hosts" per RSA 362-A:1-a, II-c. Under the statute, a municipal host is defined as a "customer generator with a total peak generating capacity of greater than one megawatt and less than 5 megawatts used to offset electricity requirements of a group consisting exclusively of one or more customers who are political subdivisions, provided that all customers are located within the same utility franchise service territory." *Id.* Pursuant to statute, municipal hosts are compensated at the same rate as large customers. *Id.* Notably, in approving NEM 2.0, the Commission acknowledged that the legislature had mandated that municipal hosts be eligible for net-metering.

As is relevant to the parties' recommendations in this docket, Order No. 26,029 also provided a guaranteed time period during which these compensation levels would remain in place, stating that any net-metering installation "installed or queued during the period [that NEM 2.0] is in effect [shall] have their net metering rate structure 'grandfathered' until December 31, 2040." Order No. 26,029 at 72. Likewise, customer-generators who first enrolled in NEM 1.0 can remain on that tariff until December 31, 2040, at which point, by operation of statute, those NEM 1.0 Tariffs "shall terminate," and "such customer-generators shall transition to tariffs that are in effect at that time." RSA 362-A:9, XV.

In approving NEM 2.0, particularly as it applied to small customers, the Commission relied on the assumption that were net benefits of distributed generation to the utility distribution system that would justify compensation above the cost of

energy that could be procured on the market. *Id.* at 54–55. This was important because utilities recover their costs for compensating customer-generators from their ratepayers at large. In other words, if the electric utilities are going to pay more for electricity from net-metered customers than from other energy suppliers, and thus charge higher rates to all ratepayers, there must be some benefit net-metering provides general ratepayers to justify this higher expense. In Order No. 26,029, the primary identified benefit that net-metered customers provide ratepayers was in the form of "avoided costs" — or the costs that electric distribution utilities would have incurred had they purchased energy from non-metered customers. *Id.* In this sense, the rationale for net-metering compensation mechanisms is that they are essentially an investment by ratepayers to facilitate the development of distributed energy resources in the state, thus allowing all ratepayers to reap the benefits of avoided costs over the long term.

However, in Order No. 26,029, the Commission noted that there was insufficient evidence in the record to definitively conclude to what extent distributed energy resources would benefit ratepayers in the form of avoided costs. *Id.* at 54. For example, in ruling that the compensation rate for small customers for excess generation should include twenty-five percent of the distribution charge, the Commission noted that, "[b]ased on the limited evidence in the record, it appears that the actual net benefits of [distributed generation] to the utility distribution system *may* be less than 100 percent of the utility distribution rate component, but greater than zero." *Id.* at 54 (approving the twenty-five percent compensation on the grounds that it was "rough justice") (emphasis added).

To provide more concrete evidence on this important issue, the Commission directed its staff (now the DOE) to commission a Value of Distributed Energy

Resources (VDER) study to "provide more definitive information regarding the actual net costs and benefits of [distributed generation] system deployments." *Id.* at 54–55; *see also id.* at (59–62) (laying out the scope of the VDER study). The Commission stated that, after the completion of the VDER study, it would reevaluate net-metering compensation mechanisms based on the actual benefits of distributed generation resources to the New Hampshire distribution system.

As noted above, the Commission convened this docket in September 2022 to consider changes to NEM 2.0 pursuant to RSA 362-A:9 and Order No. 26,029. In October 2022, the DOE filed a VDER Study from Dunsky Energy Consulting that outlined its findings on the benefits of distributed energy resources in New Hampshire, which was amended twice with updated information.

On August 20 and 22, 2024, the Commission held a two-day evidentiary hearing in which it considered proposals from the numerous parties participating in this docket about appropriate changes to the net-metering program. The Commission directed that all parties seeking Commission action in this docket file pre-hearing statements outlining what actions they request the Commission to take, as well as post-hearing briefings reiterating their requests and citing the record evidence that supports them. The Commission received three alternative proposals from the parties. Both the New Hampshire Department of Energy (DOE) and Community Power Coalition of New Hampshire (CPCNH) filed their own position statements. The third proposal was in the form of an agreement between a coalition, which the Commission will refer to as the Joint Parties, which includes the Office of the Consumer Advocate (OCA), the Conservation Law Foundation, Clean Energy New Hampshire, Walmart, Inc., Standard Power of America, and Granite State Hydropower Association, and the electric utilities.

Because the evidence relevant to each recommendation is distinct, the Commission will address the evidence cited by the parties and make actual findings in its discussion of each proposal below.

II. LEGAL AUTHORITY AND STANDARD OF REVIEW

The legislature authorized the creation of a net metering program for eligible customer-generators in New Hampshire. *See generally* RSA 362-A:9. The legislature also stated that:

> The commission, through an adjudicative proceeding, shall continue to develop and periodically review new alternative net metering tariffs, which may include other regulatory mechanisms and tariffs for customer-generators, and determine whether and to what extend such tariffs should be limited in their availability . . . .

RSA 362-A:9, XVI. The statute further states that:

> In developing such alternative tariffs and any limitations in their availability, the commission shall consider:

1. balancing the interests of customer-generators with those of electric utility ratepayers by maximizing any net benefits while minimizing any negative cost shifts from customer-generators to other customers and from other customers to customer-generators;
2. the costs and benefits of customer-generator facilities;
3. an avoidance of unjust and unreasonable cost shifting;
4. rate effects on all customers;
5. alternative rate structures, including time-based tariffs . . . .;
6. whether there should be a limitation on the amount of generating capacity eligible for such tariffs;
7. the size of facilities eligible to receive net metering tariffs;
8. timely recovery of lost revenue by the utility using an automatic rate adjustment mechanism; and
9. electric distribution utilities' administrative processes required to implement such tariffs and related regulatory mechanisms.

RSA 362-A:9, XVI(a) (numbering added for clarity).[2]

Significantly, while net-metering is primarily associated with the compensation mechanism for customer-generators, setting net-metering compensation levels implicates the Commission's general ratemaking authority because utilities recover the cost of compensating customer-generators from their ratepayers through their rates. For this reason, the Commission's general obligation to ensure that all rates and fares charged by public utilities are just, reasonable, and in the public interest pursuant to RSA 374:2 and RSA 378:7 is applicable to establishing net-metering compensation schemes. Likewise, any party proposing a rate mechanism that would result in higher rates for ratepayers bears the burden of proving the proposal is just and reasonable. RSA 378:8.

In the Commission's view, the first factor in RSA 362-A:9, XVI lays out the overarching concern in establishing net-metering compensation levels, namely, how can the net-metering compensation mechanism maximize any net benefits of distributed energy resources, while minimizing cost-shifting onto general ratepayers? *See* RSA 362-A:9, XVI(a). This standard implicates two sub-questions. First, what are the benefits that distributed energy resources provide to New Hampshire ratepayers? Second, assuming there are benefits, what additional costs over the market price, if any, must ratepayers pay to receive the benefits of distributed energy resources? In this sense, the avoided costs distributed energy resources provide are relevant in two parts of the analysis because: (1) their long-term benefits may justify the initial

[2] CPCNH expends a significant portion of its post-hearing brief arguing that the standards espoused in RSA 362-A:9, XVI impose limitations on the Commission's discretion in this docket. But what CPCNH essentially argues is that this statute requires the Commission to consider certain factors in evaluating the proposed changes to the net-metering tariff and that the Commission cannot abuse its discretion by ruling arbitrarily or against the weight of the evidence. The Commission agrees with this interpretation of the statute, but that is the general standard for administrative agencies and not a higher standard as suggested by CPCNH. The Commission will comply with that standard in this order.

investment; and (2) more immediate savings generated by avoided costs may offset the cost of the initial investment. This overarching consideration must then be balanced against the remaining factors.

In reaching this conclusion, the Commission disagrees with the Conservation Law Foundation's argument that the Commission must consider the "public interest benefits," such as environmental and economic benefits, produced by distributed energy resources *even* if they do not impact rates. *See* Conservation Law Foundation Brief at 1–5. Specifically, the Conservation Law Foundation argues that the Commission's decision on net-metering compensation levels must be "informed" by the declaration of purpose in RSA chapter 362-A, which states that it is "in the public interest to provide for small scale and diversified sources of supplemental electric power to lessen the state's dependence upon other sources" and to "encourage and support diversified electrical production that uses indigenous and renewable fuels and has beneficial impacts on the environment and public health." RSA 362-A:1. The Conservation Law Foundation further cites that statute's assertion that:

> [N]et energy metering for eligible customer-generators *may* be one way to provide a reasonable opportunity for small customers to choose interconnected self generation, encourage private investment in renewable energy resources, stimulate in-state commercialization of innovative and beneficial new technology, enhance the future of diversification of the state's energy resource mix, and reduce interconnection and administrative costs.

Id. (emphasis added).

The Conservation Law Foundation acknowledges that RSA 362-A:9, XVI, quoted above, sets the standard for the Commission's review of alternative net-metering tariffs and does not expressly mention the environmental and social benefits produced by distributed energy resources. However, the Conservation Law Foundation argues that the requirement that the Commission consider the

"net benefits" of net-metering incorporates the statement of purpose's references to their environmental, social, and economic benefits. *See also* Conservation Law Foundation Brief at 2 (quoting portions of the legislative history of RSA 362-A:9, XVI in which legislators reaffirmed their support for distributed energy).

The Conservation Law Foundation's arguments require the Commission to interpret the statute. When interpreting a statute, the Commission looks first to the "the language of the statute itself, and, if possible, construe[s] that language according to its plain and ordinary meaning." *Polonsky v. Town of Bedford,* 173 N.H. 226, 229 (2020). "We interpret legislative intent from the statute as written and will not consider what the legislature might have said or add language that the legislature did not see fit to include." *Id.* "We construe all parts of a statute together to effectuate its overall purpose and avoid an absurd or unjust result." *Id.* "Moreover, we do not consider words and phrases in isolation, but rather within the context of the statute as a whole." *Id.* "This construction enables us to better discern the legislature's intent and to interpret statutory language in light of the policy or purpose sought to be advanced by the statutory scheme." *Id.*

Based on these principles of statutory interpretation, the Commission disagrees with the Conservation Law Foundation's interpretation that the "net benefits" that the Commission must consider implicate potential benefits that do not financially benefit ratepayers. As an initial matter, RSA 362-A:1 is a statement of purpose and not a substantive provision of the law. On its face, this language states that the reason for authorizing limited electric distribution pilot programs is because the state is trying to realize the benefits of distributed

energy resources and net-metering *may* be one way to realize them. Put another way, the statement of purpose indicates that the legislature believes there are ancillary benefits to distributed energy resources that may be realized from an effective net-metering program. But that itself is not a substantive standard for the Commission to consider in reviewing net-metering compensation levels.

This is important because the legislature did codify eight factors for the Commission to consider in reviewing net-metering tariffs in RSA 362-A:9, XVI. Significantly, none of these factors reference the environmental, social, and economic benefits *unrelated* to financial benefits. The legislature could have easily told the Commission to consider these benefits in setting compensation levels. It did not do so. On the other hand, it did state that the Commission must consider the costs of the program as balanced against the benefits multiple times. In fact, all eight factors listed relate, in some way, to assessing the cost of compensating customer-generators and balancing the benefits they provide with their costs to avoid "undue and unjust cost-shifting" between net-metered and general customers.

Significantly, unless the Commission is evaluating the financial costs and benefits to ratepayers, it is not clear how the Commission would evaluate cost-shifting between customer categories because neither category benefits from the external benefits as a member of that rate class. Moreover, the Commission does not know how it would factor benefits unrelated to reductions in rates into the cost-shifting analysis. For example, the Conservation Law Foundation argues that the Commission must consider reductions in pollution and increases in job opportunities resulting from distributed energy resources in its analysis. However, RSA 362-A:9 does not state how much pollution the Commission should seek to reduce or how many jobs the Commission should seek to create. In addition, there is no clear standard for the

Commission to apply to balance these benefits against higher electric rates. Notably, while balancing the financial costs and benefits of a program is within the Commission's traditional ratemaking role, evaluating the non-financial, ancillary benefits of distributed energy resources is not. *See generally* RSA 374:2, RSA 378:7, RSA 378:28 (enumerating the standard of setting "just and reasonable" rates based on the utility's actual expenses and its ability to make a return on its actual capital expenditures balanced against the ratepayers' interest in paying no higher rates than is necessary).

For these reasons, the Commission finds that the Conservation Law Foundation's interpretation is both contrary to the express language of the text and an unreasonable reading of the statute. Therefore, the Commission does not agree that it must consider the external benefits of net-metering that do impact implicate the costs and benefits to ratepayers in determining net-metering compensation levels.

III. ISSUES AND ANALYSIS

Having laid out the background and the standard for review, the Commission will turn to the actual proposals, submitted by the Joint Parties, the DOE, and CPCNH, with recommendations on how to retain or change the current net-metering tariff. In reviewing these proposals, the Commission will rely on the arguments and facts cited in the post-hearing briefs submitted by these parties, as well as a supplemental brief submitted by the Conservation Law Foundation in support of the Joint Parties' recommendations. For the ease of review, the Commission will analyze each proposal raised in the parties' positions statements separately, explain each party's position and the evidence cited in support of their positions, and the Commission's relevant factual findings and conclusions. Because some of the

recommendations the parties made overlap, the Commission will consider those together.

A. Compensation Rates for Small and Large Customers

The first issue is whether the Commission should adjust the existing compensation levels for small and large customer-generators and, if so, what those new compensation levels should be. All of the parties maintain that the Commission should retain the current compensation levels for small and large customer-generators. *See supra.* The parties, relying on the Dunsky Report and the testimony of their witnesses, maintain that these compensation levels are appropriate because distributed energy resources create significant benefits for all ratepayers in the form of avoided costs.

Having reviewed the record, including the Dunsky Report and the witness testimony, the Commission is not convinced that the parties have sufficiently demonstrated that distributed energy resources have provided significant benefits to *all* New Hampshire ratepayers that would justify compensation above the cost of energy that net-metered customers receive. *See* RSA 362-A:9, XVI (stating that net-metering compensation levels should not result in undue cost-shifting between customers). Specifically, while the parties primarily rely on the Dunsky Report's findings to support their position that the current net-metering tariff compensation levels are consistent with RSA 362-A:9, XVI, the Commission has concerns about several of the assumptions underlying the Dunsky Report's analysis and conclusions.

The Commission finds that the Dunsky Report's evaluation of cost-shifting did not adequately distinguish between the benefits of distributed energy resources accruing solely to net-metered customers as opposed to solely non-net-metered customers. The Commission finds this distinction important because to determine

that the net-metering program provides benefits to all customers by avoiding unreasonable cost-shifting onto non-net-metered customers, it is necessary to look at net-metered and non-net-metered customers separately.

In addition, the Dunsky Report attributed significant savings to the transmission charge and capacity charge components, which represented about 39.9 percent of total savings in 2021 and about 45.6 percent in 2035, which is the latest date the report forecasted savings. *See* Exh. 8, Appendix Table 7; Exh. 9, Appendix Tables 7–8. Notably, when estimating capacity cost avoidance, these savings assume a constant system-wide peak period for the system's load of between 3 and 4 p.m. in the estimation of future savings. *Id.* However, there is no explanation in the Dunsky Report as to why it assumed the peak period was between 3 and 4 p.m. and the parties did not introduce any evidence to support this assumption. In addition, there is no explanation as to why the Dunsky Report assumed that the peak period would remain constant between 2021 and 2035. In the Commission's view, how increased solar generation shifts the New England system wide peak or monthly coincidental peak requires proper attention in informing future capacity and transmission costs avoidance analysis. Given the absence of such support, the Commission has reservations regarding the reasonableness of Dunsky Report's estimation of forecasted savings. In light of the Commission's concerns with the Dunsky Report, the Commission cannot sufficiently rely on it to find that the net-metering compensation levels are definitively consistent with RSA 362-A:9, XVI. At the same time, there is insufficient evidence in the record that any alternative compensation level would be more consistent with RSA 362-A:9, XVI than the existing compensation levels. Accordingly, we will retain the existing compensation levels pending further process.

B. Eligibility for Participation by Large Customers Greater than 1MW[3]

The next issue is whether the Commission should expand eligibility for net-metering to allow large customers greater than 1MW to participate in the program. Because municipal hosts are already eligible to participate in net-metering, this expansion of eligibility would only apply to large customers greater than 1MW who are not municipal hosts. All of the parties recommended that the Commission make no changes to the net-metering tariff with respect to these customers.[4] To support this position, the Joint Parties cited witness testimony that a significant number of large customers greater than 1MW were willing to interconnect and sell energy into the grid at market prices.

The Commission agrees that the evidence does not support expanding eligibility for net-metering to allow all large customers to participate. There was no evidence presented that customer-generators in this category required compensation above the market rate to interconnect with the distribution grid at a level that would provide benefits to New Hampshire ratepayers. Accordingly, the Commission finds that it is appropriate to continue excluding large customers greater than 1MW from eligibility in net-metering (except municipal hosts) and thus accepts the parties' recommendation.

C. Legacy Period

The next issue is whether the Commission should approve the Joint Parties' recommendation to establish a new "legacy period" for newly installed customer-

[3] The legislature directed the Commission to consider this issue in this docket. *See* RSA 362-A:9, XXIII. The Commission views this section as complying with its statutory obligations. The Commission will continue to consider and review alternative net-metering tariffs, included as applied to large customers, pursuant to RSA 362-A:9, XVI.

[4] The DOE argues that the Commission should extend the eligibility for participation in net-metering to large customer-generators if they qualify as municipal hosts pursuant to RSA 362-A:1-a, II-c. But, as the Commission understands, these customer-generators are already eligible for participation in net-metering pursuant to that statute, and thus the DOE does not appear to be recommending any changes to the law. Of course, the electric utilities may need to update their net-metering tariffs to reflect the eligibility of large customers who qualify as municipal hosts.

generators that would allow them to receive the compensation levels approved in this order for twenty years from the date they interconnect from the electric utilities. This is a change from the existing “legacy period” — referred to as a “grandfathering” clause incorporated into the Commission's Order No. 26,029, which established the parameters for NEM 2.0 — for customers who enrolled under NEM 2.0, which is a hard date of December 31, 2040, regardless of when the customer-generator interconnected to the system. This requirement of Order No. 26,029 and NEM 2.0 is mirrored by a statutory termination point for the "standard" NEM 1.0 Tariff structure, which is also fixed by RSA 362-A:9, XV as December 31, 2040. Both the Joint Parties and CPCNH support this recommendation on the grounds that the extended legacy period is necessary to encourage investment in net-metering by providing reassurance to homeowners and third-party financiers that they will be able to recover their investments. For its part, the DOE objects to the recommendation on the grounds that there is already a legacy period in place until the end of 2040, the parties have already committed to revisiting compensation levels in the next two years, and that creating a new legacy period that would only apply to customers within a narrow two-to-three year window could both create market distortions and administrative burdens for the electric utilities.

The Commission will first discuss the arguments and evidence presented by the proponents of this proposal. Because the Joint Parties (and CPCNH) offered different rationales and evidence in support of their proposal with respect to residential customers (who mostly fall within the small customer category) and commercial customers (who mostly fall within the large customer category), the Commission will discuss these categories separately.

With respect to commercial installations, the Joint Parties cited the testimony of David Littell and R. Thomas Beach of Clean Energy New Hampshire, which is a non-profit organization that educates and advocates for sustainable energy in New Hampshire and represents more than 500 members with interests in net-metering, including residential, municipal, and commercial interests. *See* Clean Energy New Hampshire Petition to Intervene. The Joint Parties also cited the testimony of Robert Hayden of Standard Power of America, which is a "full-service energy broker and consultant for the New England Area," which has provided "third-party electricity, solar development and installation" and "administers twenty-seven hydroelectric plants." *See* Standard Power of America Petition to Intervene. In addition, they cited a table (included as Attachment B to Exhibit 1) produced by Clean Energy New Hampshire that purports to show the profitability of large commercial solar installations under different net-metering compensation scenarios.

In essence, Mr. Littell and Mr. Hayden both testified that legacy periods for net-metering compensation levels were necessary to stabilize the distributed energy resource market because larger projects require third-party financing and third-party financiers will not provide financial investment without a guarantee of compensation levels. Mr. Hayden testified that some type of guarantee about net-metering compensation levels was necessary because it was "very rare" for distributed energy projects to be profitable without the higher compensation levels net-metering provides. Trans. (Day 1) at 141. For his part, Mr. Littell testified that the primary rationale for the legacy period is the ability to obtain financing from third parties, and not necessarily the actual profitably of the commercial installation. *See id.* at 300 (Mr. Littell testifying that, "it's a matter of the ability to finance. It's not that there might be

additional revenue out there beyond what's here. The folks that are providing the financing won't say that's sufficient and put the money forward.").

As to why the specific proposed twenty-year legacy period was appropriate, the witnesses offered several reasons. First, Mr. Hayden testified that for larger projects there is a "traditional finance period of 20 years," so the proposed guarantee was "a normal range of time that investors consider for solar projects." *Id.* at 295. Second, and relatedly, Mr. Littell testified that third-party financiers would not provide funding with only a 10-year guarantee of compensation levels. He testified that for this reason, the membership of Clean Energy New Hampshire had informed him that they were having difficultly financing their projects under the existing legacy period of 2040. Likewise, Mr. Hayden testified that the proposed legacy period was necessary because the "frugal" nature of the existing net-metering program already created "a tight budget." *Id.* Moreover, according to Mr. Hayden, the slow nature of interconnection meant that projects were already experiencing difficulty because under the effective fifteen-to-sixteen-year guarantee currently in place, the "projects won't work." *Id.* Mr. Hayden based this opinion off "examples of projects that won't complete if there's only fifteen or sixteen years of net metering benefits." *Id.*

Third, both witnesses referenced Attachment B as demonstrating that commercial solar installations required the twenty-year legacy period to be profitable. According to Mr. Littell, the numbers in Attachment B were "provided by a specific New Hampshire member who does a lot of work in New Hampshire" and that the scenarios discussed in that attachment are "median assumptions for financing projects." *Id.* While neither witness walked through Attachment B on direct examination, the DOE questioned them about several of the assumptions in Attachment B on cross-examination. On cross, Mr. Littell testified that Attachment B

provides six scenarios demonstrating the profitably of large net-metered projects under different investment environments. According to Mr. Littell, the first four scenarios assume that the Commission does not extend the legacy period past 2040 and show that distributed energy projects will not generate a profit under these circumstances. *See id.* at 159–60. Mr. Littell further testified that, in addition to the lack of existing compensation levels, these scenarios also assume both that there will be no net-metering program in place in 2040 and that customers will be unable to generate *any* revenue from their projects after that year. *See id.* at 160. However, despite this assumption in the attachment, Mr. Littell testified that, even if there was no net-metering program past 2040, these projects would likely continue to sell power through bilateral contracts. He testified, however, that the reduced amount they would likely receive—based on current market prices—would not be sufficient to attract investment. *Id.* at 160–61.

With respect to small customers, the OCA's witness, Timothy Woolf, the Vice-President of a consulting firm specializing in electricity and gas industry regulation, planning, and analysis, testified that there is "a different calculus for homeowners than for the larger . . . customers." Id. at 290. According to Mr. Woolf, while the issue with commercial customers is securing third-party financing, the issue with residential customers is providing a guarantee to homeowners that they will recoup the expenses they incur in entering into rooftop solar contracts with third-party developers, which is the prevailing model for rooftop solar. Specifically, he testified that third-party developers primarily market their product to homeowners by advertising the savings they will earn through lower electric bills. According to Mr. Woolf, these vendors will "often" say "we can give you a payback period of seven, ten, whatever years." *Id.* According to Mr. Woolf, "if they were to come along and say, oh,

we can't tell you what's going to happen in year five, because we're not grandfathered, and everything up to year five could be totally different," they would "lose a lot of customers." *Id.* at 290–91. According to Mr. Woolf, that is the reason for grandfathering, "to give certainty to residential customers as to what they get when they put their money down." *Id.* at 291.

Likewise, Mr. Littell testified that "residentials need [the certainty] of a payback." *Id.* at 293. As an example, he testified that, in "Maine, for a short time period, we had the Commission adopt a form of net metering that just really didn't work. And even the residential market, everything just fell off. All of the solar companies in Maine were coming over to New Hampshire during that time period to try to stay afloat." *Id.* at 293. Mr. Littell continued that the Maine example showed that the length of the legacy period "makes a difference, even for the residential market, where people are not motivated, in my estimation, primarily to save money, but they still don't want to pay $15,000 to $20,000 for something on the rooftop that, you know, they—they are not sure they're—what economic [benefits there] are after five years." *Id.*

With respect to the required length of a legacy period, Brian Rice, the Director of Customer Solar Programs at Eversource, testified that, "[t]hird-party ownership . . . is a common model for residential customers to acquire distributed generation" and his "understanding [was that] probably these terms are fifteen, twenty years." *Id.* at 300. Notably, Mr. Beach of Clean Energy New Hampshire testified that the payback period for residential solar varied, "ranging from between nine and fourteen years." *Id.*

CPCNH presented the testimony of its president Clifton Below, who supported the twenty-year legacy period proposed by the Joint Parties as a means of providing a more secure investment environment. Mr. Below acknowledged that there were

potential concerns about "lock[ing] in" net-metering compensation levels for long periods of time but noted that compensation levels were only one part of the total credit paid to customer-generators. Trans. (Day 2) at 115–16. Thus, according to Mr. Below, even if the Commission were to approve the proposed legacy period, the amount that net-metered customers would receive would still vary depending on the value of the underlying rate elements (namely, the distribution, transmission, and default service rates). *Id.* at 116. Mr. Rice echoed this sentiment, noting that one of the reasons the Joint Parties supported the continuation of the existing compensation levels was it was a "market-based compensation structure," that would be responsive to changes in the energy market because the largest component of the net-metering credit was the default service rate, which fluctuates depending on energy prices. Trans. (Day 1) at 219.

Having reviewed these arguments and evidence, the Commission will evaluate whether the Joint Parties (and CPCNH) have met their burden to show that the proposed twenty-year legacy period for all newly-installed customer-generators is necessary for either commercial or residential installations.

With respect to larger, commercial installations, the Commission does not believe that the Joint Parties and CPCNH have submitted sufficient evidence to show that any legacy period is necessary to secure investment, never mind a twenty-year legacy period. The primary evidence in support of the necessity of a legacy period is the testimony of Mr. Littell and Mr. Hayden that the legacy period was necessary because third-party financiers would not otherwise invest in large commercial distributed energy projects. Notably, both witnesses testified that they based their opinions on their awareness of individuals and projects attempting to get financing for distributed energy resource projects.

The Commission does not believe that these unspecified, anecdotal reports about unidentified individuals and projects are sufficient evidence to establish the need for an expanded legacy period. The Commission does not know what projects are at issue, whom they have sought funding from, and what other reasons there might be to explain their difficulties in obtaining funding. For this reason, the Commission has no idea whether these anecdotal reports reflect actual financing conditions for commercial distributed energy resource projects in New Hampshire or the specific circumstances of these unidentified individuals.

In addition, the Commission does not believe that the witnesses adequately considered how the extension of the legacy period for newly-installed customer-generators would shift financial and business risk from customer-generators and investors onto non-net-metered customers, and ratepayers at large. In the Commission's view, this is a central consideration to ensure that costs are not being unduly shifted onto ratepayers at large.

Even if these witnesses had proven that investment would not occur absent a legacy period, they have not shown that the twenty-year legacy period proposed is necessary. The primary evidence the Joint Parties cite to establish the need for the twenty-year period is Attachment B, which is a table that purports to show the long-term profitability of 1 MW and 4.99 MW solar installations under six different net-metering compensation schemes. The Commission is not persuaded by Attachment B for several reasons. First, the document is not self-explanatory and the Joint Parties' witnesses provided no explanation of it in their direct testimony. While the Commission acknowledges that it is supposed to show that larger solar installations will not be profitable absent a twenty-year legacy period, the Commission does not see how the figures demonstrate that proposition. Second, the information in Attachment

B is unverified. Mr. Littell testified that the information was provided by a member of Clean Energy New Hampshire but did not explain who this member was or where he or she obtained this information. Therefore, the Commission has no basis to accept that the numbers in the table are accurate. Third, Attachment B appears to rely on dubious assumptions. For example, Mr. Littell testified that the table assumed that there would be no revenue for large installations after 2040. However, he also testified that this assumption was unlikely because, even assuming there is no net-metering program in place at that time, the projects could still sell their electricity on the market. For these reasons, the Commission does not find Attachment B compelling evidence.

Outside of Attachment B, there was little other evidence presented in support of the twenty-year period. Mr. Littell asserted in his testimony that financiers would not finance the projects with only a ten-year guarantee about the compensation levels. The Commission does not find this unspecified and general description sufficient evidence, in large part because the Commission does not know on what sources or data Mr. Littell is basing this observation. In addition, Mr. Hayden testified that the twenty-year period was consistent with the period usually set for long-term financing agreements and that they were appropriate for that reason. But the absence of a twenty-year legacy period for net-metering compensation levels will not itself prevent investors from entering long-term financing agreements. Therefore, the prevalence of twenty-year financing agreements does not itself justify the imposition of a twenty-year legacy period.

With respect to smaller customers, the Commission finds the Joint Parties and CPCNH have likewise failed to meet their burden to support an extension of the legacy period. In support of the twenty-year legacy period for residential customers, the

Conservation Law Foundation cited the testimony of Mr. Woolf, Mr. Beach, and Mr. Littell as establishing that without the twenty-year legacy period, "consumers *may* be unwilling to invest in small behind-the-meter rooftop solar projects because of uncertainty regarding project payback periods." CLF Brief at 4 (citing Trans. (Day 1) at 288–294) (emphasis added).

Nothing in these witnesses' testimony supports the proposition that a twenty-year legacy period is *necessary* to ensure that residential consumers continue to invest in rooftop solar. At most, they testified that a guarantee that they would recoup their investment within a particular timeframe—a "payback period"—was important to consumers and was thus an important part of the sales pitch for residential solar developers. *But see* Trans. (Day 1) at 288–294 (Mr. Littell testifying that, based on his experience, it may not be the primary motivation for many residential solar customers who are more motivated by environmental consciousness). However, the need for a "payback period" does not itself prove the necessity of the proposed legacy period to secure residential investment in rooftop solar. Simply put, there is insufficient evidence in the record that third-party residential solar developers will be unable to effectively enroll homeowners in contracts for rooftop solar absent a legacy period for the net-metering compensation mechanism. While Mr. Littell testified that Maine experienced a decrease in residential solar participation after that state altered its legacy period, he did not testify to any of the pertinent facts about that experience, such as what the prior legacy period was, what it was changed to, and whether Maine's net-metering compensation levels were comparable to NEM 2.0, and thus the Commission cannot draw any conclusions from Maine's experience.

In addition, even if it was established that a legacy period was necessary to secure investment in residential solar, the evidence does not support the need for the

twenty-year legacy period proposed. The only evidence about the average payback period for residential solar came from Mr. Woolf, who testified that the average payback period was between nine and fourteen years. There is thus no evidence that the proposed twenty-year legacy period is necessary.

For the foregoing reasons, the Commission finds that the Joint Parties have not shown that a twenty-year legacy period (beyond the existing December 31, 2040 termination date for NEM 2.0) is necessary to secure investment in commercial or residential customer-generator installations. Therefore, the Commission will not approve such a modified, extended legacy period in this order.

D. Application Fees

The Joint Parties next recommend that the Commission authorize application fees for customer-generators seeking to enroll in a utility's net-metering program based on the size of the project. *See* Exh. 1, Attachment C (containing the Joint Parties' New Hampshire Customer-Generator Application Fee Proposal). Specifically, the Joint Parties recommend the following fees:

Table 3

Project's Total Peak Generating Capacity	Fee
≤ 25 kW	$200
25 kW to 100 kW	$500
> 100 kW	$1,000

Id.

The three electric utilities would use these fees and apply them to qualifying expenses, which would include costs for staff, services, and systems that are required

to efficiently process customer-generator applications to interconnect to the grid in a manner consistent with applicable rules and statutes. *See id.*

The Joint Parties further propose that each company would file an annual reporting and reconciliation of the revenue they receive from the application fees, which the Joint Parties contend should occur during a pre-existing rate reconciliation mechanism. Any overcollections will be credited to ratepayers using this mechanism. On the other hand, undercollections will not be collected from ratepayers using this mechanism without prior authorization from the Commission. However, the parties request that the Commission approve a change to fee amounts in the annual filing to "achieve better alignment of revenues and administrative expenses in future years." Exh. 1 at Bates Page 31. Each utility will bear the burden in each filing of demonstrating that its administrative costs were incurred directly in support of the interconnection processes for customer-generators. *Id.* The Joint Parties stated that Eversource would submit this filing in its annual reconciliation for its Stranded Cost Recovery Charge and UES would submit the filing in the annual reconciliation of its External Delivery Charge. *Id.*; *see also* Trans. (Day 1) at 148. The proposal does not specify where Liberty would submit this filing. At hearing, Liberty's witness testified that it would likely use its Stranded Cost Charge but could also utilize another reconciling mechanism. *Id.* at 148–49.

The Joint Parties argue that the proposed application fees are appropriate because they will allow the electric companies to recoup the costs of administering the programs from participants and thus prevent shifting the cost onto general ratepayers. With respect to the actual amount for each fee, Mr. Rice of Eversource testified that they derived these fees by assessing the actual costs to the utilities of administering the net-metering programs. He further testified that they compared the fees to those in

comparable jurisdictions and confirmed that they were commensurate with similar fees in those states. Both the DOE and CPCNH agree that this proposal is appropriate, including that the specifically proposed fees are reasonable, and recommend that the Commission adopt it.

The Commission agrees with the parties that the proposal for application fees, including the proposed fee amounts, and the proposed annual reporting and reconciliation mechanism are appropriate. Specifically, the Commission finds that both features are appropriate because they will reduce cost-shifting from net-metered to general customers. In addition, the Commission accepts Mr. Rice's testimony that the proposed fee amounts are reflective of the utilities' actual administrative costs relative to interconnection applications, and appreciates that there is a feature in the reconciling mechanism that will allow these fees to be adjusted in the future if appropriate. The Commission thus approves the Joint Parties' proposal—outlined in Attachment C to Exhibit 1—in full. With respect to the specific existing mechanism for each utility, the Commission agrees that Eversource should utilize its Stranded Cost Recovery Mechanism and UES should utilize its External Delivery Charge to reconcile the application fee overcollections. The Commission directs Liberty to submit a filing stating the existing mechanism they intend to reconcile the application fee revenue in within five days of the date of this order.

E. Time-of-Use Rate, Data Collection Efforts, and Stakeholder Process

The Joint Parties next propose that, subsequent to this order, the electric utilities undertake an eighteen-month data collection effort that further eluc*id*ates the costs and benefits of net-metering to residential customers. Per their proposal, the Joint Parties would confer after the Commission issues this order to agree on the data elements to be collected. This process would include the electric utilities obtaining

data relevant to net-metering time-of-use (TOU) rates. According to the proposal, the electric utilities will develop TOU rates based on these efforts and file a petition for the Commission to review and approve the TOU rates in an adjudicative docket within two years of the date the Commission issues this order. Both the DOE and CPCNH support this proposal.

The Commission agrees with this proposal in part but finds that the data collection effort should occur in this docket and on a timeframe set in a supplemental order of notice after the Commission issues this order. This decision is based, in part, on the Commission's desire for more regular updates from the parties involved in the data-collection effort to ensure that the process is running efficiently. The Commission has an obligation under RSA 362-A:9, XVI to continue to review and develop alternative net-metering tariffs. The evidence in this docket and the parties' briefs have raised numerous issues related to net-metering that the Commission believes merit further consideration and review. Accordingly, the Commission will issue a supplemental order of notice outlining the process for this additional review, which, as described below, will also include several issues raised by CPCNH.

F. CPCNH Requests for Additional Review

In its pre-and post-hearing filings, CPCNH recommended that the Commission direct the electric utilities, as well any other parties interested in participating, to convene working groups to discuss several issues related to net-metering in addition to the TOU study recommended by the Joint Parties and DOE. These issues include: (1) whether exports to the grid by customer-generators taking default service should be accounted for as a reduction to what would otherwise be the wholesale load

obligation of the load serving entity providing default service to the grid;[5] and (2) how customers of suppliers other than the utility can receive credit for actual avoided ISO-NE Forward Capacity Market charges by reducing the capacity load obligation.

Similarly, CPCNH has made several recommendations that the Commission order the electric utilities, within varying lengths of time, to file proposals to: (1) allow distributed storage to participate in net-metering; (2) exclude RPS compliance costs from the default service supply credit net-metered customers receive; (3) credit customer-generators with total peak generating capacity greater than 100 kW for actual avoided transmission costs; and (4) prevent the dual participation of customer-generators in both the state net-metering program and the ISO-NE market. CPCNH proposes that, after the utilities submit their proposals, the other parties will have the opportunity to conduct discovery and submit evidence in favor or against them.

In their brief, the Joint Parties objected on the grounds that CPCNH did not introduce sufficient evidence to establish whether CPCNH's numerous proposals would result in just and reasonable rates and avoid undue cost shifting. Accordingly, the Joint Parties contend that these additional changes require further investigation and development prior to being approved.

As the Commission interprets CPCNH's requests, CPCNH is not asking the Commission to take immediate action on the record before it. Although it recommends several different processes depending on the recommendation, it is essentially requesting that the Commission direct the parties to engage in further process to

[5] CPCNH notes, and the Commission acknowledges, that RSA 362-A:9, XXI(a) directed the Commission to "use its best efforts to resolve [this] question through an order in adjudicative proceeding . . . issued no later than June 15, 2022." *See* CPCNH Brief at 5 (quoting RSA 362-A:9, XXI(a). The Commission did not provide notice of this issue in its September 20, 2022 order commencing this docket, however, and there is an insufficient evidentiary record for the Commission to rule on this issue in the current order. Accordingly, the Commission will provide additional process to consider this issue in this docket after its uses this order.

consider additional changes to the net-metering tariff. To this end, the Commission does not believe CPCNH's proposals are necessarily inconsistent with the Joint Parties' position on these issues—i.e., both believe that these additional changes require further development and review prior to implementation.

The Commission favors a competitive environment because that ultimately benefits ratepayers at large, whether they are served by the utilities, competitive energy suppliers, or community power aggregators. The Commission agrees that CPCNH's proposals merit further consideration. The Commission, however, does not agree with the processes proposed by CPCNH. Specifically, while the parties are free to discuss any issue they choose to amongst themselves and to engage in data collection as they see fit, the Commission will not endorse the creation of a "working group." The Commission also disagrees with CPCNH's requests to direct the utilities to develop new tariffs on distributed storage and avoided transmission costs as the first step in the development of those recommendations. The Commission believes it would be more appropriate to establish the necessity and parameters of these changes based on an established record in the first instance. Accordingly, the Commission will notice the changes CPCNH has proposed in the order of notice the Commission will issue after this order to consider additional changes to the net-metering tariffs.

Based upon the foregoing, it is hereby

ORDERED, that the existing compensation levels in NEM 2.0 for all categories of net-metering customer-generators, which were approved in Order No. 26,029, shall remain in place; and it is

FURTHER ORDERED, that the Eversource, UES, and Liberty are authorized to assess application fees to individuals or entities seeking to interconnect as net-

metering customer-generators consistent with the parameters laid out in Attachment C to Exhibit 1; and it is

FURTHER ORDRED, that Eversource, UES, and Liberty are authorized to begin assessing the approved application fees on January 1, 2025; and it is

FURTHER ORDRED, that Liberty shall file notice to the Commission of which existing rate mechanism it intends to file for its annual reconciliation of the interconnection fees within five days of this order; and it is

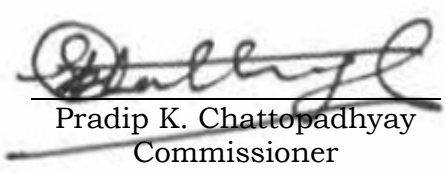
FURTHER ORDERED, that Eversource, UES, and Liberty shall file properly annotated tariff pages in compliance with this order, as required by N.H. Code Admin. Rules Puc 1603 no later than 15 days from the issuance of this order; and it is

FURTHER ORDERED, that the Commission retains the existing "legacy period" termination date of December 31, 2040 for all net-metered customers; and it is

FURTHER ORDERED, that the Commission shall issue an order of notice to review and adjudicate additional proposals related to the net-metering program and tariffs pursuant to its obligation to continue to review and develop net-metering tariffs under RSA 362-A:9, XVI.

By order of the Public Utilities Commission of New Hampshire this eighteenth day of November, 2024.

Daniel C. Goldner
Chairman



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Docket#: 22-060

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