

FOR COMMUNITIES, BY COMMUNITIES.

NH EBT Working Group



Meeting #2 | February 13, 2024 | 10 A.M.

**COMMUNITY
POWER COALITION**
OF NEW HAMPSHIRE



Agenda

- 1 | Market Context
- 2 | Membership
- 3 | Scope & Process
- 4 | Proposed Structure, Workflow & Facilitators
- 5 | Proposed Next Steps

Market Context



Rapid growth in Community Power Aggregation (CPA) supply service:

- ⚡ CPCNH is now 2nd largest default service provider
- ⚡ Current adoption rate suggest majority of customers switching to CPAs over 2-3 years

Alignment with legislative, regulatory, and market requirements:

- ⚡ Utility Restructuring Act & 1998 NH EBT Standards
- ⚡ LEEPA statute (including net metering)
- ⚡ Puc 2200 rules

Need to implement corresponding EBT changes + coordinate with CPAs / CEPS

Going-forward considerations:

- ⚡ Various ongoing proceedings
- ⚡ Integrations with Statewide Data Platform
- ⚡ Inflation Reduction Act (IRA) data access requirements
- ⚡ FERC Order 2222 load settlement pathways & NEPOOL Meter Reader Working Group
- ⚡ Coordination with Grid Modernization Advisory Group

Membership



1998 Consensus Plan

“The group is comprised of representatives from each utility, the Commission staff, and several competitive power suppliers.”

2023 Preliminary Commission Guidance (Order No. 26,903)

In addition to utilities, include *“various classes of users of the system including various competitive providers and other customer representatives.”*

Utilities

NHEC
Unitil
Liberty
Eversource

EBT Vendors

EDI: ESG, Systrends
(Liberty), Calpine (CPCNH)
Settlements: ABB
(Eversource), CGI (other 3
utilities)
Billing: NISC (NHEC), Itron
(other 3 utilities)
UtilityAPI?
Others?

Competitive Providers

CPCNH
Calpine
NRG / Direct
Octopus
Other CEPS
Retail Energy Advancement League (REAL)?
Retail Energy Supply Association (RESA)?
Energy Systems Integration Group (ESIG)?
Solar Energy Industries Association (SEIA)?

DER Aggregators?
Standard Power
Freedom Energy
Colonial Power
Other brokers

Other customer reps

OCA
Mission:Data?
Clean Energy NH (CENH)?
Others?

Scope & Process



1998 Consensus Plan

Step 1: define business relationships (which entities are responsible for doing what, and by when):

*The task of the **Business Rules Subgroup** was twofold: to reach agreement on a standard set of data transactions that meet the basic informational needs of each market participant; and to formulate business rules for each standard transaction. In an effort to reach consensus on these issues, the subgroup examined the likely relationships between customers, competitive suppliers and distribution companies as retail competition develops.*

Step 2: define corresponding standard transaction set and business rules for metering, EDI, billing, and settlements (how each entity will carry out its responsibilities):

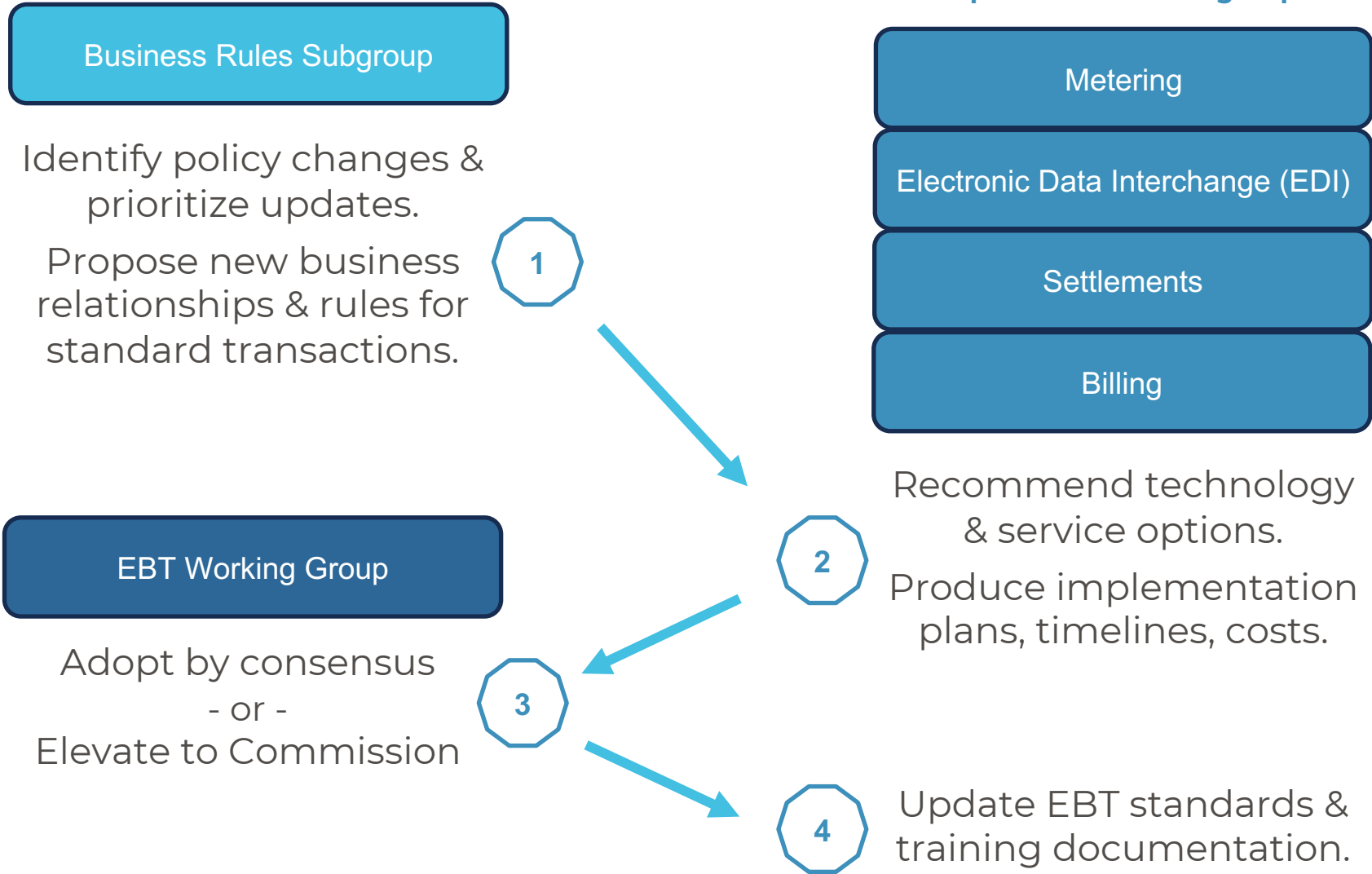
*The **Implementation Subgroup**'s primary task was to review the technologies and services available for transferring large volumes of electronic data and to make recommendations which ensure the smooth and timely implementation of retail access in 1998. The subgroup was also responsible for developing recommendations on the format of the electronic files and for producing training and systems testing manuals for use by competitive providers."*

2023 Preliminary Commission Guidance (Order No. 26,903)

Working Group should determine "whether the current EDI system is meeting the evolving electric system needs and if not, what changes may be required, and at what cost", and "also consider whether the statewide Data Platform currently under development, see Docket DE 19-197, will interface with, or replace the utilities' EDI systems."

2024: Commission proceeding on EBT Standards anticipated

Proposed Structure & Workflow



Proposed Chairs / Facilitators



EBT Working Group

DOE, CPCNH & Utility rep?

Business Rules Subgroup

DOE: Amanda Noonan, Matthew Young, Liz Nixon

OCA: Don Kreis

CPCNH: Samuel Golding

Utilities: (?)

Implementation Subgroups

Melyssa Flaherty (Liberty)?

1. **Metering** (?)
2. **EDI** Monica Neibert (ESG)
3. **Settlements** (?)
4. **Billing** (?)

Proposed Next Steps



1. DOE administrative updates (website, listserv, etc.)
2. Finalize chairs / facilitators
3. Establish regular meeting schedule
4. Discuss membership outreach
5. Agree upon next-step deliverables:

Business Rules Subgroup

- Identify changes to implement requirements

- Propose prioritization for implementation subgroups

Implementation Subgroups

- Identify technical POC(s) at each utility

- Confirm scope of current utility services (see tables on next slides)

- Begin reporting back on planned / ongoing updates

Implementation Subgroup: EDI

To confirm and keep updated



CPCNH's understanding as of 2/6/24	Eversource	Liberty	Unitil	NHEC
ELECTRONIC DATA INTERCHANGE SERVICE				
<i>Customer's Current Billing Month Usage Data File</i>				
2-part TOU usage data	Yes	No	No	Yes
3-part TOU usage data	N/A	No	No	N/A
NEM usage data	No	No	No	Yes
Interval usage data	No	No	No	No
<i>Customer's Historic Usage Data File (12 Prior Months)</i>				
2-part TOU usage data	No	No	No	Yes
3-part TOU usage data	N/A	No	No	N/A
NEM excess generation data	No	No	Yes	Yes
Interval usage data	No	No	No	No
<i>Customer's Account Data</i>				
Billing Cycle	Yes	Yes	No	Yes
Distribution Tariff Rate	Yes	Yes	No ¹	Yes
Default Supply Rate Election	N/A	N/A	No ²	N/A
NEM flag	Yes ³	Yes ³	Yes ³	N/A ³
NEM tariff (1.0 or 2.0)	No	No	No	Yes ³
Group NEM (host or member)	No	No	No	Yes

Table Footnotes
? - Question marks indicate fields still under assessment.
1 - Unitil only identifies the wholesale supply group (e.g., "Residential") which cannot be used to identify customers on TOU rates.
2 - Unitil allows customers to elect monthly variable supply rates (instead of 6-month fixed rates), and places customers returning from competitive supply onto monthly variable rates, but does not identify which default rate individual customers take service under.
3 - All 3 IOUs have a field for NEM in their EDI 867HU reports, though a number of NEM customers with Eversource and Unitil were not initially indicated as such in their EDI (nor Puc 2204.03 reports). NHEC identifies NEM customers by NEM tariff rate classes.

Implementation Subgroup: Settlements

To confirm and keep updated



CPCNH's understanding as of 2/6/24	Eversource	Liberty	Unitil	NHEC
ISO-NE WHOLESALE SETTLEMENT SERVICE				
Interval hourly data (large C&I)	Yes	Yes	Yes	Yes
Interval hourly data (mass market)	N/A	N/A	N/A	No
Interval hourly data (large NEM)	Partial ⁴	Partial ⁴	Partial ⁴	Partial ⁴
Interval hourly data (small NEM)	N/A	No	No	No
Interval hourly data (TOU)	N/A	No	No	No
NEM profiles	No	No	No	No
2-part TOU profiles	No	No	No	No
3-part TOU profiles	N/A	No	No	N/A

Table Footnotes

4 - Utilities treat negative interval data as zero for load settlement.

Implementation Subgroup: Billing

To confirm and keep updated



CPCNH's understanding as of 2/6/24	Eversource	Liberty	Unitil	NHEC
UTILITY CONSOLIDATED BILLING SERVICE				
Monthly Rate Proration	No ⁵	Yes ⁵	No ⁵	No ⁵
Index rates (hourly market + RPS adder)	No ⁶	No ⁶	No	No
2-part TOU supply rates	No ⁶	No	No	No
3-part TOU supply rates	No ⁶	No	No	No
NEM 1.0 (kWh supply credits)	Partial ⁷	Partial ⁷	Partial ⁷	Partial ⁷
NEM 2.0 (\$\$\$ supply credits)	No	No	Partial ⁸	No
Group NEM Participant	Yes	Yes	Yes	Yes
Group NEM Host	No	No	No	No
Transactive Energy Rates	No ⁶	No ⁶	No ⁶	No

Table Footnotes

5 - Proration refers to applying calendar month rates to usage within individual customer billing cycles (which may span two calendar months). Eversource indicated to the PUC it is capable of prorating bills for customers in their C2 billing system upon CPA request; however, Eversource subsequently refused CPCNH's request to do so for the upcoming February-July 2024 rate cycle.

6 - Indicates a service that isn't provided to utility default service customers either.

7 - NEM 1.0 kWh credits rollover and offset supply charges each month, but no mechanism to cashout / compensate customer for excess supply on an annual basis.

8 - Unitil appears to have enabled consolidated billing for NEM 2.0 customers in Oct 2023, and is crediting CPA customers for excess generation at the CPA's supply rate — even though the CPA does not offer an approved NEM credit rate, and without the CPA's knowledge. It is unclear if Unitil is capable of accepting CPA NEM rates.

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Reference Documents

[1998 NH EBT Standards](#)

[Order No. 26,903](#)

[CPCNH NH EBT Working Group Recommendations](#)

NH EBT Working Group website (DOE)