



# The Senate of the State of New Hampshire

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Jared S. Chicoine  
Commissioner, Department of Energy  
21 S. Fruit St., Suite 10 Concord, N.H. 03301-2429  
Jared.S.Chicoine@energy.nh.gov

**RE: Department of Energy IP 2022-XXX Investigative Proceedings Relative to Customer-Generator Interconnection SB262**

Dear Commissioner Chicoine:

New Hampshire has been clear and consistent in stating that it has its own energy policy and does not want the policies of other states imposed upon New Hampshire. There are limited opportunities for New Hampshire to exercise its sovereignty due to federal policies and the structure of energy and electricity markets. The passage of Senate Bill 262 ("SB262") in 2022 is a demonstration of New Hampshire acting where it has the ability to set policies - the interconnection of Distributed Energy Resources ("DERs") on the distribution system.

We appreciate the Department of Energy ("DOE") commencing proceedings in its investigation of interconnection policies, as prescribed in SB262, per the Department's December 5th, 2022 Order of Notice. As sponsors of SB262, we look forward to the timely results of the proceeding.

However, it has come to our attention that Eversource has stated in its most recent Least Cost Integrated Resource Plan, filed in NH Public Utilities Commission ("PUC") Docket No. DE 20-161, that it has changed its interconnection standards in New Hampshire, specifically the application of the N-1 standard to certain DERs. Changes to the interconnection standards and to the procedures for DERs connecting to the distribution systems in New Hampshire must be reviewed and approved by the PUC to ensure consistency with New Hampshire's energy policies. The change referenced in DE20-161 did not go through such and approval process.

The clear intent of SB262 is to review the existing interconnection procedures, specifically including engineering standards, and make recommendations to the standing committees of the House of Representatives and Senate with jurisdiction over energy and utility matters. Eversource cannot change its interconnection standards for DERs on its New Hampshire distribution system without the review and approval of New Hampshire, and Eversource's change to the use of an N-1 standard on its distribution system has not been reviewed or approved.

We believe the interconnection changes referenced in DE20-161 did not undergo the required review or approval process and therefore should not be included in the Least Cost Integrated Resource Plan. The appropriate venue for the review of these standards was established by SB262, and fortunately, the DOE's investigation of interconnection procedures and standards has commenced.

Respectfully,

Handwritten signature of Kevin Avard in black ink.

Sen. Kevin Avard  
Chairman, Senate Energy and Natural Resources

Handwritten signature of Senator David H. Watters in black ink.

Sen. David Watters  
Member, Senate Energy and Natural Resources

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