STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENERGY

IMPLEMENTATION OF SB 270 – LOW :
TO MODERATE INCOME COMMUNITY : JANUARY 9, 2023
SOLAR PROGRAM :

WRITTEN COMMENTS OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") hereby submits these written comments in response to the Straw Proposal for a Low to Moderate Income Community Solar Program established by New Hampshire Senate Bill 270 ("SB 270") issued by the New Hampshire Department of Energy ("DOE") on December 6, 2022.

I. BACKGROUND

On September 7, 2022 the DOE held a stakeholder session regarding the implementation of SB 270, "An Act Establishing a Low-Moderate Income (LMI) Community Solar Program." Following this stakeholder session, the DOE issued a straw proposal for the LMI Community Solar Program on September 30, 2022 and held a second stakeholder session on October 4, 2022. On December 6, 2022 the DOE released a revised straw proposal and held a third stakeholder session on December 22, 2022. On December 27, 2022 the DOE issued a request for interested stakeholders to file written comments on the revised straw proposal by January 6, 2023. Eversource provides the following written comments on the DOE's proposal.

II. COMMENTS

Group Member Management:

Eversource appreciates the DOE's efforts to minimize the effects of member churn on maintaining the programmatically required production to load ratios, thus reducing administrative burden on the EDCs. However, Eversource still has concerns regarding the requirement that if the percent allocation to the host exceeds 3.5% in a given month that a member change period would be triggered. Reallocating memberships more frequently than quarterly could result in members being removed from a project erroneously.

While the DOE has captured the primary reasons why a customer may be removed from the program in the group management section of the proposal, there are other customer scenarios that could impact the 3.5% rule. If members are temporarily inactive at the time of billing, due to a move or temporary shutoff, the customer credit will revert to the host account. The combination of permanent account closures and temporarily inactive customers could trigger the 3.5% rule and force an off-schedule member reallocation. This could result in members who are only temporarily inactive being removed from the program without significantly reducing the number of months in which excess credits revert to the host.

Eversource recommends that the DOE remove the 3.5% rule and establish an additional rule that customers who are not verified as permanent account closures but who are inactive for two consecutive billing cycles will be considered to have permanently terminated service with the company for the purposes of the program. These customers would be replaced during the next member change period. This will provide additional clarity for customer scenarios where it may be challenging to distinguish between a temporarily inactive customer and a permanently terminated customer.

Eversource also recommends that DOE replace the term 'opt-out' in the member management table with 'cancellation.' The term 'opt-out' is also used to describe a scenario in which a member is automatically enrolled in the program but chooses not to participate within the initial 'opt-out' window. These customers would be replaced immediately until the project is fully subscribed. The 'opt-out' scenario described in the customer management table refers to customers that are fully enrolled in the program but choose to terminate their participation at some later date. These customers would be replaced during a quarterly member change period. To distinguish between the two scenarios, Eversource recommends that the term 'opt-out' refer to customers who choose not to participate in the program prior to enrollment, while 'cancellation' refers to customers who choose to end their participation after enrollment.

Customer Enrollment:

Eversource recommends that the DOE implement a shorter period for customer opt-outs than currently proposed. It takes time for the Company to select members, send customers notice of their enrollment and then allow for the opt-out period. Shorter opt-out periods ensure the Company has time to complete this process in a timely manner, while long opt-out periods can delay the completion of member enrollment and make it more challenging to align customer enrollment with the in-service date of the project. There are also no financial risks to customers for being enrolled in the program but cancelling their participation later, as there are no fees or other penalties for terminating participation in the program once enrolled.

In the Connecticut Shared Clean Energy Facility program Eversource allows customer's three days to opt-out of participation. In the Massachusetts Eversource Community Solar Access Program we have proposed an opt-out period of 5 days. Eversource recommends the DOE implement a similar opt-out period in the New Hampshire LMI Community Solar Program.

Other Considerations:

While Eversource is not opposed to allowing the 6MW annual program capacity to be located in any electric distribution company's ("EDC") service territory, the DOE should consider the implications for cost recovery of allowing the total program capacity to be statewide. If all projects are in one service territory, then ratepayers of that EDC will be responsible for the entire program cost.

In addition, Eversource suggests that the DOE clarify in the program rules that all members must reside in the same EDC service territory as the community solar project.

Clarifications on Eversource's Interconnection Process:

At the December 22, 2022 public meeting the DOE asked for additional details on Eversource's interconnection process for large generators. Customers applying for interconnection with PV systems between 100kW – 1MW are required to complete a pre-application for interconnection. After the pre-application is received Eversource will review the application and provide the customer with a pre-application report. The pre-application report provides a preliminary insight into how the distributed energy resource ("DER") will impact the distribution system. For customers whose projects require additional study to be able to interconnect, Eversource will provide the customer with a study cost and execution agreement. The study cost is specific to each project and the execution agreement specifies how long the study will take to complete. If the customer moves forward with the interconnection study, once the study is complete Eversource will provide the customer with a high level cost estimate for the modifications needed to the distribution system to interconnect the project.

Eversource recommends that the DOE require bidders to have completed a pre-application as an eligibility requirement for responding to the DOE RFP. The DOE could also consider requiring a bidder's fee or development period security to discourage speculative bids in the program.