## DE 17-007



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Debra A. Howland Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

RE: Docket No. DE 17-XXX Public Service Company of New Hampshire d/b/a Eversource Energy Proposed Tariff Amendment Re: Interval Data Access Service

Dear Director Howland:

Consistent with RSA 378:3 and New Hampshire Code of Administrative Rules PART Puc 1605 relating to service or tariff changes other than a full rate case, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") herein proposes to amend the terms of its tariff relating to Interval Data Services as described in Section 2 of the Terms and Conditions for Energy Service Providers Original Page 33 of Eversource's tariff, NH PUC No. 9. Consistent with Puc 1605.02, enclosed with this cover letter and summary are annotated and clean tariff pages showing the proposed changes, and a supporting technical statement. Consistent with RSA 378:3, Eversource proposes that the changes become effective 30 days from the date of filing, unless otherwise ordered by the Commission.

Historically, Eversource has provided interconnection service to and purchased power from numerous small hydro-electric generators as "qualifying facilities" as that term is used in Eversource's tariff (Section 33 of the Terms and Conditions on Original Page 24). For purposes of calculating the payment for purchased power and for complying with the reporting obligations of the Independent System Operator – New England ("ISO-NE"), Eversource has used interval meters to collect data on the electrical production of these facilities. To allow those entities to verify the information used to calculate purchased power payments, Eversource has made the interval data it collects available to those generators.

Recently, many of those same entities have opted to become "customer-generators" by availing themselves of the "group net metering" program as provided for in RSA chapter 362-A and N.H. Code of Admin. Rules Chapter Puc 900. Qualifying for that program requires that a customer-generator be located "behind a retail meter." RSA 362-A:1-a, II-b, *see also* Puc 902.03. Accordingly, entities that have not previously had their electrical production occur behind a retail meter, now have such metering in place as a condition of participation in the group net metering program. In general, the retail load for these entities has put them in

Eversource's General Delivery Service Rate G customer class. Moreover, as part of the group net metering program these entities are now compensated for their electrical production based upon calculations that do not require interval meter data, and use fixed rates which are set by the Commission pursuant to its regulations in Chapter Puc 900.

Because the interval data is no longer relevant for determining the proper level of compensation for the customer-generators in the group net metering program, the need for these customer-generators to verify the interval data collected by Eversource has ceased and Eversource no longer has cause to provide the data to them. Nevertheless, Eversource continues to collect this data. Furthermore, in that many of the generators have historically received the information from Eversource, and many of them have yet to install other forms of production monitoring technology, they continue to request that it be made available to them. While Eversource is willing to make the data available, under Eversource's present tariff, "Interval Data Access Service," described on Page 33 of Eversource's tariff, is available only to retail customers in Eversource's Primary General Delivery Service Rate GV, Large General Delivery Service Rate LG, and Backup Delivery Service Rate B customer classes. In that these retail customer-generators are most often Rate G customers, they are not eligible for the service.

Accordingly, and as described in the attached documents, Eversource proposes to amend its tariff to remove the limiting language and make the interval data services available to additional customers, and, in particular, the customer-generators described above. Furthermore, Eversource also notes that language included in the current tariff section relating to the provision of metering equipment is proposed to be deleted. Under Eversource's existing tariff, the only classes of customers able to request interval data services are those in rate classes GV, LG and B, where interval metering is standard. By expanding the scope of customers eligible for interval data services to classes where interval metering is not standard, deletion of this language will ensure that any request for "non-standard" metering will be handled in accordance with the metering provision on Page 15 of Eversource's tariff. Lastly, and as noted in the attached technical statement, Eversource expects the incremental revenue effect to be minimal.

Thank you for your assistance with this matter. If you have any questions about this matter, please do not hesitate to contact me.

Very truly yours,

Matthew J. Fossum

Senior Counsel

Enclosures CC: Tom Frantz, Director, Electric Division, NH PUC