

Leighton, Adele

From: Donna Hanscom [dhanscom@ci.keene.nh.us]
Sent: Friday, April 29, 2011 3:36 PM
To: Rulescomments
Subject: Rules Comment: PUC 900 net metering rule

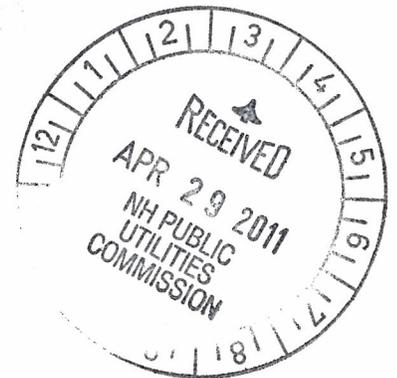
To the help the State of New Hampshire reach the goal of the 2007 NH Renewable Energy Act that 25 percent of the state’s energy should come from renewable sources, it is important to provide economic incentive for small power generators. The capital cost of the power generation equipment is high and needs to be offset as quickly as possible. To that end, the City of Keene offers these comments on the proposed rules that determine the value of the power produced by renewable sources.

1. The proposed rules do not clarify the effective date of the net metering power buy back requirement. The City of Keene requests that the PUC 900 rule include language to clarify that the effective date is the date RSA 362-A:9 became effective – August 13, 2010.
2. The value of the excess kw that are purchased by the utility should be maximized. During discussions in 2010 with the legislative committee, payback of 8 – 9 cents per kw was cited as a likely value. Discussion with PSNH indicated that the avoided cost is currently in the range of 4 – 4.5 cent per kw. The recent public hearing on this proposed rule generated discussion and a proposed revision by the utilities regarding the potential mechanism for determining the payback cost. The City requests that the PUC consider language that maximizes the benefit to the small generator to support the effort of renewable power generation in the state.

Thank you for your consideration.

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