

NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

NHPUC 17SEP15PM2:17

Re: IR 15-296

As you consider how New Hampshire should move forward on next steps regarding modernization of the electrical grid, there needs to be an emphasis on the available low-hanging fruit in the areas of efficiency and distributed power generation. At present, there are insufficient incentives to move enough electric customers to allow efficiency and distributed power to make the difference they can.

The current model of large regulated monopolies requires more mandates to move us in the right direction. For example, there is no time-of-day electricity pricing available to many customers. This means that peak demand is much higher than it could be with the incentive of lower off-peak prices. After installing solar photovoltaic, I was told by my supplier that the regulations meant that I could not also have off-peak pricing. I appealed that to the PUC after reading the relevant materials and was told that I was right that there is no such prohibition but I could still be denied off-peak metering by the utility since the installation of such meters was entirely at their discretion. Since the electric suppliers often seem to feel that they should always simply pursue higher sales of their higher priced electricity, the NH environment is the loser on this. With enough off-peak incentive, we can cut into those approximately forty days per year when demand is high enough to cause the use of expensive and/or highly polluting technologies. We can also reduce the perceived need for more infrastructure that is dependent on burning more fossil fuel and/or causing irreparable environmental damage.

Raising the current cap on distributed electric power generation will also greatly improve the situation going forward. Solar power is often very strong when there is a very large demand for air conditioning and it is also often quite good in winter when demand can also peak during the day. There is no reason to suspect that more of these renewable resources being added to the grid will cause it to have any instability so the only reason to keep the cap so low is for the profitability of the utilities. Other means of dealing with that should be found rather than having policies that are not helpful to electric ratepayers in New Hampshire. It needs to be remembered that every bit of power supplied to the grid during times of peak demand actually reduces everyone's costs since there is less need to find higher priced sources of electricity to meet the demand.

Along with reduced thermal energy use through better incentives to upgrade or switch heating systems and do more weatherization, we can have all the energy we need without massive new infrastructure projects. Such projects may depress the demand to move to cleaner sources like offshore wind and large solar installations by making them seem less competitive to those who might invest in them. The market power of large regulated monopolies should not be allowed to drive the future this way, especially since it is clear that the environmental costs of those projects are not being adequately accounted for in many cases (e.g. the pollution and damage involved in hydraulic fracturing for natural gas and the methane emissions and environmental destruction of large hydropower dams).

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