



October 5, 2015

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

Re: IR 15-296: Electric Distribution Utilities Investigation into Grid Modernization Order of Notice

Dear Ms. Howland:

The New England Clean Energy Council (NECEC) greatly appreciates this opportunity to provide an addendum to the comments we filed on September 17, 2015 in the New Hampshire Public Utilities Commission Docket IR 15-137, which opens a docket on grid modernization, pursuant to House Bill 614. (The initial comments are attached to this communication as background).

The Order of Notice states that, "Grid modernization includes the incorporation of "smart meters", however pursuant to RSA 374:62, no electric utility is allowed to install a smart meter device without the written consent of the customer." However, based on some research, this statement appears to be inconsistent with Order 25,409 where the NH PUC determined that advanced metering infrastructure (AMI) is not the same as a "Smart Meter Gateway Device" as defined in RSA 374:62, and allowed New Hampshire Electric Cooperative to deploy smart meters on an opt-out basis.

The statutory definition of a *smart meter gateway device* requires that the meter communicate with, monitor or control appliances, equipment or devices within the residence or business. It is our understanding that the basic, or standard, smart meters NHEC is in the process of installing throughout its service territory cannot communicate with devices behind the customer meter. Instead, these basic or standard smart meters measure only overall electricity usage at the customer's home or business. As a result, these new NHEC digital meters are not "smart meter gateway devices" as defined in RSA 374:62, and therefore, NHEC is not required to obtain an opt-in from its customers before installing these devices.

The key distinction is that a "Smart Meter Gateway Device" is able to communicate with devices behind the customer meter. Most conventional AMI does not do this. NECEC respectfully recommends that the PUC clarify that its investigation of grid modernization in New Hampshire will include consideration of AMI, distinct from smart meter gateway devices.

NECEC appreciates the opportunity to submit these comments and recommendations in this process. We hope that the New Hampshire Public Utilities Commission sees NECEC and our

member companies as resources as you move forward with this investigation. Please let us know if you have any questions about our comments or if we can be helpful in any way.

Thank you,

Sincerely,

A handwritten signature in black ink that reads "Janet Gail Besser".

Janet Gail Besser
VP, Policy and Government Affairs