

May 19, 2017

Debra A. Howland, Executive Director and Secretary
State of New Hampshire
Public Utilities Commission
21 South Fruit Street
Concord, N.H. 03301-2429

Re: Investigation into Grid Modernization, Docket IR 15-296

Dear Ms. Howland,

Thank you for the opportunity to provide written comments on the New Hampshire Grid Modernization Working Group Final Report, which was submitted by Jonathan Raab on March 20, 2017 as part of the Public Utility Commission (PUC) docket DE 15-296 "Investigation into Grid Modernization." I had the opportunity to participate in the Working Group as a member of the public and did my best to bring my experience as an electrical engineer to the discussions.

I have read and support the comments on the Final Report from the OCA, DES, and the combined comments from Arcadia-CLF-NHSEA-NECEC. These comments highlight the critical need for further investigation into how DER should be integrated into Grid Modernization planning. As an engineer, I especially appreciate the OCA's point 6, which encourages adoption of NIST standards in developing a framework for implementation and the utility business case, "The next phase of the Commission's consideration of grid modernizations issues provide a suitable opportunity to revisit the question of whether the Commission should direct the utilities to rely on the NIST framework. There are sound reasons for doing so since the NIST framework provides a set of rigorous engineering standards that can serve to constrain and guide the utilities. The lack of such an objective and rigorous framework risks allowing the utilities to rely on potentially self-serving engineering judgements that would be difficult to scrutinize for prudence or otherwise."

As an example of how standardization impacts consumers, please refer to Chapter 5.3 of the Final Report, "Customer Education." In the "Customer Engagement Platforms" sub section, the Final Report mentions the Eversource Customer Engagement Platform that was developed in part with funding from statewide ratepayers, "The Working Group acknowledges that Eversource has recently developed a promising platform, and recommends that the other utilities also develop a customer engagement platform."

On this subject the Non-Utility and Utility Stakeholders take very different positions, "**Non-Utility Stakeholders**: A statewide platform should be developed for the following reasons: lower cost, risk mitigation, consistent energy efficiency policy, and a uniform customer

engagement experience for all New Hampshire energy customers. Any statewide platform should be able to be tailored to each utility's customer and service offerings.

Utilities: All three utilities operate in multiple jurisdictions, and offer multiple services (i.e., gas, water, electric). Therefore, the utilities prefer to preserve the ability to develop customer engagement platforms tailored to their own customers and service offerings."

I believe the difference in these positions can be accounted for by the fact that the utilities have little incentive to cooperate on a project that would leverage the investment ratepayers have already made in the Eversource Customer Engagement platform. Since the utilities can recover all of their costs, even if they "start from scratch," they are not motivated to consider the benefit to customers by taking a more collaborative approach and building on the work already done by Eversource.

In summary, I urge the Commission to consider adoption of the NIST Framework and other best practices from states, like New York, who are further along in Grid Modernization implementation.

Thank you again for allowing me to participate as a member of the Working Group and for considering my comments on the Final Report.

Sincerely,

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