



May 19, 2017

Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit St.
Concord, N.H. 03301

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

Dear Ms. Debra A. Howland,

Thank you for the opportunity to file comments on the Grid Modernization Working Group Report. I appreciate this opportunity to introduce myself and to share my thoughts with you after observing and participating in PUC proceedings for the better part of the past two years. I hope that I, as a young and aspiring energy enthusiast, can provide you with a fresh and unique perspective of the policy challenges facing our Commission and Commissions across the country today.

Since summer 2015 I have observed the EERS proceeding, I have engaged actively as a member of the Grid Modernization Working Group, and I have intervened most attentively in the Net Metering Docket. My role in these dockets has been two-fold. I intervene on behalf of Revolution Energy, LLC, a Distributed Energy Resource (DER) provider, and the dockets are also the subject of my research as a graduate student at the University of New Hampshire.

Over the course of these experiences, two observations are worth noting explicitly:

1. Growing DER markets are disrupting the conventional utility sector;
2. This disruption is a source of conflict between incumbent electric utilities and the nascent DER coalition.

It is also apparent that, whether by design, accident, or fortune, the weighty task of reconciling that conflict and designing a framework to facilitate the integration of DERs into the electricity system has fallen to the Commission.

It appears to me that this new task of guiding DER-integration represents a dramatic departure from the traditional Cost of Service Regulation (COSR) function of the Commission. In fact, I invite you to consider the possibility that these two functions are mutually exclusive, that Cost of Service Regulation is inherently incompatible with DER-integration.

In addition to the incompatibility of COSR and DER-integration, the differences between these two functions make them suited for different regulatory approaches. The adjudicatory arena, while well suited for the COSR function, in which a small number of actors negotiate a narrow range of issues, raises challenges for decision-making regarding DER-integration. DER-integration involves numerous actors and a broad spectrum of complex and interlocking issues and is thus ill-suited for strict, adversarial adjudication.

In these three dockets addressing DER-integration, I have witnessed the Commission adapt its regulatory approach in an effort to foster dialogue, learning, and collaboration among the various stakeholders. From educational Technical Sessions in the development of the EERS, to the collaboratively facilitated Grid Mod Investigation, to the skillful management of thorny Net Metering Settlement Negotiations, the Commission has worked to shift focus away from the adversarial Hearing and towards creative, collective problem solving. I commend the Commission for these efforts and I encourage the Commission to go even further to realize its role as a facilitator of collaboration among the various stakeholders.

I see a number of opportunities for New Hampshire to continue to constructively pursue the alignment of utility, DER, and public interests through creative collaborations. Particularly, the Commission should consider linking next steps associated with Grid Mod and the Net Metering Docket as the two issues are inextricably linked. For example, the Commission should consider:

- 1. Integrating Net Metering pilot task force(s) with Grid Modernization rate design and DER planning; and**
- 2. Integrating Net Metering and Grid Modernization Customer and Utility Data Collection Efforts.**

Both Settlement Agreements in the Net Metering Docket recommend the Commission establish one or more Task Forces to address issues of data collection, pilot projects, and a Value of DER Study. Such Task Forces, if well constructed and facilitated, represent opportunities to foster relationship building, learning, and creative policy design that incorporates the diversity of interests and perspectives involved in DER-integration.

As the energy sector evolves, so too does the role of the Commission as it shifts its function from setting rates for monopoly utilities to facilitating policy design for a competitive DER marketplace. As this new function develops, so too must the regulatory approach. I applaud the Commission for the manner in which it has handled these early efforts to facilitate DER-integration and I encourage the Commission to continue to seek out ways it can convene stakeholders to undertake creative, collective problem solving.

Thank you again for the opportunity to share these comments.

Sincerely,



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