

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 19-057

Public Service Company of New Hampshire d/b/a Eversource Energy

TESTIMONY OF
MADELEINE MINEAU

On behalf of Clean Energy NH

December 20, 2019

STATE OF NEW HAMPSHIRE

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**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY**

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1 **Q. Please state your name, the organization you work for, your position and business**
2 **address.**

3 **A.** Madeleine Mineau. I am the Executive Director of Clean Energy NH (“CENH”), which
4 is located at 14 Dixon Avenue, Suite 202, Concord, NH 03301.

5

6 **Q. Please describe your qualifications.**

7 **A.** I am currently the Executive Director of CENH where, in addition to managing the
8 administration of the organization and supervising staff, I am the lead on regulatory and
9 policy issues. I have a BA in Biology and Environmental Policy and a PhD in Ecology. I
10 have been in my current position for 1.5 years and have prior experience working in
11 energy policy as co-president of Granite State Hydropower Association and as

1 Waterways Manager for the City of Nashua where I managed two hydropower generation
2 projects. My resume is included as Exhibit CENH-MM- 1.

3
4 **Q. Have you testified previously before the New Hampshire Public Utilities
5 Commission or other regulatory bodies?**

6 A. I have testified before the New Hampshire Public Utilities Commission (the
7 “Commission” or “PUC”) in Docket No. DE 17-136 2019 regarding an update to the
8 statewide energy efficiency plan and in Docket No. DE 17-189 where I adopted the
9 testimony of my predecessor, Kate Bashford Epsen. In addition, I participated in Docket
10 No. DE 16-576 on behalf of the City of Nashua and Granite State Hydropower
11 Association. I am currently representing CENH in several dockets including IR 15-296,
12 DE 17-136, DE 19-064, DE 19-104, DE 19-133, DRM 18-158, and the planning process
13 for the next EERS plan.

14
15 **Q. What is the purpose of your testimony?**

16 A. The purpose of my testimony is to provide CENH’s position with regard to Eversource’s
17 proposal for its Grid Transformation and Enablement Program (“GTEP”) and how the
18 cost of that program is recovered through a Distribution Rate Adjustment Mechanism
19 (“DRAM”). CENH is also jointly filing the testimony of Kevin Miller from ChargePoint
20 regarding electric vehicle charging stations and the rates that would be applicable to those
21 stations.

22

1 **Q. Please explain CENH's interest in the GTEP.**

2 A. As part of our work as advocates for clean energy, the efficient use of energy, and
3 accelerating the NH's transition to a clean energy economy, CENH recognizes the need
4 for investments to facilitate the integration of distributed energy resources in the
5 distribution system. However, Eversource's proposed GTEP would not address the most
6 imminent and important needs to achieve this end. Furthermore, there seems to be
7 considerable overlap between the scope of the proposed GTEP and the likely scope more
8 broadly undertaken in the statewide grid modernization efforts. New Hampshire's grid
9 modernization process is being addressed in Docket No. IR 15-296, which is currently
10 ongoing and encompasses several unresolved important issues that include how utilities
11 would be allowed to recover the costs of investments made associated with grid
12 modernization.

13

14 **Q. What are your concerns about Eversource's GTEP proposal?**

15 A. Although Eversource claims that all proposed GTEP investments aim to address the twin
16 goal of increased resilience and to facilitate the integration of advanced energy solutions,
17 as proposed the GTEP investments appear heavily weighted towards a focus on
18 bolstering system resilience. For example, accelerating pole replacement would provide
19 no tangible benefit to the integration of clean energy in the distribution system. This is
20 especially true following the removal from this docket of the Westmoreland Clean
21 Innovation Project and the Oyster River Clean Innovation Project and their associated

1 testimony. Eversource’s proposal now lacks specifics as it pertains to what types of
2 “advanced energy solutions” would be enabled by GTEP and how and when these
3 solutions would be achieved. The only detail is in regard to providing distribution system
4 resiliency; CENH acknowledges that system resilience is an important goal of a
5 distribution but there is nothing new about this goal such that the Commission should
6 view it in any unique way or provide special rate treatment.

7
8 **Q. Please provide more detail on your concerns.**

9 A. When asked in discovery to identify locations where distributed generation hosting
10 capacity is already constrained, Eversource first acknowledged that hosting capacity has
11 not been comprehensively evaluated within its system. A comprehensive hosting
12 capacity analysis would be necessary to identify priority locations where system upgrades
13 are needed to enable the integration of additional distributed energy resources. CENH has
14 been advocating that such an analysis be conducted and that the communication of the
15 results to stakeholders be a priority under grid modernization. Further, of the locations
16 identified by Eversource as already constrained, two of the substations are planned for
17 upgrades as part of its base capital program. It is unclear to me if proposed GTEP
18 investments would alleviate hosting constraints in part or not at all at the other six
19 locations identified. Eversource is already able to address some needed system upgrades
20 as part of its base capital program and without a better understanding of distributed

1 energy resources hosting constraints on the system, proposed GTEP investments may be
2 misdirected.

3

4 **Q. Do you have any concerns with timing?**

5 A. While New Hampshire currently has very low penetration of distributed generation, I
6 think it is very important to plan now and begin the work needed for the integration of
7 distributed energy resources. This work, however, can be best undertaken in the grid
8 modernization docket where a unified framework can be developed for all regulated
9 utilities in New Hampshire rather than in individual utility rate cases.

10

11 **Q. Please discuss your concerns with GTEP and how it relates to the Distribution Rate**
12 **Adjustment Mechanism.**

13 A. GTEP is proposing to accelerate distribution system upgrades that, if deemed necessary
14 and prudent, should be recovered through a regular distribution charge. Maintaining the
15 distribution system is the responsibility of the distribution utility and proper maintenance
16 includes upgrading equipment and infrastructure to current standards and good industry
17 practice. The proposal to create a new Distribution Recovery Adjustment Mechanism
18 seems unjustified to recover GTEP costs even if they were approved as necessary and
19 prudent. As proposed, the GTEP is either a distribution system cost that should be
20 recovered in the regular distribution charge or it is Eversource's attempt to get a head

1 start on grid modernization before the resolution of the grid modernization docket. The
2 issue of how utilities should be able to recover costs associated with grid modernization
3 investments is one of the unresolved issues in the grid modernization docket. Approving
4 the DRAM in this case, without the context of and perspectives in the grid modernization
5 docket, would lead to a poorly-considered decision in this docket, constrain the
6 Commission's decision-making in the grid modernization docket and possibly lead to
7 conflicting decisions.

8

9 **Q. Please summarize your concerns with the GTEP proposal.**

10 A. CENH's main concerns with the GTEP proposal are twofold. First, it does not contain
11 actual grid-transformational projects. Rather, the proposals are aimed at system
12 resiliency and reliability, very traditional and standard goals of a distribution utility.
13 These are not unique and should not be the subject of special rate recovery mechanism
14 like the DRAM. Second, to the degree there are any projects aimed at facilitating the
15 integration of advanced energy solutions, the planning, implementation and funding of
16 those projects should be addressed in Docket No. IR 15-296. To do otherwise would
17 undercut the hard work of the parties in that docket, especially when you consider that
18 Eversource is by far the largest utility in New Hampshire.

19

20 **Q. Does this conclude your testimony?**

1 A. Yes.

Exhibit List

CENH-MM-1

Resume of M. Mineau