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VIA ELECTRONIC MAIL ONLY Debra A. Howland Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

## Re: Public Service Company of New Hampshire d/b/a Eversource Energy Docket No. DE 19-104, Clean Innovation Community Solar Pilot Proposal - Project update and proposed modifications

Director Howland:

In August of 2020 the procedural schedule for this docket was suspended at the request of Commission Staff ("Staff"), which was supported or uncontested by all parties to the docket, in light of uncertainty associated with the impact of the COVID-19 pandemic. Staff's August 17, 2020 status report letter set out a "preliminary procedural schedule" that called for Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") to provide an update to its proposal by January 8. In line with that proposed schedule, Eversource is providing this letter.

During the time of the suspension, and in light of current economic conditions, Eversource has been considering certain modifications to the proposed pilot program intended to reduce costs for the implementation, administration and oversight, as well as to ensure consistency with changes to Puc 900 rules which took effect in September 2020. After several discussions with Staff, the Office of the Consumer Advocate, and Clean Energy New Hampshire, the major recommended modifications to the approach to the pilot program are outlined below.

At this time Eversource recommends that a Request for Information ("RFI") issued by the Company would be a productive approach to exploring opportunities for the further support of Low to Moderate Income ("LMI") Community Solar Facilities. While Eversource maintains a strong desire to support and develop the LMI marketplace, there may be market barriers that exist of which Eversource is currently unaware. An RFI would allow respondents identify such barriers and allow Eversource to better design potential solutions that may overcome these challenges. An RFI also creates an opportunity to reach out to the community of stakeholders familiar with this market segment to gain insight from and perhaps even partner with, in the hopes to create efficiencies in project implementation and administration.

Eversource also intends to propose modifications to the program that would substantially reduce cost. The Company anticipates it may be reasonable to limit the scale of a pilot to a level at which automation to existing back-end systems is not necessary for program administration, but rather can be done manually with existing company resources. Such a reduction in scale would curtail the need for costly near-term system modification while still preserving

opportunities to gain insights on potential models for LMI Community Solar projects. Eversource also believes that this pilot may be well-suited for certain uses that have been discussed for a portion of the Clean Energy Fund arising from Eversource's generation divestiture. Should the stakeholder process for the Clean Energy Fund allow for this pilot to make use of those funds, Eversource expects it could address a considerable portion of program costs that may remain. When taken in combination with the other cost-minimizing modifications being proposed, ideally there would be no funds necessary to be recovered from customers.

Given the effects that these two recommended changes would have to the pilot structure and approach, a fully updated proposal will take additional time, and certain aspects would benefit from further stakeholder input as well as the RFI responses themselves. Accordingly, Eversource proposes the following approach and next steps for this docket. On or by January 19, Eversource will provide to the parties to the docket a sample RFI and certain updates to the existing proposal such as information on compliance with the newly modified Puc 900 rules, and any impacted discovery for which revised answers are possible given the current information available. This will give all parties some time in advance of the proposed January 29 technical session to review Eversource's approach and develop input and feedback on how to proceed with issuing the RFI and next steps once responses to the RFI are received. Eversource also suggests that further dates for the procedural schedule be discussed at the January 29 technical session, as the parties in attendance will be able to best assess how to proceed with this docket once the materials provided on January 19 are discussed.

Thank you for your consideration in this matter, and please contact me with any questions.

Regards Jessica A. Chiavara

Counsel, Eversource Energy