



November 8, 2019

Debra A. Howland  
Executive Director and Secretary  
N.H. Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, N.H. 03301

**RE: DRM 19-158: N.H. Code of Admin. Rules Ch. Puc 900  
Net Metering for Customer-Owned Renewable Energy Generation Resources  
of 1,000 Kilowatts or Less**

**Comments of Unitil Energy Systems, Inc.**

Dear Ms. Howland:

In connection with the above-referenced matter I enclose the Comments of Unitil Energy Systems, Inc. Please do not hesitate to contact me should you have any questions regarding the Company's comments.

Regards,

A handwritten signature in black ink, appearing to read "Patrick H. Taylor", with a long horizontal flourish extending to the right.

Patrick H. Taylor

Cc: Service List (by e-mail)

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Patrick Taylor  
Senior Counsel  
taylorp@unitil.com

6 Liberty Lane West  
Hampton, NH 03842

**New Hampshire Code of Administrative Rules Chapter Puc 900 Net Metering for Customer-Owned Renewable Energy Generation Resources of 1,000 Kilowatts or Less**

**Comments of Until Energy Systems, Inc.**

In connection with the above-referenced matter, Until Energy Systems, Inc. (“Until”) now reiterates comments first offered at the October 31<sup>st</sup> technical session regarding two specific issues of concern:

- 1) The new draft rules for 909.13(c) state: “The group host of a low-moderate income community solar project shall have the option to receive payments from the electric distribution utility on a monthly basis equal to the total on-bill monetary credit amount in excess of billed charges carried forward for more than 30 days.” Until recommends that the “carried forward for more than 30 days” section be removed from the draft rule. The requirement to monitor the account for 30 days and then issue the payment would be administratively burdensome and would require a billing analyst to keep track of the accounts throughout the month rather than issuing the payment immediately when it is earned. The Company sees no need to wait 30 days, and believes that immediate payment would likely be the method preferred by the Group Host.
  
- 2) The draft rules carve out new filing requirements for Group Hosts that request to receive the LMI adder and, as such, require on-bill crediting. The Group Host will be required to file credit allocation percentages for both the base net metering credit monetary amount otherwise payable to the host as well as the LMI adder portion. This allows the NHPUC to determine if the Group Host is allocating at least 50 percent of the LMI adder to its LMI members, as required by the rules. Group hosts use assumptions of pricing for the base piece when they calculate their percentage allocations required here. For example, the majority of these projects would most likely be large customer generators which receive the default service rate as their compensation for the net surplus kWh. Until recommends that a third percentage be calculated by the Group Hosts in their registration form that provides for a “blended” allocation percentage based on the base and LMI adder allocation percentages combined with their corresponding compensation rates. By doing this, the utility would only need to provide for one credit allocation to each Group Member instead of two. The rules do not require the distribution utility to do any reporting on the credit allocations to group members by base and LMI component, so there is no need for the utility to separate the allocation into the two components. The result would be much simpler, less costly to implement, and easier for Group Members and Group Hosts to understand. Until recommends that the blended credit allocation be used by the utility for providing one credit per month to Group Hosts and Members, rather than two separate credits. A simple example of how the host could calculate this blended credit allocation percentage follows using an assumed \$0.08500/kWh default service rate and the \$0.03000/kWh LMI adder.

	Allocation	Allocation	Blended
	Base	LMI Adder	Total
Rate:	\$0.08500	\$0.03000	\$0.11500
Host	50%	50%	50.00%
Member 1	25%	0%	18.48%
Member 2	25%	0%	18.48%
LMI Member 1	0%	10%	2.61%
LMI Member 2	0%	10%	2.61%
LMI Member 3	0%	10%	2.61%
LMI Member 4	0%	10%	2.61%
LMI Member 5	0%	10%	2.61%