

**STATE OF NEW HAMPSHIRE**

**BEFORE THE**

**PUBLIC UTILITIES COMMISSION**

**ELECTRIC AND NATURAL GAS UTILITIES**

Development of a Statewide, Multi-Use Online Energy Data Platform

Docket No. DE 19-197

Petition of Kat McGhee for Intervention

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission on December 13 in the above-captioned proceeding, N.H. Code Admin. Rules PUC 203.17, and RSA 541-A:32, Representative Kat McGhee hereby petitions for leave to intervene in this matter. In support of its petition, Kat McGhee states as follows:

Rule PUC 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32. RSA 541-A:32, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon a showing that the petitioner has "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."

According to the Order of Notice, this docket concerns the development, implementation, and maintenance of a statewide, multi-use online energy data platform in accordance with RSA 378:50 through :54 (as enacted earlier this year as 2019 N.H. Laws Ch. 286, and as proposed by SB 284); issues relating to privacy policies for customer data in accordance with RSA 363:37

and :38; issues relating to the availability and transmittal of aggregated community-level energy usage data pursuant to RSA 53-E:4; and the question of whether the cost of the platform to be recovered from customers is reasonable and in the public interest (or, alternatively, whether implementation of the platform should be deferred). For the reasons that follow, these determinations may impact the rights, duties, privileges, immunities, or other substantial interests of Representative Kat McGhee's constituents in Hillsborough County and the State of New Hampshire.

I am seeking intervenor status as Kat McGhee, P.O. Box 1602, Hollis, NH; I am an Ever-source customer and I represent utility customers in Hollis, Milford, Mont Vernon and New Boston. But my primary purpose in intervening is to supply special knowledge of the proposed collaborative venture and my duty to provide that information to the commission.

I chaired the House Committee on SB284 in cooperation with the Office of Consumer Advocate and helped collaborate with the NH utilities to bring about passage of the bill. In that process, my background as a Technology Program Manager helped with communication and understanding of the work that had already been completed on the road toward requirements gathering and the development of a logical data-model standard for the statewide, online energy platform. This docket differs from other PUC dockets in that it requires not only a state and utility collaboration, but also the integration and management of a software project for which the state must supply some measure of technical expertise and oversight to achieve its goals.

The logical data-model standard, which could also be referred to as the New Hampshire Energy Data Standard, was conceived and designed by state resources to facilitate the collaboration with the state's utilities. The problem of state ownership has been and remains a potential

point of failure for this project because there is no natural state agency or department home for the technical project management to live within the State of New Hampshire's bureaucracy.

Without specific and dedicated ownership for the technical aspects of the project on the state side, it is highly unlikely the project will meet its intended objectives in a timely and cost effective manner. The OCA does not manage software projects, although the technical expertise that lead to the development of the New Hampshire Energy Data Standard originated in the OCA. There is no NH Department of Energy. This is a strategic project, a one-off, if you will; so it is not really the right fit for DoIT. The limited nature of technical expertise to oversee and collaborate with the utilities on the upcoming phases of the project has also presented a real impediment to the state being able to continue to define next steps for which state input is essential. So docket 19-197 is further complicated by the fact that the person with the most in-depth technical knowledge of how to move the software collaboration forward is not in a position to lead the project. This is another potential point of failure.

In a 2019 strategy meeting of the ISO-NE, panelists and keynote speakers alike spoke about the elusive nature of a tool that could help users, utilities and governments track distributed energy resources (DER) at the state level. They identified this standard as the single most nagging impediment to advancing the deregulated utilities market because without such a tool, DER growth is hard to measure and nearly impossible to manage. Municipalities, small electric generators, coops and energy committees across the state and the US are all clamoring for a tool to take renewable energy into the next phase of its integration with our traditional energy landscape. Dockets like Grid Modernization are crying out for the ability to quantify the DER with greater ease. The New Hampshire Energy Data Standard identifies the way forward with a standard that

helps NH leap-frog to a workable prototype quickly, so that the utilities can make rapid progress in refining how the ultimate platform will work. If we ask them to create a standard from scratch, two years worth of work will be lost and the costs of the project will be unnecessarily increased.

If putting together the requirements for this tool was easy, our international keynote at the ISO-NE would not have been highlighting the fact that no viable energy data standard is yet available. So it is important that we understand that we have a valuable and viable way forward with The New Hampshire Energy Data Standard developed by the OCA. This research and definitional framework provides the technical launch-pad to streamline the development of a statewide, online energy platform, saving ratepayers unnecessary expense and saving utility collaborators on this project costly trial and error. The next phase of the software project is to use the state's logical data model to set up a sandbox for review, testing and refinement. Ultimately, the results of this phase will lead to stronger requirements and a clearer consensus on what the statewide, online energy platform will be, when it comes time to build it for statewide use.

The Consumer Advocate requested that I seek intervenor's status to ensure that the Public Utilities Commission understood the potential points of failure in the technical collaboration that can be addressed in order to bring about the significant advantages of a successful docket/project for the state and its ratepayers.

WHEREFORE, Representative Kat McGhee respectfully requests that this honorable Commission:

- A. Grant the petition for intervention, and
- B. Provide any other such relief as it deems appropriate.

Sincerely,

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Kat McGhee  
NH State Representative  
Science, Technology & Energy Committee  
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Certificate of Service

I hereby certify that a copy of this Petition for intervention was provided via electronic mail to the individuals included on the Commission's service list for this docket.

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