



CITY MANAGER'S OFFICE

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July 1, 2022

Daniel C Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301-2429

Re: Request for Approval of Amended Lebanon Community Power Electric Aggregation Plan

Dear Chairman Goldner,

Attached please find the Lebanon Community Power Electric Aggregation Plan, as amended by a unanimous vote of the Lebanon City Council on June 15, 2022, for review and approval by the Commission pursuant to RSA 53-E:7, II. The Plan was amended to address the concerns of the Commission as expressed in your Order # 26,571, Memorandum of Decision, of January 26, 2022, in DE 21-143.

Attachment 9, How Load Serving Entity Services will be Implemented, at page XXXI, and referenced on p. 21, addresses the Commission request for “more detail describing the structure of the LSE and how the LSE services will be implemented.” (Order at p. 5)

Attachment 10, Customer Data Protection Plan, at page XXXVII, referenced on p. 23, addresses the Commission’s request for “additional detail on the scope and nature of the customer data that will be in the possession, custody, and control of Lebanon or its suppliers and vendors, and the protective measures that will be utilized to protect that data from unauthorized access, use, destruction, modification, or disclosure.” (Order at p. 3)

A number of additional updates and minor revisions are sprinkled throughout the main body of the plan. A PDF with the adopted amendments compared with the original City Council approved plan, as reviewed in DE 21-143 is attached to help facilitate review of the revised plan. This comparison is shown in track changes except for the bodies of entirely new Attachments 9 and 10, which are shown in regular text.

The City looks forward to the Commission’s adoption of final proposed rules in DRM 21-142 on July 5. While the City anticipates that its revised EAP will be entirely consonant with Commission’s final rule proposal, if that is not the case we will promptly withdraw the plan to consider further amendment.

Copies of this plan are being provided contemporaneously to the Office of the Consumer Advocate, the NH Department of Energy, and Liberty Utilities, which is the only electric distribution utility serving the City of Lebanon, should they wish to comment on the revised plan in light of the Commission's final rule proposal in DRM 21-142.

Pursuant to current Commission policy, this filing is being made electronically only.

Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,

DocuSigned by:



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Shaun Mulholland

City Manager

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