

From: Paul W Panish

Sent: Tuesday, August 20, 2024 1:54 PM

To: PUC: Clerks Office <ClerksOffice@puc.nh.gov>

Subject: Support for the Agreements on Net Metering Tariff and Recommendations for Extension

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Paul W Panish

Chair, Barrington Energy Committee

Barrington, NH

Public Utilities Commission

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Commissioners,

I'm the Chair of the Barrington Energy Committee, and I'm writing to express my general support for the agreements submitted on Net Metering Tariff Dockets. I agree with the suggestions submitted by the Settling Parties in Docket No. DE 22-060, however I believe that some of the recommendations from CPCNH are also essential to take into account.

This agreement from the settling parties in Docket DE 22-060 represents a balanced approach to maintaining the current net metering tariff structure while addressing the needs and concerns of various stakeholders, including Eversource, Clean Energy New Hampshire, Conservation Law Foundation, and others.

However, this settlement agreement needs to allow accounting for exports to the grid from customer generators, and this should be done through reductions to the wholesale load obligation as proposed by CPCNH. There are a number of residents in our community who have installed rooftop solar systems who should be able to purchase power from our Community Power Aggregation, but under the current system will not be properly compensated for excess generation if they switch from Eversource as their provider. There have been many studies done on the arguments against this (cost shifting being the main issue), and these have been thoroughly and effectively debunked.

The Settlement Agreement ensures that the existing net metering tariff structure remains in place, providing stability and predictability for customer-generators. The inclusion of a 20-year Legacy Period for projects newly enrolled in net metering under NEM 2.1 is particularly commendable, as it offers long-term certainty for investments in distributed generation.

In addition to supporting the Settlement Agreement, the following items speak strongly in favor of enhancing the Settlement Agreement in accordance with the Community Power Coalition of New Hampshire (CPCNH) position statement:

- Accounting for Exports to the Grid: Ensuring that exports to the grid by customer-generators are accounted for as reductions to the wholesale load obligation, thereby recognizing the value of distributed generation in reducing overall system costs.
- Compensation for Avoided Costs: Providing compensation for avoided transmission and capacity costs for customer-generators greater than 1 MW, which reflects the true value of distributed generation to the grid.
- NEM 3.0 for up to 100 kW: Continuing the basic structure of NEM 2.0 for projects up to 100 kW, with a different credit rate for energy supply, to support small-scale distributed generation.
- Energy Storage: Enabling energy storage to be interconnected in NEM 3.0, which will maximize the net benefits of net metering and enhance grid reliability.
- Considering the feasibility of enabling TOU rates for net metering and not limiting the generating capacity eligible for NM 3.0 tariffs.

By incorporating these recommendations, the Commission can further enhance the effectiveness and fairness of the net metering tariff structure, ensuring that it continues to support the growth of distributed generation while addressing the needs of all stakeholders.

Thank you for your consideration of these comments. I urge the Commission to approve the Settlement Agreement and to consider the CPCNH's recommendations for extending and enhancing the agreement.

Sincerely,

Paul W Panish

Chair, Barrington Energy Committee

