From: Jonathan Chaffee
Sent: Monday, November 27, 2023 3:38 PM
To: PUC: Clerks Office <clerksoffice@puc.nh.gov>
Subject: DE 22-060

Re: DE 22-060, Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation of Customer-Generators

To the Clerks of the PUC:

If the Commission is considering the scenarios for compensation of customer generators proposed in the Value of Distributed Generation Resources Study, I would argue for the NEM Tariff scenario which I believe is endorsed by all major utilities, rather than the ACV Tariff scenario. Besides my selfish motives (I intend to be a customer-generator) I consider two things about the ACV Tariff:

1. on page 65 "under the ACV Tariff scenario, net exports are compensated based on the value of the avoided costs calculated in this study (excluding environmental externalities)"

2. on page 65 "It is important to note that the analysis does not consider any impacts that the transition to an ACV
Tariff compensation model may have on DG economics and deployment trends in New Hampshire (i.e., the same level of future DG deployment is assumed under both scenarios)."

REDUCING THE TARIFF UNDER ACV TARIFF WILL DISCOURAGE DEVELOPMENT OF DERS.

The study states that Energy is the largest avoided cost stack valued, but the graphs show that for every type of distributed generation considered Environmental Externalities are the largest avoided cost value. I argue that we should have, and critically need goals relative to reduction in environmental impact and that taking these into consideration makes DERs much more valuable. I think it makes common sense that reduction in compensation as called for under the ACV Tariff Scenario will lead to less investment in new DERs, and the loss of a valuable environmental resource.

Thank you for considering my opinion.

Sincerely yours,

Jonathan Chaffee