

**From:** Carol Sullivan

**Sent:** Monday, November 27, 2023 1:34 PM

**To:** PUC: Clerks Office <clerksoffice@puc.nh.gov>; PUC: <puc@puc.nh.gov>

**Subject:** Re: DE 22-060

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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:

I write to urge the PUC to continue the state's current system for compensating customers who share surplus solar power on the grid. The three investor-owned utilities accept 75% as fair compensation and a fair balance among the interests of Customer-Generators, the utility companies, and NH residents who do not have net-metered energy devices.

**DOWN-SHIFTING:** The VDER Study acknowledged that, for residents without net-metered devices, "Monthly bills would increase by a small percentage for non-DG customers (1% to 1.5% for residential)."

**REDUCE TOTAL DEMAND:** But on the positive side, the VDER Study found that Customer-Generated net-metering (DG systems) "can generate energy and thereby decrease utility load, reducing the total demand that must be met by New Hampshire's utilities – and the ISO New England (ISO-NE) wholesale markets. This can reduce utility costs, generating avoided cost values."

**ADDITIONAL SAVINGS:** There would be diminished need for transmission lines, poles, and peaker plants. These are important considerations. As more NH customers are turning to electric vehicles and electric heating systems, there is expected to be a greater need for expensive new transmission lines and poles and peaker plants to meet capacity. Customers who net-meter greatly relieve the utility companies of the pressure of these added expenses.

**BETTER TRANSMISSION EFFICIENCY:** Electricity used at the property where it is generated does not suffer transmission loss. Electricity that must travel through transmission lines, from where it is generated to where it is used, does lose power along the way.

**SUPPORT FOR LOCAL ECONOMY:** Energy purchased from our legacy utilities is generated out-of-state, so the money NH residents use to pay their energy bills is sent out of New Hampshire. Solar panels are installed by businesses located in NH – they create jobs and keep money in the state. Money saved by those who net-meter is money that can be spent in the state, also adding to our economy.

**REDUCED MEDICAL COSTS:** Energy produced by rooftop solar does not create particulate matter (which is created when fossil fuels are burnt). Here is information from the NH Department of Environmental Services on the health and cost impacts of breathing particulate matter (PM 2.5, or 2.5 microns in width):

# NH Public Health Impacts

*Est. Annual Health Incidents from Air Pollution, 2013-15*

<b>Public Health Impact</b>	<b>PM<sub>2.5</sub></b>	<b>Ozone</b>
Premature Deaths	1,296	16
Emergency Room Visits	221	28
Lost Work Days	67,175	N/A
Acute Respiratory Symptoms	518,676	62,611
Total Valuation (2010\$)	\$3.7 Billion	\$132 Million

*NH Department of Environmental Services, 2017*

STABILITY: Continuity of net-metering rates will create stability for NH businesses, by supporting local contractors, helping bring down the cost of solar for all users, and keeping our workforce healthy.

The economic advantages of a stable net-metering system outweigh the disadvantage of minimal downshifting. Our three investor-owned utilities jointly gave their support to continuing the current system. Eversource spokesperson William Hinkle testified in favor of the economics of the system: “New Hampshire’s net metering policy—which is among the most balanced in New England—has been effective in encouraging the growth of [solar]resources in our state, and there is no evidence that the current compensation level is creating unjust cost shifts.”

Thank you for your consideration,

Carol Sullivan