

STATE OF NEW HAMPSHIRE

COMMISSIONER
Jared S. Chicoine

DEPUTY COMMISSIONER
Christopher J. Ellms, Jr.



TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-3670

Website:
www.energy.nh.gov

DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

August 1, 2024

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

Re: DE 22-060 Electric Distribution Utilities Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation of Customer-Generators; Department of Energy Position Statement

Dear Chairman Goldner:

On July 12, 2024, the Commission issued a procedural order in the above-captioned docket requesting that the parties submit a position statement on or before August 1, 2024, regarding what actions they will recommend the Commission take at the August 20, 2024, and August 22, 2024, hearing, and information about what exhibits and witnesses they intend to present at hearing.

The Department's responses to the Commission's requests are as follows.

1. What action or actions the Department recommends the Commission take at hearing.

Consistent with its testimony filed on December 6, 2023, in the above-captioned matter, the Department intends to recommend that the Commission largely maintain the "status quo" – that is, keep the current alternative net metering compensation tariff structure in place. A further description of the Department's intended hearing testimony is below.

2. What exhibits and witnesses the Department intends to present to support each recommendation, including a brief description of what its witnesses will testify to.

At present, the Department intends to submit the Direct Testimony of Elizabeth R. Nixon, Mark P. Toscano, and Deandra M. Perruccio filed December 6, 2023, as an exhibit. The Department intends to present Ms. Nixon, Mr. Toscano, and Ms. Perruccio as witnesses. The witnesses intend to testify consistent with the Department's position of maintaining the current alternative net metering compensation rate, as presented in the pre-filed testimony from December 6, 2023, while potentially commenting on any related observations developed since the time the Department's testimony was filed. The

Department's witnesses also intend to testify, consistent with the December 2023 testimony, that customer-generators be placed on an appropriate time-of-use ("TOU") rate, if available – if unavailable, then stakeholders and utilities should work to develop an appropriate TOU rate. The Department also intends to recommend that standardized application fees be addressed, as stated in testimony.

Consistent with the Commission's current practices, this letter is being filed only in electronic form.

Sincerely,

/s/ Alexandra K. Ladwig

Alexandra K. Ladwig
Staff Attorney/Hearings Examiner
Department of Energy

Cc: Docket Service List

ClerksOffice@puc.nh.gov
Adam.Yusuf@Libertyutilities.com
aglaserschoff@synapse-energy.com
alesko@preti.com
alex.hill@dunsky.com
alexandra.k.ladwig@energy.nh.gov
alexmarquez146@gmail.com
Alyssa.Maston@libertyutilities.com
amanda.o.noonan@energy.nh.gov
andrew.belden@eversource.com
anirudh.kshemendranath@dunsky.com
anthony.strabone@libertyutilities.com
ariel.crowley@navigant.com
austin.perea@arcadia.com
b.hayden@standardpower.com
bargetsinger@keyesfox.com
belder@eq-research.com
bhavumaki@synapse-energy.com
bking31415@gmail.com
brian.callnan@communitypowernh.gov
brian.rice@eversource.com
bross@consumerenergyalliance.org
Business.Agent@ibew490.org
carroll@unitil.com
cgordon@revisionenergy.com
chris@cleanenergy.nh.org
Christopher.aslin@doj.nh.gov
clane@synapse-energy.com
clayaz23@gmail.com
Clifton.Below@CommunityPowerNH.gov
clyde.carson@gmail.com
david.j.shulock@energy.nh.gov
david@clearpath.energy
dclapp@revisionenergy.com
Deana.Dennis@CommunityPowerNH.gov
deandra.m.perruccio@energy.nh.gov
debski@unitil.com
denise@colonialpowergroup.com
dholt@consumerenergyalliance.org
djuvet@BIAofNH.com
dlittell@bernsteinshur.com
donald.m.kreis@oca.nh.gov
downesm@unitil.com
dweeks@revisionenergy.com
eborden@synapse-energy.com
eburgess@strategen.com
edward.davis@eversource.com
eemerson@primmer.com
egreen@clf.org
eisfeller@unitil.com
elizabeth.r.nixon@energy.nh.gov
Energy-Litigation@energy.nh.gov
Erica.Menard@libertyutilities.com
erik.gilbert@navigant.com
erik.mellen@eversource.com
fortunat@revisionenergy.com
furino@unitil.com
glenn@scenicnursery.net
golding@communitychoicepartners.com
greg@clearpath.energy
harringt1@metrocast.net
heather.tebbetts@libertyutilities.com
HerbArcher3@gmail.com
info@mainstreetbookends.com
ipahl@icloud.com
isabelle.hazlewood@eversource.com
jack.kenworthy@waldenrenewables.com
james.diluca@eversource.com
jameskw@nhbfa.com
jeb.bradley@leg.state.nh.us
jessica.chiavara@eversource.com

jim_obrien@tnc.org
jkennerly@seadvantage.com
joliver@vermontlaw.edu
joshua.w.elliott@energy.nh.gov
jpvitello@gmail.com
jsohn@safarienergy.com
jvanrossum@clf.org
karen.sinville@libertyutilities.com
katherine.peters@eversource.com
katherine.provencher@eversource.com
Katherine.roberge@eversource.com
kfiori@nexamp.com
kfriend@nexamp.com
kim.quirk@gmail.com
kkoch@biaofnh.com
kroll@gcglaw.com
lbourgoine@revisionenergy.com
mark.p.toscano@energy.nh.gov
Mark@colonialpowergroup.com
mbrown@consumerenergyalliance.org
melissa.price@eversource.com
Melissa.Samenfeld@libertyutilities.com
mhorne@hcc-law.com
michael.j.sisto@energy.nh.gov
michael.sheehan@libertyutilities.com
Michelle.Azulay@libertyutilities.com
mmineau@essexhydro.com
mulin@revisionenergy.com
nathan@votesolar.org
nhregulatory@eversource.com
nkrakoff@clf.org
ocalitigation@oca.nh.gov
palma@unitil.com
paul.b.dexter@energy.nh.gov
pbean@solarcity.com
pchernick@resourceinsight.com
pmartin2894@yahoo.com
ran@essexhydro.com
rburke@nhla.org
rebecca.ohler@des.nh.gov
rlabrecque@agilitasenergy.com
robertbackus05@comcast.net
sabaker@trccompanies.com
sam@cleanenergynh.org
samuel.crawford@navigant.com
sandra.gagnon@eversource.com
scott.anderson@eversource.com
smaslansky@nhcdfa.org
sormsbee@colonialpowergroup.com
sprague@unitil.com
sshenstone-harris@synapse-energy.com
stettenheim@norwichtech.com
steveh@revisionenergy.com
stower@nhla.org
t.macdowell@standardpower.com
tad.montgomery@LebanonNH.gov
tanya.p.wayland@energy.nh.gov
taylorp@unitil.com
teamnh@energyservicesgroup.net
thomas.c.frantz@energy.nh.gov
tmichelman@seadvantage.com
tomb@crossborderenergy.com
twoolf@synapse-energy.com