

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
ELECTRIC AND GAS UTILITIES

Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation
of Customer-Generators

DOCKET NO. DE 22-060

PETITION FOR INTERVENTION
KEARSARGE SOLAR LLC

Pursuant to the Supplemental Order of Notice issued on November 18, 2024 (“Supplemental Order”) by the New Hampshire Public Utilities Commission (the “Commission”) in the above-captioned docket, N.H. Admin. Rules Puc 203.17 and Puc 203.02, and in accordance with the standards of RSA 541-A:32, Kearsarge Solar LLC (“Kearsarge”) hereby petitions for leave to intervene in this proceeding. In support of its Petition, Kearsarge states the following:

1. The Supplemental Order sets forth new phases to this proceeding to consider additional changes to New Hampshire’s net metering tariffs. It provides that “any entity or party seeking to intervene in the proceeding shall file with the Commission a petition to intervene . . . on or before January 2, 2025” (Supplemental Order at page 8).

2. Kearsarge is a limited liability company incorporated pursuant to the laws of the Commonwealth of Massachusetts with a principal place of business at 1380 Soldiers Field Road, Suite 3900, Boston, Massachusetts 02135.

3. Kearsarge is a renewable energy company engaged in project development, finance, and ownership and operation. Kearsarge currently owns and operates over 295 megawatts of direct current/megawatt hours (“MW DC/MWh”) of distributed generation solar photovoltaic and battery

energy storage systems in New England and New York with a further pipeline of 375 MW DC/MWh currently under development.

4. Kearsarge has a strong presence in New Hampshire. Kearsarge currently has under development 23 municipal net metering projects totaling 121 MW DC and 6 group net metering projects each smaller than 1 megawatt of alternating current (“MW AC”) totaling 6.3 MW DC. These projects span the state and are located on both private land and public land. The Department of Energy recently designated three of these projects as Electric Assistance Program Low-Moderate Income community solar projects through a competitive bidding process. Kearsarge’s net metering projects under development and sited on public land include those awarded by Belknap County, Bow, Concord, Farmington, Hudson, and the Pelham School District. Kearsarge also owns and operates a 3.3 MW DC municipal net metering project located on the Manchester landfill, which entered commercial operations in December 2021 and provides Manchester with guaranteed electricity savings and additional revenues through long-term lease and tax revenues.

5. The changes to the net metering tariff structure considered under the Supplemental Order would alter the compensation these projects receive, affecting not only Kearsarge’s financial investment in them but also Kearsarge’s contractual obligations to the landowners hosting projects and the low-moderate income residents and municipalities or other public entities that will receive or are already receiving net metering credits from projects as offtakers.

6. In addition to landowners and offtakers, these projects benefit a wide array of stakeholders. Municipalities in which projects are located can receive up to \$3,500 per MW AC through payment in lieu of tax agreements, while those in the construction and electrical trades can earn an estimated \$900,000 per MW AC in construction wages and an estimated \$1,276,343 per MW AC in facility

maintenance wages over a twenty-year term. Lastly, Kearsarge's projects in development across the state will generate enough energy to avoid billions of pounds of carbon dioxide emissions.

7. The above facts show that the proceeding undertaken pursuant to the Commission's Supplemental Order to consider changes to the net metering structure will directly impact the rights, duties, privileges, immunities, and other substantial interests of Kearsarge.

8. Kearsarge's participation in the proceeding will be in the interest of justice and will not impair the orderly and prompt conduct of this proceeding, nor will it delay the proceedings.

9. Kearsarge respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted on this the 2nd day of January, 2025.

By:  _____

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