

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 22-060

ELECTRIC DISTRIBUTION UTILITIES

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

Order Denying Liberty's Request to Delay Application of Application Fees

ORDER NO. 27,088

December 17, 2024

In Order No. 27,074 (November 18, 2024), the Commission authorized the electric distribution utilities to charge application fees to individual customer-generators seeking to interconnect as net-metering customers starting January 1, 2025, as well as to implement a reconciliation mechanism to pass any over-collections to ratepayers. The purpose of these fees was to cover the administrative costs of processing application fees, which are currently borne by the electric distribution utilities and passed on to their ratepayers. The fees were first proposed by a coalition of parties in August 2024. At hearing, there was uncontested testimony that these fees were appropriate because they would help reduce cost-shifting between net-metered and non-net-metered customers, and all parties supported approval of the fees at both the hearing and in their post-hearing filings. The Commission approved these fees because it found that they would reduce cost-shifting by ensuring that the administrative costs of processing interconnection agreements were being borne by the direct beneficiaries of interconnection—the customer-generator filing the application—and not the utilities' general ratepayers.

After the Commission issued Order No. 27,074, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (Liberty) filed a request to allow the company to delay

both the application of the fees and implementation of the related reconciling mechanism. In that filing, Liberty represents that the delay is appropriate because it has received significantly fewer interconnection applications in 2024 than it projected, having projected 1,226 applications but only receiving 283 as of late November, and believes this trend will extend into 2025. Due to this projected reduced volume of applications, Liberty represents that it is “adequately equipped to manage the current pace of new applications without the need for additional administrative resources and a corresponding reconciling rate component at this time.” Liberty’s Letter Requesting Delay of Application Fees at 1. Liberty’s filing does not provide a new timeframe for implementing a fee schedule and states only that the issue could be “revisited when Liberty expects to incur incremental administrative expenses.” *Id.*

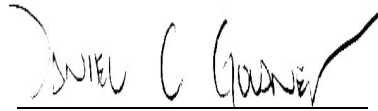
The Commission DENIES Liberty’s request because the company has not provided a sufficient basis for delaying the implementation of the fees. Most importantly, while the lower volume of applications may make the fees less necessary than projected, they will still help to reduce cost-shifting by covering the costs of processing applications and Liberty has not explained why it would be detrimental to implement them. It does not seem particularly burdensome to implement a fee schedule for interconnection applications and, if anything, the lower volume of applications would make the process even easier. Finally, the Commission disagrees that it is appropriate to delay the implementation of fees based on the current volume of applications. Notably, if Liberty delays establishing a fee schedule until the company experiences an increase in applications, it will not be able to recover costs for processing at least some percentage of these applications because there will be no fee schedule in place at that time.

Based upon the foregoing, it is hereby

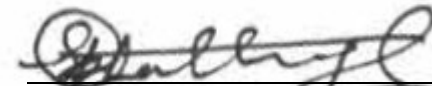
ORDERED, Liberty's request to delay the implementation of administrative fees is DENIED; and it is

FURTHER ORDERED, that Liberty shall file notice to the Commission of which reconciling mechanism it intends to use for the reconciliation of application fees by December 20, 2024 and comply with the tariff compliance requirements in Order No. 27,074 by December 27, 2024.

By order of the Public Utilities Commission of New Hampshire this seventeenth day of December, 2024.



Daniel C. Goldner
Chairman



Pradip K. Chattopadhyay
Commissioner

Service List - Docket Related

Docket#: 22-060

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Email Addresses

ClerksOffice@puc.nh.gov
nhregulatory@eversource.com
denise@colonialpowergroup.com
HerbArcher3@gmail.com
bargetsinger@keyesfox.com
Christopher.aslin@doj.nh.gov
Michelle.Azulay@libertyutilities.com
robertbackus05@comcast.net
sabaker@trccompanies.com
tomb@crossborderenergy.com
andrew.belden@eversource.com
Clifton.Below@CommunityPowerNH.gov
eborden@synapse-energy.com
lbourgoine@revisionenergy.com
jeb.bradley@leg.state.nh.us
mbrown@consumerenergyalliance.org
eburgess@strategen.com
rburke@nhla.org
brian.callnan@communitypowernh.gov
Mark@colonialpowergroup.com
glenn@scenicnursery.net
carroll@unitil.com
clyde.carson@gmail.com
pchernick@resourceinsight.com
jessica.chiavara@eversource.com
dclapp@revisionenergy.com
samuel.crawford@navigant.com
ariel.crowley@navigant.com
edward.davis@eversource.com
debski@unitil.com
Deana.Dennis@CommunityPowerNH.gov
Energy-Litigation@energy.nh.gov
paul.b.dexter@energy.nh.gov
james.diluca@eversource.com
downesm@unitil.com
eisfeller@unitil.com
joshua.w.elliott@energy.nh.gov

eemerson@primmer.com
sam@cleanenergynh.org
kfiori@nexamp.com
kfriend@nexamp.com
furino@unitil.com
sandra.gagnon@eversource.com
erik.gilbert@navigant.com
aglaserschhoff@synapse-energy.com
golding@communitychoicepartners.com
cgordon@revisionenergy.com
egreen@clf.org
austin.perea@arcadia.com
harringt1@metrocast.net
bhavumaki@synapse-energy.com
b.hayden@standardpower.com
isabelle.hazlewood@eversource.com
greg@clearpath.energy
alex.hill@dunsky.com
steveh@revisionenergy.com
dholt@consumerenergyalliance.org
mhorne@hcc-law.com
jameskw@nhbfa.com
jkennerly@seadvantage.com
jack.kenworthy@waldenrenewables.com
david@clearpath.energy
bking31415@gmail.com
nkrakoff@clf.org
donald.m.kreis@oca.nh.gov
anirudh.kshemendranath@dunsky.com
rlabrecque@agilitasenergy.com
alexandra.k.ladwig@energy.nh.gov
clane@synapse-energy.com
alesko@preti.com
dlittell@bernsteinshur.com
Business.Agent@ibew490.org
t.macdowell@standardpower.com
manzelli@nhlandlaw.com
alexmarquez146@gmail.com
pmartin2894@yahoo.com
smaslansky@nhcdfa.org
Alyssa.Maston@libertyutilities.com
erik.mellen@eversource.com
Erica.Menard@libertyutilities.com
tmichelman@seadvantage.com
mmineau@essexhydro.com
clayaz23@gmail.com

tad.montgomery@LebanonNH.gov
info@mainstreetbookends.com
elizabeth.r.nixon@energy.nh.gov
amanda.o.noonan@energy.nh.gov
ran@essexhydro.com
jim_obrien@tnc.org
ocalitigation@oca.nh.gov
joliver@vermontlaw.edu
sormsbee@colonialpowergroup.com
ipahl@icloud.com
palma@unitil.com
austin.perea@arcadia.com
deandra.m.perruccio@energy.nh.gov
katherine.peters@eversource.com
nathan@votesolar.org
melissa.price@eversource.com
katherine.provencher@eversource.com
kim.quirk@gmail.com
brian.rice@eversource.com
Katherine.roberge@eversource.com
bross@consumerenergyalliance.org
Melissa.Samenfeld@libertyutilities.com
michael.sheehan@libertyutilities.com
sshensstone-harris@synapse-energy.com
david.j.shulock@energy.nh.gov
karen.sinville@libertyutilities.com
michael.j.sisto@energy.nh.gov
chris@cleanenergynh.org
jsohn@safarienergy.com
sprague@unitil.com
stettenheim@norwichtech.com
anthony.strabone@libertyutilities.com
taylorp@unitil.com
teamnh@energyservicesgroup.net
mark.p.toscano@energy.nh.gov
stower@nhla.org
mulin@revisionenergy.com
jvanrossum@clf.org
jpvitello@gmail.com
tanya.p.wayland@energy.nh.gov
dweeks@revisionenergy.com
david.wiesner@eversource.com
twoolf@synapse-energy.com
Adam.Yusuf@Libertyutilities.com