THE STATE OF NEW HAMPSHIRE BEFORE
THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

JOINT TESTIMONY OF
Edward A. Davis, Brian J. Rice, Dawn Coskren on behalf of PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
Karen M. Asbury and John J. Bonazoli on behalf of UNITIL ENERGY SYSTEMS, INC. d/b/a UNITIL, INC.
and
Dilip K. Kommineni and Laura Sasso on behalf of LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. d/b/a LIBERTY

CONSIDERATION OF CHANGES TO THE CURRENT NET METERING TARIFF STRUCTURE, INCLUDING COMPENSATION OF CUSTOMER-GENERATORS

Docket No. DE 22-060

August 11, 2023

INTRODUCTION

Q. Mr. Davis, please state your name, business address and position.

A. My name is Edward A. Davis. My business address is 107 Selden Street, Berlin, CT 06037. My position is Director, Rates at Eversource Energy Service Company and in that position I provide rate and tariff related services to the operating companies of Eversource Energy including Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”).
Q. Please describe your educational background and professional experience.

A. I hold a Bachelor of Science degree in Electrical Engineering from the University of Hartford and Master of Business Administration from the University of Connecticut. I joined Northeast Utilities, now Eversource Energy, in 1979 and have held various positions in the areas of consumer economics, engineering and operations, wholesale and retail marketing and rate design, regulation and administration.

Q. Have you previously testified before the New Hampshire Public Utilities Commission?

A. Yes. I have on many occasions testified before the New Hampshire Public Utilities Commission (“Commission”) on behalf of Eversource, and at the state utility commissions in Connecticut and Massachusetts on behalf of other Eversource Energy affiliates on rate related matters.

Q. Mr. Rice, please state your name, business address and position.

A. My name is Brian J. Rice. My business address is 247 Station Drive, Westwood, MA 02090. My position is Director, Customer Solar Programs at Eversource Energy Service Company and in that position I provide oversight of solar programs for Eversource customers in multiple New England states.

Q. Please describe your educational background and professional experience.

A. I hold a Bachelor of Science degree in Industrial Economics from Union College and
Master of Business Administration degree from the Boston College Carroll Graduate School of Management. I’ve held positions in different functions at Eversource since 2011 associated with wholesale energy markets, tariff design and regulatory requirements. Prior to joining Eversource I held consulting positions covering various segments of the energy and utility industries.

Q. Have you previously testified before the Commission?
A. Yes, I have testified in front of the Commission on several occasions including in Docket Nos. DE 19-197 on the Statewide Energy Data Platform, DE 21-078 Eversource’s electric vehicle make-ready and demand charge alternative proposals, and DE 20-170 on electric vehicle time of use rates.

Q. Please state your name, business address, company position, and principal responsibilities in your current position.
A: My name is Dawn Coskren, I work at 73 West Brook Street in Manchester, New Hampshire. I work for Eversource Energy Service Company as Manager for Billing and Data Management for PSNH and Eversource Energy’s affiliate in Western Massachusetts. In this role I’m responsible for managing activities associated with billing and meter data management of Eversource Energy and establishing practices to ensure that accurate bills are issued in a timely manner.
Q. Please provide your educational and professional background.

A: I have an Associates of Science in Business Administration Management and a Bachelor of Arts in Communications from Southern New Hampshire University. I have over 20 years of experience in customer service in leadership positions.

Q. Have you previously testified before the Commission?


Q. Ms. Asbury, please state your name, business address and position.

A: My name is Karen M. Asbury. My business address is 6 Liberty Lane West, Hampton, New Hampshire 03842. I am the Director of Regulatory Services for Unitil Service Corp. which provides centralized management and administrative services to all Unitil Corporation’s affiliates including Unitil Energy Systems, Inc.

Q. Please describe your educational background and professional experience.

A: In 1987, I graduated magna cum laude from the University of New Hampshire with a Bachelor of Science Degree in Mathematics. I joined Unitil Service Corp. in January 1988 and have held various positions in the regulatory/rate department. In my current position, I am responsible for directing regulatory filings, pricing research, analysis, and design, tariff administration, customer research, and other analytical services.
Q. **Have you previously testified before the Commission?**

A. Yes. I have testified before the New Hampshire Public Utilities Commission ("Commission") and the Massachusetts Department of Public Utilities on behalf of Unitil and its affiliates.

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Q. **Mr. Bonazoli, please state your name, business address and position.**

A. My name is John J. Bonazoli, I am the Manager of the Distribution Engineering Department at Unitil Service Corp. which provides centralized management and administrative services to all Unitil Corporation’s affiliates including Unitil Energy Systems, Inc.

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Q. **Please describe your educational background and professional experience.**

A. In 1987, I received my Bachelor of Science degree in Electrical Engineering from Northeastern University. I also graduated from Lesley University, in 1993, with a Master of Science degree in Management. I am a registered Professional Engineer in the State of New Hampshire and the Commonwealth of Massachusetts. I joined Unitil Service Corp. in April, 1999 and have held various positions in the Engineering Department. In my current position, I am responsible for managing the planning of the electric system and interconnection of all Distributed Energy Resources (DER).

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Q. **Have you previously testified before the Commission?**

A. Yes. I have testified before the New Hampshire Public Utilities Commission
Mr. Kommineni, please state your name, business address and position.

A. My name is Dilip K. Kommineni. My business address is 9 Lowell Road, Salem, NH 03079 and I am employed as the Sr. Manager of Engineering by Liberty Utilities Service Corp. ("LUSC"), which provides services to Liberty Utilities (Granite State Electric) Corp. ("Liberty").

Please describe your educational background and professional experience.

A. In 2005, I received a Bachelor of Science from the Anna University at Chennai, TN (India). I graduated from Syracuse University in 2006 with a Master of Science in Electrical Engineering. In 2010, I received a Master of Business Administration from Le Moyne College. I joined National Grid in July 2006 as an intern and was employed full time in January 2007. Since that time, I have held several roles of increasing responsibility in protection, reliability, and distribution engineering, and obtained my professional engineering license from New York. I joined LUSC as Senior Manager of Engineering, where I am responsible for the safe and reliable operation, design, and maintenance of the electric system for Liberty in New Hampshire.

Have you previously testified before the Commission?

A. No, I have not testified before the Commission.
Q. **Ms. Sasso, please state your name, business address and position.**

A. My name is Laura Sasso. I am employed by LUSC as a Senior Manager, Billing, East Region, providing services to the Liberty affiliates in the East Region, including Liberty. My office address is 15 Buttrick Road, Londonderry, New Hampshire. I have been with Liberty for 11 years and have been in the industry for 27 years.

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Q. **Have you previously testified before the Commission?**

A. Yes, I filed testimony in Docket No. DE 23-063, the Joint Utilities' Petition for Waiver of Certain Provisions of the Puc 2200 Rules.

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Q. **What is the purpose of your testimony?**

A. The purpose of Eversource, Unitil, and Liberty’s (the “Joint Utilities”) testimony is to assess the current compensation levels for net metering customers in New Hampshire and address possible changes to the net metering tariff that may be up for consideration at this time.

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Q. **How is your testimony organized?**

A. Our testimony begins by assessing the current net metering tariff compensation structure, examines whether changes are warranted, presents the current efforts and resources needed to administer the current net metering program, and finally suggests a modest application fee structure to mitigate potential cost shifts and allow the Joint Utilities to be more acutely responsive to increases in demand for distributed generation projects. This
Q: Please summarize current net metering tariffs available to New Hampshire electricity customers.

A: Current net metering policies are enumerated in New Hampshire Code of Administrative Rules Chapter Puc 900: Net Metering for Customer-Owned Renewable Energy Generation Resources of 1,000 Kilowatts or Less, and are distinct for small customer-generators whose facility has a total maximum generating capacity of not more than 100 kW, and for large customer-generators whose facility has a total maximum generating capacity greater than 100 kW, up to and including 1 MW. Beginning in September 2017, when the current net metering took effect, any new small customer-generators receive monetary bill credits for net electricity exports over a billing period calculated at 25 percent of any distribution charges assessed on a per-kWh basis, any transmission charges assessed on a per kWh-basis and, for default service customers, the default service rate assessed on a per-kWh basis. Non-bypassable charges for new small customer-generators are assessed based on the full amount of electricity received from the distribution system without any netting of electricity exports over the billing period.

New large customer-generators are only eligible for net metering if at least 20 percent of the actual or estimated annual electricity generation from its facility is consumed behind-the-meter, or if it has registered as a group host. Eligible large customer-generators
currently receive monetary bill credits for net electricity exports over a billing period calculated at the default service-rate assessed on a per-kWh basis. The original standard net metering tariff is grandfathered for any projects approved before the adoption of the current net metering tariff, and those grandfathered provisions will apply until they sunset in 2040.

Q: Please describe the level of customer participation in current net metering tariffs.

A: Current net metering tariffs are effectively supporting opportunities for New Hampshire customers to install distributed generation resources that reduce customer costs and contribute incremental sources of renewable energy to the New Hampshire generation mix. This has particularly been the case as the cost of renewable generation has declined and wholesale energy costs increased. Customer participation in net metering has risen significantly in the last couple of years. Last year, new net metering project applications received nearly tripled for Eversource from 1,508 in 2021 to 4,152 in 2022. Unitil saw notable increases for new project applications of 53%, from 905 applications in 2021 to 1,387 applications in 2022. Liberty also experienced significant growth in new project applications, with an increase of 160%, rising from 126 applications in 2021 to 328 applications in 2022. This year, Eversource, Unitil, and Liberty are on track to see a continued increase, with 2,352, 813, and 351 applications received as of July 1, 2023, respectively. Overall, the steady increase in participation and the sharp uptick beginning in 2022 has resulted in a robust net metering market in New Hampshire.
Q: Do current net metering tariffs balance the interests of customer-generators with those of non-net metered customers?

A: The Joint Utilities believe they do. A large portion of credit provided to customer-generators through the net metering tariff is directly tied to the wholesale cost of energy reflected within default service rates and generally avoided or realized through utility market activity. This ensures a large portion of net metering credit remains market-based and distributed generation development in New Hampshire is market-driven, as has been demonstrated through recent increases in solar deployment in response to changes in energy supply rates. This shows that the current net metering tariff encourages customers to make investment decisions based on real market conditions, and not just level of subsidization.

Current net metering tariffs do risk shifting costs to non-net metered customers by providing credit in excess of the wholesale market value of energy, in this instance, the full default service rate, along with a portion of distribution and transmission rates, but the risk of significant cost shifting in New Hampshire is mitigated by several factors. The current net metering tariff limits credit for distribution and transmission values to only small customer-generators, providing credit for excess generation at only 25 percent of the distribution rate and providing credit for only kWh-based retail rates limits the amount of credit provided to New Hampshire customer-generators that may exceed the wholesale energy market value of energy and risk shifting costs to non-net metered customers. Net metering tariff designs which have more expansive customer eligibility
or issue credits for larger portions of retail rates (i.e. for rates other than supply-related
rates) are at higher risk of shifting costs to non-net metered customers.

The Joint Utilities also generally agree that distributed generation facilities can provide
greater benefits than larger generation resources by reducing line losses, lowering peak
loads on portions of the distribution system and diversifying energy resources. These
benefits are more difficult to objectively quantify and are likely to vary based on resource
type and location on the electric power system, but they should be considered in any
assessment of the balance of Customer-Generator interests with those of non-net metered
customers. This is consistent with the 2022 update to the New Hampshire Ten Year State
Energy Strategy, which states: “Having a diverse resource mix can help ensure a
secure, reliable, and resilient energy system.” (New Hampshire 10-Year State Energy
Strategy at page 39, emphasis in original).

The actual costs and benefits of distributed generation facilities are difficult to completely
validate and the current net metering structure does create a risk that electric power
system costs could be shifted from net metered customers to non-net metered customers.
However, the Joint Utilities do not believe the current net metering structure is creating a
clear or significant imbalance between the interests of net metered and non-metered
customers that requires the Commission to address through significant revisions to the
existing net metering tariff.
Q: Should the Commission implement new alternative net metering tariffs?

A: The Joint Utilities do not recommend new alternative net metering tariffs at this time. The current net metering tariffs are not creating clearly unbalanced outcomes that merit correcting. A growing number of New Hampshire residents and businesses are increasingly able to make renewable energy choices that reduce their electric bills and introduce potential indirect benefits that are realized by all customers. Moreover, the current net metering tariff is a workable model that is administratively efficient and aligned with technical capabilities, further ensuring an equitable net metering program. If the Commission were to consider alterations to the existing tariff, the Joint Utilities recommend that the Commission consider only limited adjustments to the existing net metering tariffs, and that any such adjustments maintain the level of facility of administration and work within respective technical capabilities and processes to prevent any incremental administrative or equipment and system costs. Costs that are not necessarily commensurate with benefits would have an overall effect of diluting the cost effectiveness of the New Hampshire net metering program, increasing the cost shift to non-net metered customers.

Q: Should the Commission consider alternative rate structures, including time-based tariffs?

A: Alternative rate structures are not necessary right now and would not be practicable or necessarily appropriate for incorporation into a net metering program in New Hampshire. Current rate structures provide adequate opportunity for New Hampshire customers to
choose renewable energy options and balance interests with non-net metered customers. Adding time-varying rate structures would add significant complexity to administration of the net metering program, without commensurate benefits or making the program all that much more equitable than it is presently.

Time differentiated pricing may not significantly change value for many customers, but would likely require additional expenditures in meter and billing systems. Netting energy over a monthly period dilutes the temporal distinction of such pricing, especially as applied to any net exports, and is consistent with a non-time differentiated net meter tariff. Any element of pricing associated with potential net metering alternatives must be given due consideration, no matter the type of pricing structure; this includes supply, transmission and distribution components of rates. Primary considerations when contemplating more complex net metering tariffs include costs and cost effectiveness of metering as metering technology develops, and utility data management and billing systems are upgraded or replaced.

Q: Should monetary credit provided through net metering tariffs be adjusted to include compensation for services and value currently not compensated, such as avoided transmission, distribution, and capacity costs?

A: No, further adjustments are not required. There is no evidence that current net metering tariffs undercompensate customer-generators for services and value they provide. As explained previously, small customer-generators already receive credit for
the distribution and transmission portions of their bills. All customer-generators also receive credit for excess generation at the default energy service rate, which reflects the wholesale cost of generation capacity and other costs incorporated into the default energy service rate. Current net metering tariffs provide credit to customer-generators in a way that strikes a balance with the interests of all other customers and, as discussed previously, net metering tariff designs with more expansive eligibility and offer credits for larger portions of retail rates are at higher risk of shifting costs to non-net metered customers as either larger credits or expanded participation can increase overall program costs which are born by all customers.

Q: Should net metering tariffs limit the total capacity of net metering within each utility's service territory?

A: No. Prior to the implementation of the currently effective alternative net metering structure, eligibility for the original standard net metering tariff was limited to the first 100 MW of generating capacity. However, the standard net metering tariff also provided a larger credit for excess generation to customer-generators as compared to the alternative net metering tariff. In contrast, availability of the alternative net metering tariff was not limited regarding the total capacity of net metered facilities statewide when it was adopted and the Joint Utilities do not believe it needs to be limited. The current alternative net metering structures already include features that mitigate the risk of significant imbalances between net metered and non-net metered customers. Further limits on the availability of alternative net metering are not required at this time to
preserve an equitable balance in customer interests.

Q: Should new net metering tariffs be adopted that apply to newly constructed customer-generators with a total peak generating capacity of greater than one megawatt?

A: Generating facilities with total peak generating capacity of greater than 1 MW are currently permitted to interconnect to the electric distribution system by following established processes, operate and obtain revenue through participation in regional energy markets. The Joint Utilities take no position on whether new metering tariffs should be adopted to provide such facilities greater than 1 MW another commercial option by making net metering available in lieu of directly participating in the wholesale market, but believes there are both advantages and disadvantages that the Commission should consider.

Facilities with a generating capacity of greater than 1 MW are typically able to take advantage of economies of scale and be successfully developed at lower unit cost than smaller facilities. The installed cost of solar generating facilities greater than 1 MW enrolled in the Solar Massachusetts Renewable Target (“SMART”) Program has averaged $2.13/W while the cost of facilities with capacity of 500-1,000 kW has averaged $2.43/W, a cost difference of roughly 15 percent.¹ Permitting lower cost

¹ Figures as of July 2023: https://www.mass.gov/doc/smart-solar-tariff-generation-units
resources to participate in net metering tariffs may expand opportunities for New Hampshire customer-generators to install generating resources that reduce customer costs and further diversify the generation mix of New Hampshire.

Permitting participation of larger generating facilities in the net metering tariff may also expand opportunities for more New Hampshire customers to participate in net metering programs and realize cost savings from renewable generation. Puc 909 that establishes the parameters of current group net metering enable customer-generators to host facilities that generate electricity in excess of their own electrical usage and distribute credit for that excess generation to other utility customers, either directly or through on-bill credits. This structure enables customers who are less able to install onsite generation at their premise to support and benefit from net metered generating facilities as group members. Larger facilities may enable more customers, including low-income customers, to participate in these shared generation arrangements.

However, the Commission may also consider that larger generating facilities may be less likely to provide certain benefits as compared to small distributed generation facilities. Generating facilities that must be sited on larger parcels of land may be less likely to be situated on portions of the distribution system where output would offset nearby loads. Not only would such facilities be less likely to have beneficial impacts on net loads, their operation may negatively impact system operations and require the utility to complete, at the interconnecting customer’s expense, upgrades to the distribution system to maintain
safe and reliable operations. Other New England states that have permitted facilities
greater than 1 MW to participate in net metering tariffs have experienced significant
saturation of many circuits, necessitating that utilities plan substantial system upgrades to
enable further distributed generation development. Lastly, the Commission should
consider that a 1 MW solar generating facility will require several acres of land for siting
and larger facilities will have commensurately larger footprints. The Commission should
ensure such a change remains appropriately balanced with land use policies of New
Hampshire communities.

Q: Should the Commission consider other regulatory mechanisms for customer-
generators?

A: Yes. The Joint Utilities recommend the Commission consider approving application fees
that better support Joint Utilities’ administrative processes to interconnect and enroll
growing numbers of customer-generators in net metering tariffs. Approval of modest
application fees are not expected to be a barrier to customer installation of distributed
generation, but would provide funds that would respond to changes in customer interest
in clean energy options and mitigate the risk of non-net metered customers contributing
to the unique administrative costs of serving customers that choose to install distributed
generation and participate in net metering tariffs.
Q: Please describe the administrative requirements for interconnection and enrollment of customer-generators.

A: Utilities have had an increased need for dedicated staff and systems to support the acceptance, review and approval of the significant increase in applications for customer-generators to interconnect to the distribution system and operate distributed generation facilities. Recent increases in distributed generation applications has required Eversource to expand these resources to support service to customers. To more efficiently manage the customer-generator enrollment process, Eversource and Unitil are in the process of launching a dedicated online application portal for customer-generators, which will mitigate some of the staffing needs and expedite the application process, bettering the customer experience.

Once enrolled, billing customer-generators, sharing credits and other net metering tasks introduce unique requirements that often need some level of manual intervention to bill customer-generator accounts. The billing process also requires quality assurance and manual controls to ensure accurate billing and compliance with unique program requirements.

Q: Please describe the Joint Utility resources, broken out by utility that support, or are expected to support, interconnection and enrollment of customer-generators, as well as billing and maintenance of program administration.

A: As the state’s largest utility, the increased interest in distributed generation in
Eversource’s service territory has been most noticeable. As outlined previously, Eversource has experienced an almost tripling of net meter applications in 2022 when compared to 2021 and the 2023 year-to-date number of applications are exceeding the pace established in 2022. To accommodate this increase in Net Metering Applications, Eversource’s Distributed Generation Customer Care team who are responsible for processing interconnection applications, sending project status updates, and answering inquiries about the net metering program from customers and solar developers is increasing staffing levels to eight employees. These personnel also participate in the management of the Group Net Metering program (enrollment and annual reporting) and the REC Independent Monitoring program (enrollment & quarterly reporting) as mandated by DE 16-576. Additionally, there are six distribution engineers and two contractor engineers who perform technical reviews of interconnection applications and certificates of completion. Eversource estimates that 17% of their time is spent reviewing interconnection requests. Separate from the Distribution engineers who review applications and certificates of complete, Eversource has six DER Planning engineers responsible for pre-applications and interconnection requests to develop scope of studies and cost estimates. Approximately 60% of these employees’ time is spent on these tasks, which is not currently covered by existing recovery mechanisms or fees. Application fees will ensure well-matched resources for the demand of distributed generation, which applies to all the Joint Utilities.

The range of Eversource billing department tasks required to support net metering tariff
participation include:

- Billing six different net metering programs under three tariffed rates
- Exception processing of billed accounts: net metered accounts don’t credit on their own through Eversource billing systems; the systems kick out exceptions for Billing staff to take the necessary action to credit the customer account
- Monthly credit allocations and net meter credit payouts for Group Host accounts
- Alternate net metering payouts and required correspondence yearly and quarterly
- Standard net metering payouts and required correspondence yearly and quarterly
- Allocation and payout approvals
- Meter installs, exchanges and apply appropriate net meter program to each customer account
- Fielding customer questions, regulatory research
- Monthly net metering controls reports
- Required reporting of customer allocations to Group Host account

Unitil and Liberty have also experienced an increase in distributed generation applications necessitating committed resources. For Unitil, the primary responsibilities for supporting net metering, interconnection and enrollment of customer-generators, and billing and maintenance, fall within Regulatory Services, Customer Service, Distributed Energy Resource group, and Customer Energy Solutions. In the Regulatory Services department, Unitil has one Regulatory Analyst that reviews Group Net Metering applications in coordination with the Department of Energy, prepares rates for billing, and maintains data for reporting. Unitil estimates that 10 to 15% of the analyst’s time relates to this function in New Hampshire. The Customer Service department resources that support net energy metering and billing include a Capital Biller, a Seacoast Biller, Billing Support Analysts, Senior Billing Process Lead, and Billing Supervisor. The work they support is similar to Eversource including

- Monthly billing of net energy metering customers
- Fielding customer questions
• Annual true-up process of net energy metering credits
• Preparing monthly group host checks
• Set up and maintenance of new accounts and net energy metering credit allocations
• Monthly net energy metering control reports

Unitil estimates that 6% to 7% of the time of the group above relates to this function in New Hampshire.

Unitil’s Distributed Energy Resource (DER) support team includes a dedicated DER group who works solely on efforts of interconnecting DER as well as support from other Customer Service, Metering, and Operations departments. The DER group consists of four full-time employees and one or two temporary employees hired as needed. The full time employees include a manager, two DER analysts who process residential and small applications, and a DER Engineer who performs the analysis and administration for larger applications. The DER group process applications for New Hampshire and Massachusetts.

In addition to the DER group, a member of the Customer Energy Solutions team supports the DER interconnection efforts in answering customer questions and shepherding the communications to DER customers. It is estimated that approximately 25% of their time is spent supporting New Hampshire DER interconnection applications. Technical support of larger DER interconnections is provided by three distribution planning engineers, and the Protection Department who analyze their associated interests of larger DER applications. Additional support is also provided by the Metering Department and
Operations Departments in providing cost estimates and system asset installation as needed.

For Liberty, the duties related to supporting net metering, facilitating interconnection and customer-generator enrollment, as well as handling billing and maintenance, are assigned to the Resource Planning, Engineering, Billing, Finance, Business Community and Development, Project Management, Mapping, Operations, Regulatory, and Legal departments. Within the Resource Planning department, one dedicated Resource Coordinator oversees the assessment of net metering applications at Liberty. This individual reviews and processes applications, furnishes project progress updates, addresses inquiries about the net metering program from both customers and solar developers, and manages the necessary data for mandated reporting. In cases where supplementary review or study fees are required from customers, the coordinator drafts payment documentation. The coordinator also works with the other teams to coordinate necessary upgrades for solar installations. Monthly and annual reporting procedures also fall within the coordinator’s purview. The Coordinator’s workload is exclusively dedicated to fulfilling net metering responsibilities. The Engineering department consists of three engineers dedicated for this efforts, two full time employees and one contractor who dedicate approximately 25% of their time. One full time employee processes residential and small applications, and the other full-time employee and one contract engineer perform the analysis and administration for larger applications.
Liberty’s Billing department resources that support net energy metering and billing include three Billers (one Billing Supervisor, one Billing Specialist, and one Billing Analyst) who dedicate 7% of their time. The work they support is similar to that described above by Eversource and Unitil, including:

- Billing six different net metering programs under three tariffed rates;
- Exception processing of billed accounts: the systems kick out exceptions for Billing staff to take the necessary action to credit the customer account;
- Monthly credit allocations and net meter credit payouts for Group Host accounts;
- Alternate net metering payouts and required correspondence yearly and quarterly;
- Standard net metering payouts and required correspondence yearly and quarterly;
- Allocation and payout approvals;
- Meter installs, exchanges and apply appropriate net meter program to each customer account;
- Fielding customer questions, regulatory research;
- Monthly net metering controls reports; and
- Required reporting of customer allocations to Group Host account.

Additional support is provided by Finance, Business Community development, Project Management, Mapping, Operations, Regulatory and Legal as needed.

Q: **Would application fees help balance the interests of customer-generators with those of non-net metered electric utility customers?**

A: Yes. Consistently collecting standard application fees would ensure the scalability of resources to support increased application volume and that customer-generators are contributing to the costs of the unique systems and dedicated staff that enable their safe interconnection and participation in net metering programs. Absent the collection of these fees, the Joint Utilities will further support administrative requirements unique to
customer-generators from revenues collected through base rates charged to all customers. Those amounts would also expand as interest in distributed generation and the corresponding requirements to support that increased interest expanded.

Q: Are there other anticipated benefits of approving an application fee structure for customer-generators?

A: Yes. Approved fees would provide responsive funding for the necessary Joint Utility resources, enabling the Joint Utilities to more nimbly expand staff and enhance systems to better serve customers as interest in distributed generation expands, minimizing any lag by avoiding the lengthier process of making regulatory adjustments.

Q: Is it the position of the Joint Utilities that the current net metering tariffs result in just and reasonable rates?

A: Yes it is.