

Orr&Reno

Douglas L. Patch
dpatch@orr-reno.com
Direct Dial 603.223.9161
Direct Fax 603.223.9061
Admitted in NH and MA

October 7, 2022

Via Electronic Mail

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429
ClerksOffice@puc.nh.gov

RE: DE 22-062 - Request for Approval of Enfield Community Power Electric Aggregation Plan - Comments of New Hampshire Electric Cooperative

Dear Chairman Goldner:

New Hampshire Electric Cooperative (“NHEC” or “the Cooperative”) provides the following comments on the Enfield Community Power Electric Aggregation Plan filed by the Town of Enfield in this docket on September 19, 2022, consistent with the requirement of RSA 53-E:7, 11 and the September 21, 2022 Order of Notice in this docket requiring utility comments on such a plan be filed within 21 days of submission of that plan.

The Cooperative fully supports the development of Community Power Aggregations (“CPAs”) and believes that they can be a powerful tool for providing “access to competitive markets for supplies of electricity and related services” and for encouraging “voluntary, cost effective and innovative solutions to local needs” as articulated in the statement of purpose in RSA 53-E:1. The Cooperative also strongly supports the ability of our members to access competitive supply options and was an early adopter of retail choice in New Hampshire. Consistent with this, the Cooperative provided aggregated, anonymized usage data to the Enfield Community Power Committee in December 2021. The Cooperative currently provides service to 172 accounts in the Town of Enfield.

The Cooperative is not rate-regulated by the New Hampshire Public Utilities Commission (“the Commission”) and is not subject to the Puc 900 Net Metering rules. In addition, the Cooperative was not subject to RSA 378:50-54, the Multi-Use Energy Data Platform.

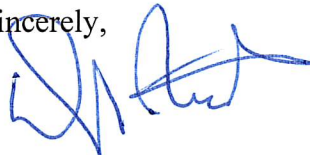
To serve our members, the Cooperative utilizes products and systems provided by National Information Solutions Cooperative (“NISC”) for member billing, information management, meter data management (“MDM”), accounting, engineering, and operational support. NISC provides similar services to over 900 electric cooperatives and public power members, five of which have customized their account management and billing software and enabled Electronic Data Interchange (“EDI”) processing to accommodate retail choice, and none of which provide municipal aggregation.

As a result, the Cooperative may need to seek a partial or complete waiver from certain provisions of the Puc 2200 rules once they become effective. These waiver requests will be filed to Docket No. DRM 21-142, or in some other manner which the Commission determines to be appropriate, as they would apply to all Community Aggregation Plans involving the Cooperative. Assuming waivers affirming the Cooperative’s deregulated rate structures, adherence to the current EDI standard, billing and metering system limitations, and realistic deployment timelines, the Cooperative does not have any significant concerns with Enfield’s plan.

As a procedural matter, the Cooperative requests that its dedicated community aggregation e-mail address be used when contacting NHEC regarding aggregation plans or related aggregation issues: CommunityAggregation@nhec.com. In addition, the Cooperative requests that the following e-mail addresses be added to the service list for this docket: CommunityAggregation@nhec.com and dpatch@orr-reno.com.

If you should have any questions, please do not hesitate to contact me at dpatch@orr-reno.com or the phone number listed above.

Sincerely,



Douglas L. Patch

DLP/eac

cc: Service List in DE 22-062 (via electronic mail)