

# Orr&Reno

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November 1, 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](mailto:ClerksOffice@puc.nh.gov)

***RE: DE 22-066 Request for Approval of Durham 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 Durham Community Power Electric Aggregation Plan filed by the Town of Durham in this docket on October 12, 2022, consistent with the requirement of RSA 53-E:7, 11 and the October 13, 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. The Cooperative currently provides service to 10 accounts in the Town of Durham.

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.

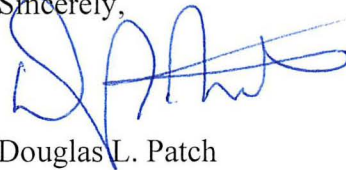
To serve our members, the Cooperative utilizes products and systems provided by National Information Solutions Cooperative (“NISC”) for member billing, information management, meter data management (“MDM”), accounting, engineering, and operational support. NISC provides similar services to over 900 electric 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 is planning to seek a partial or complete waiver from certain provisions of the recently adopted Puc 2200 rules. 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 concern’s with Durham’s plan.

As a procedural matter, the Cooperative requests that its dedicated community aggregation e-mail address be used when contacting NHEC: [CommunityAggregation@nhec.com](mailto: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](mailto:CommunityAggregation@nhec.com) and [DPatch@orr-reno.com](mailto:DPatch@orr-reno.com).

If you should have any questions, please do not hesitate to contact me at [DPatch@orr-reno.com](mailto:DPatch@orr-reno.com).

Sincerely,



Douglas L. Patch

cc: Service List in DE 22-066 (via electronic mail)