



**Westmoreland Community Power
Electric Aggregation Plan**

**As Approved by the Westmoreland Board of Selectmen
on
March 8, 2023**

Table of Contents

INTRODUCTION TO COMMUNITY POWER	1
OVERVIEW OF WESTMORELAND COMMUNITY POWER	2
CUSTOMER NOTIFICATION AND ENROLLMENT PROCESS	2
CUSTOMER ACCOUNTS AND ELECTRICITY USAGE ESTIMATES	3
MEMBERSHIP IN THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE	3
PURPOSE OF THIS ELECTRIC AGGREGATION PLAN	4
APPROVAL PROCESS FOR WESTMORELAND COMMUNITY POWER.....	4
IMPLEMENTATION PROCESS FOR THE COALITION & WESTMORELAND COMMUNITY POWER	5
<i>Development of Member Cost Sharing Agreement and Services for Westmoreland Community Power</i>	5
<i>Energy Risk Management & Financial Reserve Policies</i>	7
ELECTRIC AGGREGATION PLAN SUBMISSION TO THE PUBLIC UTILITY COMMISSION	8
COALITION & WESTMORELAND COMMUNITY POWER IMPLEMENTATION MILESTONE CHARTS.....	8
WESTMORELAND COMMUNITY POWER GOALS, OBJECTIVES, AND REQUIREMENTS	10
WESTMORELAND’S POLICY GOALS	11
WESTMORELAND COMMUNITY POWER OBJECTIVES	11
NEAR-TERM OPERATIONAL REQUIREMENTS.....	12
<i>Performance Relative to Utility Default Service and Net Energy Metering Generation Rates</i>	12
<i>Customer Rates and Products</i>	12
<i>Renewable Portfolio Standard Requirements</i>	12
ELECTRIC AGGREGATION PLAN STATUTORY REQUIREMENTS	14
ORGANIZATIONAL STRUCTURE OF THE PROGRAM.....	14
METHODS OF ENTERING INTO AND TERMINATING AGREEMENTS	14
OPERATION AND FUNDING	15
RATE SETTING, COSTS, ENROLLMENT PROCESS, AND OPTIONS	16
<i>Rate Setting and Costs</i>	16
<i>Enrollment Process and Options</i>	17
RIGHTS AND RESPONSIBILITIES OF PROGRAM PARTICIPANTS.....	18
NET METERING AND GROUP NET METERING POLICIES.....	18
ENSURING DISCOUNTS FOR ELECTRIC ASSISTANCE PROGRAM PARTICIPANTS	19
TERMINATION OF THE PROGRAM	20
ATTACHMENT 1: WESTMORELAND COMMUNITY POWER NET METERING, GROUP NET METERING AND LOW-MODERATE INCOME SOLAR PROJECT OPPORTUNITIES	I
ATTACHMENT 2: WESTMORELAND’S PUBLIC PLANNING PROCESS	V
ATTACHMENT 3: TOWN POLICY EXCERPTS	XI
ATTACHMENT 4: HOW LOAD SERVING ENTITY SERVICES WILL BE IMPLEMENTED	XII
RESPONSIBILITIES OF THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE (CPCNH)	XIII
RESPONSIBILITIES OF THE TOWN OF WESTMORELAND	XVI
ATTACHMENT 5: CUSTOMER DATA PROTECTION PLAN	XVIII
RESPONSIBILITIES OF THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE (CPCNH)	XVIII
<i>CPCNH REQUIREMENTS TO ACCESS AND USE OF INDIVIDUAL CUSTOMER DATA</i>	XXI
RESPONSIBILITIES OF THE TOWN OF WESTMORELAND	XXII
ADDITIONAL REFERENCES: STATUTORY AND REGULATORY REQUIREMENTS	XXIII
<i>STATUTORY REQUIREMENTS FOR COMMUNITY POWER AGGREGATORS & SERVICE PROVIDERS</i>	XXIV
<i>ADDITIONAL REQUIREMENTS SPECIFIC TO BROKERS & COMPETITIVE SUPPLIERS</i>	XXV
<i>ADDITIONAL REQUIREMENTS FOR THE MULTI-USE ENERGY DATA PLATFORM</i>	XXVI
ATTACHMENT 6: ABBREVIATIONS	XXVII

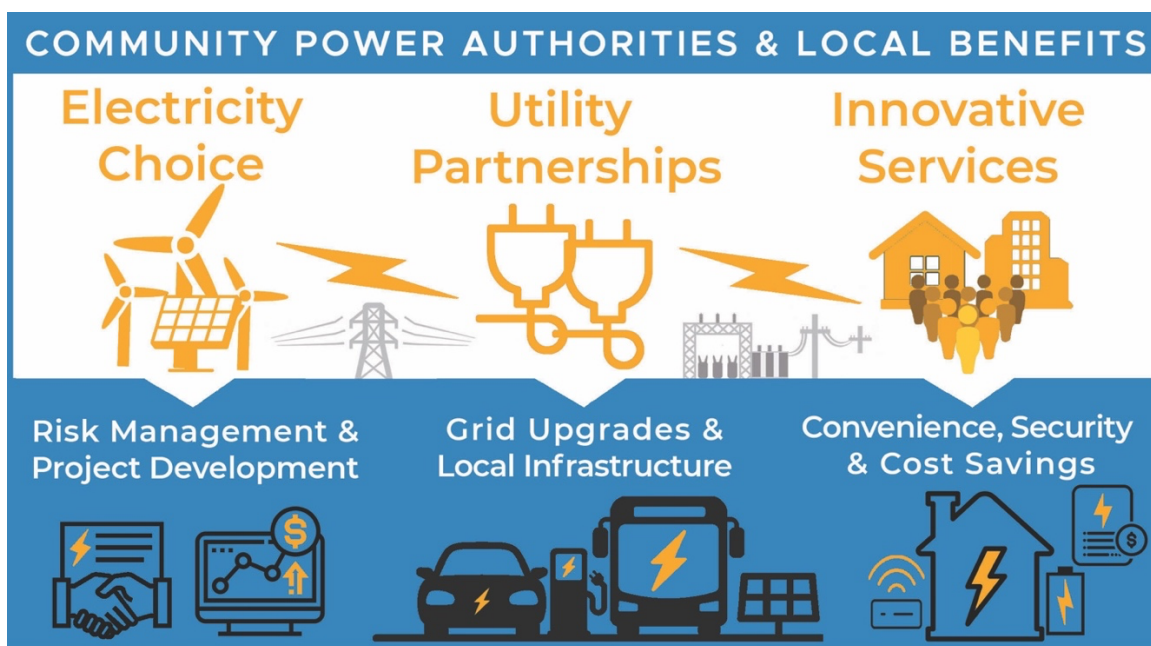
INTRODUCTION TO COMMUNITY POWER

New Hampshire's updated Community Power law ([RSA 53-E](#), as amended by SB 286, effective October 1, 2019) is a bipartisan policy designed to further democratize, evolve, and enhance the economic efficiency of our electric power industry.

The Legislature's intent in enacting RSA 53-E was to *"encourage voluntary, cost effective and innovative solutions to local needs with careful consideration of local conditions and opportunities."* (Refer to <https://www.cpcnh.org/legislative-context> for a summary of the legislative context and local control authorities of Community Power.) To achieve this goal, RSA 53-E authorizes local governments (cities, towns, and counties) to launch Community Power programs that:

- Provide electricity supply service to residents and businesses, who are notified and enrolled on an "opt-in" customer choice or "opt-out" default service basis and may thereafter leave or rejoin the program (by switching suppliers in advance of their next billing cycle date);
- Procure a reliable supply of "all-requirements" electricity, inclusive of Renewable Portfolio Standard requirements, with the option to participate directly in the ISO New England wholesale market (as a load-serving entity on behalf of participating customers);
- Offer a range of innovative services, products, new Net Energy Metering supply rates, and local programs to participating customers;
- Establish a joint powers agency with other Community Power programs to share services, contract for energy project developments, and facilitate related energy initiatives; and
- Work collaboratively with distribution utilities, regulators, policymakers, and innovative energy businesses to help modernize our electrical grid and market infrastructure.

These authorities and local benefits are depicted in the graphic below:



Distribution utilities will continue to deliver power to all customers, regardless of whether they are supplied electricity by new Community Power programs or Competitive Electric Power Suppliers (or have chosen to switch back to utility-provided default service).

OVERVIEW OF WESTMORELAND COMMUNITY POWER

Westmoreland Community Power is a program authorized under RSA 53:E to provide electricity supply service for the Town's residents, businesses, and other types of customers. Providing electricity supply involves being responsible for procuring electric generation (supply) to match customer loads (consumption) in real time, except when the grid goes down. The program will only launch if it is able to initially offer residential default rates that are lower than or competitive with those offered by Eversource. Thereafter, the program will:

- Serve as the default electricity supplier for all customers on a default "opt-out" basis;
- Offer innovative services and generation rates to customers on an "opt-in" or "opt-up" basis (such as 100% renewable premium products, time-varying rates and Net Energy Metering generation credits for customers with solar photovoltaics);
- Operate on a competitive basis, in that customers may choose to switch between Westmoreland Community Power, service provided by Competitive Electric Power Suppliers, and utility-provided default service; and
- Be self-funded through revenues generated by participating customers; the Town will not use taxes to cover program expenses.

Eversource will continue to own and operate the distribution grid and be responsible for delivering power to all customers within the Town. Customers will continue be charged for utility delivery services at rates set by the Public Utilities Commission.

The Board of Selectmen, in coordination with advisory support from the Westmoreland Community Power Advisory Committee, will authorize the Town Administrator to contract for the necessary services and power supplies to implement and operate the program prior to program launch and continue to provide oversight over the program thereafter.

Customer Notification and Enrollment Process

Prior to launch of Westmoreland Community Power, all eligible customers will be mailed notifications and provided the opportunity to "opt-out" or "opt-in" to the program, depending on whether they currently are on default service provided by Eversource or take service from a Competitive Electric Power Supplier:

- Customers already served by Competitive Electric Power Suppliers will be notified and may request to "opt-in" to the program; and
- Customers currently on default energy service provided by Eversource will be notified, provided the opportunity to decline participation ("opt-out"), and thereafter transferred to Westmoreland Community Power if they do not opt-out.

Notifications to customers on utility-provided default service will include the initial fixed rate for the program's default service compared with the Eversource's rate, be mailed to customers at least 30 days in advance of program launch and provide instructions for customers to decline participation (for example, by return postcard, calling a phone number or using a web portal).

After the launch of Westmoreland Community Power, any new customers starting service within the Town will be given a similar opt-out notice and will be transferred onto default service provided by the program, unless they choose to take energy service from Eversource or a Competitive Electric Power Supplier.

All customers on Westmoreland Community Power default service will remain free to switch back to the Eversource or to take energy service from a Competitive Electric Power Supplier.

Customer Accounts and Electricity Usage Estimates

The tables below show the total number and annual electricity usage of customers within Westmoreland’s territory who would initially receive either “opt-out” or “opt-in” notifications:

<i>Aggregated data provided by Eversource for the 12 months ending March, 2023</i>						
Customer Type	<u>Utility Default Supply Customers</u> (Eligible for Opt-Out Notifications & Automatic Enrollment)		<u>Competitive Supply Customers</u> (Eligible for Opt-In Notifications & Voluntary Enrollment)		<u>Total Customers</u> (Combined Utility Default & Competitive Supply Customers)	
	Customer Accounts	Annual Usage (MWh)	Customer Accounts	Annual Usage (MWh)	Customer Accounts	Annual Usage (MWh)
Commercial	137	43	-	-	137	43
Outdoor Lighting	17	12	-	-	-	-
Residential	553	4,372	296	4,105	849	8,477
Total Y.E. 3/23	707	4,427	296	4,105	986	8,520

Aggregated data shown was provided by Eversource for the 12 months ending March 2023

Membership in the Community Power Coalition of New Hampshire

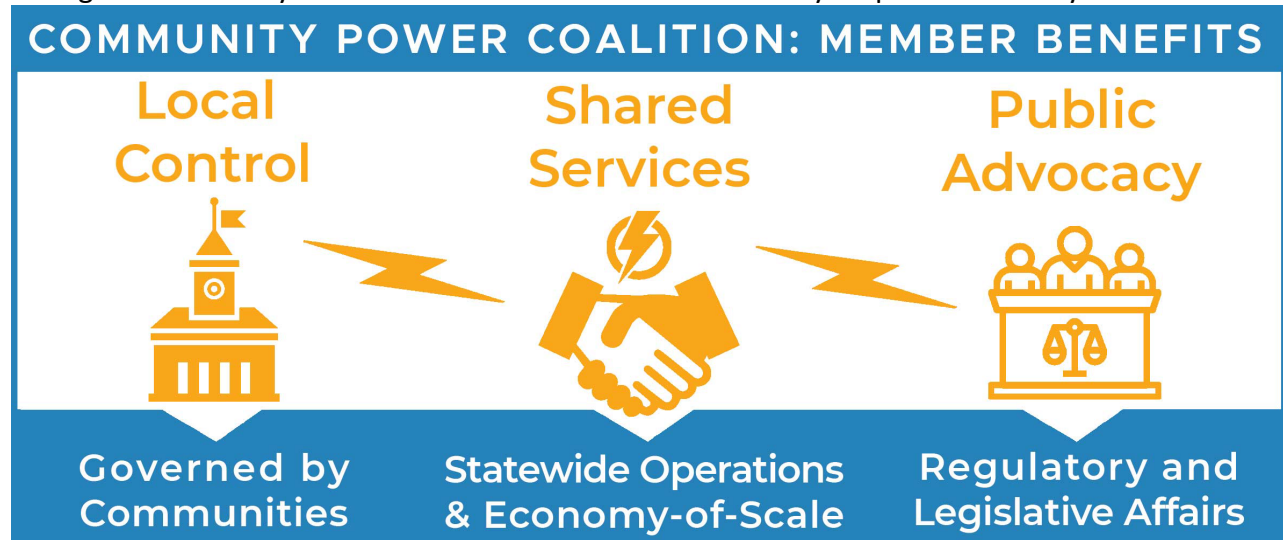
Westmoreland is a member of the [Community Power Coalition of New Hampshire](#) (“the Coalition”), a joint powers agency authorized under RSA 53-A (“*Agreements Between Governments: Joint Exercise of Powers*”) that will operate on a not-for-profit basis. The Coalition provides comprehensive services for authorizing, launching and operating Community Power programs.

The Coalition was created so that towns, cities, and counties across New Hampshire could:

1. Access the resources and support required to streamline the process of establishing an Electric Aggregation Committee, drafting an Electric Aggregation Plan and approving a new Community Power program.
2. Jointly solicit and contract for third-party services and staff support to launch and operate Community Power programs, without requiring any upfront costs or imposing any financial liabilities on participating communities.
3. Participate in joint power solicitations and local project development opportunities.
4. Share knowledge and collaborate regionally on clean energy and resilient infrastructure development at the community-level throughout the state.
5. Speak with one voice at the Legislature and Public Utilities Commission on public advocacy issues related to energy and Community Power.

The Coalition’s joint powers agency governance model and competitive business model have been designed in accordance with energy industry best practices to ensure that participating Community Power programs benefit from transparent governance and high-quality services —so that all communities are able to take full advantage of their local control authorities under RSA 53-E and achieve the full scope of their local energy policy goals.

The Coalition is governed “*for communities, by communities*” under a voluntary and flexible membership structure, will provide competitive electricity service on a statewide basis, and will strengthen the ability of communities to coordinate effectively on public advocacy issues.



Purpose of this Electric Aggregation Plan

The Westmoreland Community Power Advisory Committee (WCPAC) was tasked by the Board of Selectmen to prepare this Electric Aggregation Plan, which sets forth Westmoreland’s policy goals for our Community Power program, summarizes program governance and implementation processes, and commits Westmoreland Community Power to comply with applicable statutes and regulations in terms of:

- Providing universal access, reliability, and equitable treatment of all classes of customers subject to any differences arising from varying opportunities, tariffs, and arrangements between different electric distribution utilities in their respective franchise territories; and
- Meeting, at a minimum, the basic environmental and service standards established by the Public Utilities Commission and other applicable agencies and laws and rules concerning the provision of service under Community Power.

This plan does not otherwise commit Westmoreland to any defined course of action, including participation in the Coalition for the purposes of launching the program, and does not impose any financial commitment on the Town.

The Board of Selectmen retains the power to contract for all required program services and electricity supplies, to set rates, and to pursue related projects independently of the Coalition.

Approval Process for Westmoreland Community Power

This Electric Aggregation Plan was developed by the WCPAC with due input from the public, as required under RSA 53-E. Public hearings were held on 5 January 2023 and 9 February 2023. Refer to [Attachment 2](#) for additional information.

The WCPAC has determined that this Electric Aggregation Plan satisfies applicable statutory requirements and is in the best, long-term interest of the Town and its residents, businesses, and other ratepayers.

The Board of Selectmen may now submit this Plan for consideration by Town Meeting. Adoption of this Plan by the Town Meeting, by majority approval of those present and voting, establishes Westmoreland Community Power as an approved aggregation with statutory authorities defined under RSA 53-E:3 (to be exercised with due oversight and local governance, as described herein), and authorizes the Board of Selectmen to arrange and contract for the necessary professional services and power supplies to launch Westmoreland Community Power.

Implementation Process for the Coalition & Westmoreland Community Power

On 17 November 2022 the Westmoreland Board of Selectmen voted to enter into the Coalition's Joint Powers Agreement. The Coalition Board of Directors voted to welcome Westmoreland as a member on 15 December 2022.

The Coalition's Joint Powers Agreement includes the Articles of Agreement and Bylaws of the nonprofit. It establishes the general purpose, authorities, structure, Board of Directors, committees, cost-sharing principles, liability protections, and other aspects of the organization.

This plan assumes, but does not require, that the Town will participate fully in the Coalition for the purposes of implementing and operating Westmoreland Community Power.

The Board of Selectmen appoints primary and alternate representatives of Westmoreland Community Power to serve on the Coalition's Board of Directors and as Member representatives to Annual meetings and certain votes. The Town's representatives provide oversight to the Coalition's operations and finances and may participate on Committees of the Coalition.

Westmoreland and all other members will be directly represented on the Coalition's Board until more than twenty-one (21) members join, at which point directors will be elected by vote of the Members' representatives at annual meetings (with a Board size of between 11 and 21 representatives, at the Members' direction).

To exercise more regular oversight over specific aspects of the joint powers agency, the Coalition will have six standing committees as it develops: Executive, Finance, Audit, Regulatory and Legislative Affairs, Risk Management, and Governance. The Board may also establish ad-hoc committees, and each direct project that members choose to pursue in the future will be overseen by a committee specific to that project.

All meetings of the Coalition will comply with New Hampshire's Right-to-Know Law (RSA 91-A), the purpose of which is to *"ensure both the greatest possible public access to the actions, discussions and records of all public bodies, and their accountability to the people"*, based on the recognition that *"openness in the conduct of public business is essential to a democratic society."*

Development of Member Cost Sharing Agreement and Services for Westmoreland Community Power

Under the terms of New Hampshire's Community Power law ([RSA 53-E](#)):

- Community Power programs must be self-funded, with ongoing costs paid for using the revenues generated by participating customers.
- Municipalities are only allowed to incur incidental costs associated with implementing Community Power programs, such as the costs necessary to comply with the Community Power

law, up to the time that the program starts to produce revenue from participating customers. Incidental costs should not include any costs that are more properly accounted for as capitalized or operating costs of the Westmoreland Community Power program.

Membership in the Coalition, and the implementation of Westmoreland Community Power, will not require any upfront cost for the Town other than such incidental expenses (e.g., the staff time, counsel review of agreements, and other expenses required to comply with the Community Power law before the program starts to generate revenue).

To provide the services, credit support and electricity supply required to launch and operate Westmoreland Community Power:

- The Coalition will administer competitive solicitations on behalf of all participating Community Power programs to contract with qualified vendors and credit-worthy suppliers.
- Vendors are expected to fund and self-manage the upfront cost of launching Community Power programs, under at-risk and performance-based contract structures with payments contingent upon successful launch.
- Program implementation costs for Westmoreland, along with ongoing operational and power procurement expenses, will be factored into the customer rates and be recovered from the revenues received from participating customers after the launch of Westmoreland Community Power.

The Coalition's Joint Powers Agreement provides certain requirements regarding how costs will be tracked and shared across participating Community Power programs, which will guide the development of the Coalition cost-sharing agreement:

- Costs will be tracked in three distinct categories: direct project costs, member services, and general and administrative costs (which are overhead costs that are not associated with any specific project or member service);
- Member cost-sharing agreements will be the same in all material respects: general and administrative costs will be allocated based on each Community Power program's share of total electricity usage each year, while each member will choose and separately pay for the costs of specific services and projects (under terms that reflect a fair allocation across all the members that chose the same services and projects); and
- The debts, liabilities and obligations of the Coalition, and of other participating Community Power programs, will be non-recourse to Westmoreland (unless expressly agreed to by the Board of Selectmen under Westmoreland's Cost Sharing Agreement or a Project Contract).

To proceed with launching and operating Westmoreland Community Power through the Coalition:

- The Board of Selectmen would review and approve execution of the Coalition's Cost Sharing Agreement and Member Services Contract, along with the Data Security and Privacy Policy and the Energy Portfolio Risk Management, Retail Rates, and Financial Reserves policies approved by the Coalition's Board of Directors.
- The Coalition would provide the services and credit support necessary to launch and operate Westmoreland Community Power (along with the programs of other municipalities across the state) and would provide all-requirements electricity to customers participating in the programs.

- Confidential customer data would be handled in accordance with the Data Security and Privacy Policy.
- Power procurement and energy portfolio risk management, rate setting, and the accrual of financial reserves for the program would be carried out in accordance with the Coalition's Energy Portfolio Risk Management, Retail Rates, and Financial Reserves policies.
- The Coalition would collect revenues from program customers on the Town's behalf and would recover expenses incurred on behalf of Westmoreland Community Power in accordance with the Cost Sharing Agreement.

Governance of the power agency would be carried out pursuant to the Coalition's Joint Powers Agreement. The Board of Directors and committees of Member Representatives — the Executive Committee, Finance Committee, Risk Management Committee, Member Operations and Engagement Committee, Regulatory and Legislative Affairs Committee, etc. — would continue to meet regularly and carry out their responsibilities to provide oversight and direction, supported by a qualified CEO and staff experts hired to provide day-to-day oversight and management the agency's service providers, operations, planning, and program development activities.

The Coalition intends to contract for all the services required to launch and operate member Community Power programs, which is expected to enable access to advanced services and expertise at least cost for Westmoreland Community Power. However, note that:

- The Town will be under no obligation to rely on the services provided through the Coalition until the Board of Selectmen executes the Coalition's cost-sharing agreement and chooses which services will be provided through the Coalition.
- At that time, the Board of Selectmen may decide to rely on the Coalition for all or a subset of the services required to launch and operate Westmoreland Community Power.
- Alternatively, the Board of Selectmen could decide to withdraw from the Coalition entirely, prior to the point at which power procurement is authorized on behalf of Westmoreland Community Power without any cost or continuing financial obligations to the Coalition, and launch Westmoreland Community Power independently.
- Lastly, after Westmoreland Community Power launches, the Town could still decide to procure certain services independently or to withdraw from the Coalition at a future date, subject to the terms, conditions and any continuing obligations specified in the cost-sharing agreement approved by the Board of Selectmen.

Decisions made by the Board of Selectmen regarding how to best implement and operate Westmoreland Community Power, including the execution of the Coalition cost-sharing agreement and selection of services provided through the Coalition, will be made at duly noticed public meetings.

Energy Risk Management & Financial Reserve Policies

Westmoreland Community Power's ability to maintain competitive rates, as market prices and Eversource default rates change over time, is a primary goal for the program. Competitive rates will significantly reduce the risk that customers opt-out of Westmoreland Community Power and allow the program to achieve our medium- to long-term goals.

To that end, working with the other members of the Coalition, Westmoreland Community Power will adopt Energy Risk Management and Financial Reserve policies. The purpose of these policies is to:

- Ensure that Westmoreland Community Power allocates customer revenues in ways that balance our community's goals and objectives over the short-to-long term; and
- Define how the Coalition will conduct energy risk management, procurement and market operations on behalf of Westmoreland Community Power (so that the agency remains in compliance with our adopted policies).

Westmoreland Community Power's power procurement, budgeting and rate-setting will be carried out in accordance with the Energy Risk Management Policy and Financial Reserve Policies that will be adopted by the Board of Selectmen.

Electric Aggregation Plan Submission to the Public Utility Commission

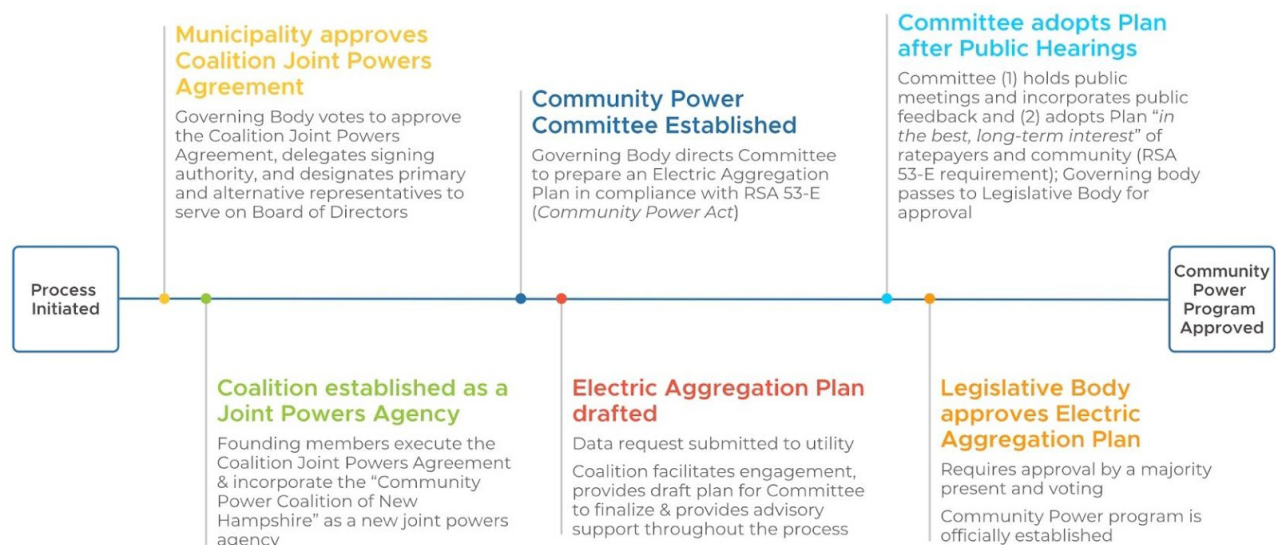
Westmoreland will submit this final Electric Aggregation Plan to the Public Utilities Commission for review and approval as per RSA 53-E:7, II.

Coalition & Westmoreland Community Power Implementation Milestone Charts

The milestone charts below show the anticipated approval, formation and launch processes for Westmoreland Community Power and the Coalition power agency, as described in the sections above.

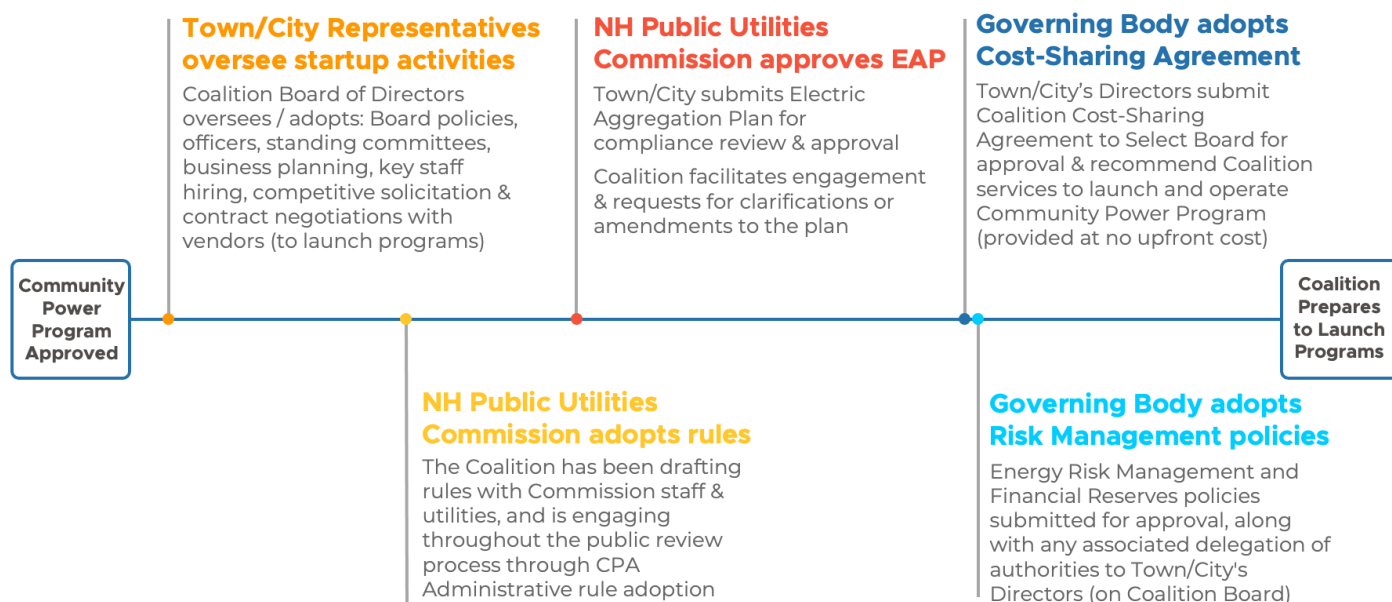
The first chart below summarizes the different categories of activities required to approve Westmoreland Community Power and join the Coalition as a member:

Approval Process for Coalition Agency & Westmoreland Community Power



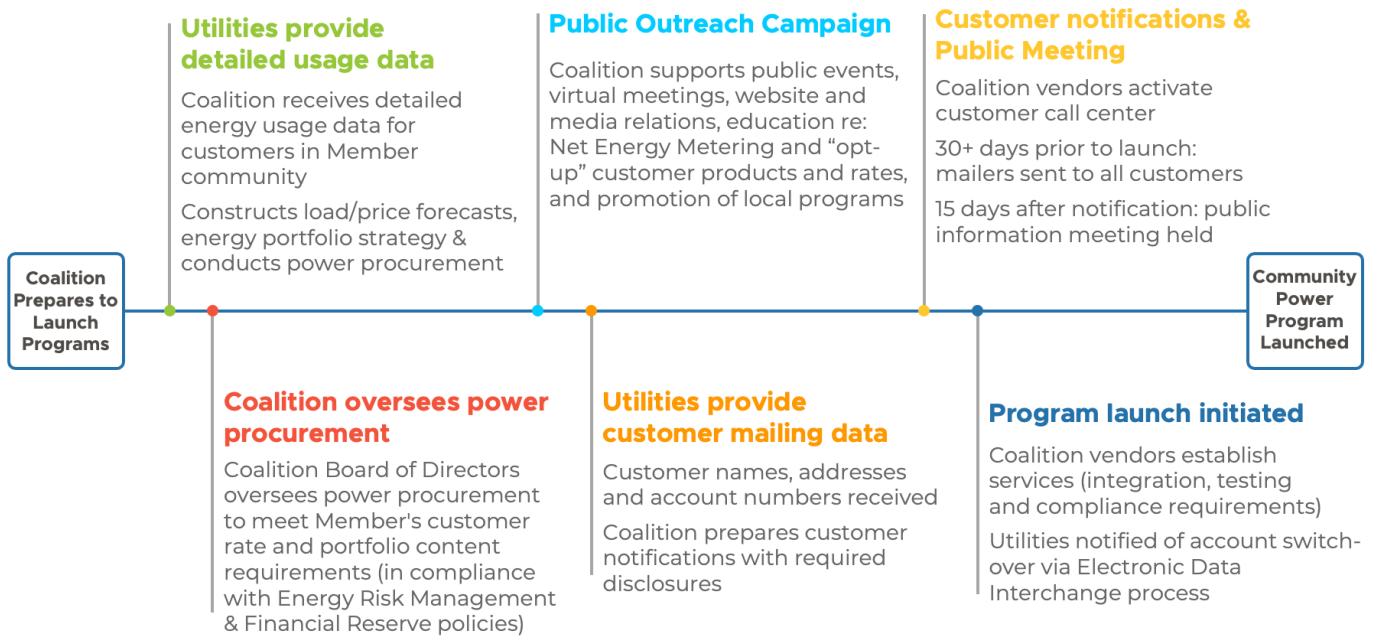
Coalition Startup, Rule Making and Risk Management Policy Approval Process

The milestones chart below summarizes the Coalition startup, PUC approval, and Board of Selectmen adoption of key agreements and policies required for program launch:



Westmoreland Community Power Launch Process

The milestones below summarize the process by which the Coalition will structure and conduct data collection, forecasting, power procurement solicitations and rate setting exercises — in compliance with the Energy Risk Management and Financial Reserve policies adopted by the Town, and with oversight provided by Westmoreland’s representatives on the Coalition’s Board of Directors — and the local outreach, customer notification mailings and public meeting process that culminates in the launch of Westmoreland Community Power:



Westmoreland Community Power Goals, Objectives, and Requirements

Westmoreland Community Power affords the Town the capacity and flexibility to realize and build on our policies pertaining to energy, economic development, and infrastructure.

Our policy goals will need to be pursued through a combination of direct program activities and informed public advocacy at the Legislature and Public Utilities Commission. This will require enhanced coordination with other communities as well as advanced operational services, dedicated expertise, innovation, and sustained initiative carried out over a period of multiple years.

Simultaneously, maintaining competitive rates compared to Eversource’s default service rates — as market prices, energy technologies and policies change over time — will require nimble decision-making and the ability to evolve business operations in response to changing market conditions to actively manage risk, minimize costs and maximize the creation of customer value.

The structure of the Coalition — the combination of the joint powers agency’s community governance model, competitive business model and coordinated approach to engaging in public advocacy — has been designed to enable and streamline these activities for Westmoreland Community Power at an advantageous, cost-effective economy-of-scale.

Participation in the Coalition is therefore expected to strengthen the capacity and financial performance of Westmoreland Community Power, such that the program can operate continuously as a self-supporting, competitive enterprise for the foreseeable future, and will therefore be able to work towards achieving the full scope of our policy goals and objectives over the long-term.

Westmoreland's Policy Goals

The overall goal of community power aggregation is to harness the power of competitive markets and community-scale purchasing of electricity to reduce costs, increase supply options, enable greater customer choice, and provide services to enhance the lives of customers.

Refer to [Attachment 3](#) for additional select excerpts of these policies and links to more detail.

Westmoreland Community Power Objectives

To achieve our policy goals, Westmoreland Community Power will be guided by the following objectives:

- **Competitive Rates:** provide residential default rates that are lower than or competitive with those offered by Eversource;
- **Expanded Choices and Enhanced Customer Focus:** offer optional products, such as supply options with higher and lower levels of renewable energy and time-varying rates that enable the intelligent use of customer energy technologies to reduce energy expenditures and carbon emissions on a voluntary basis;
- **Fiscal Stability & Financial Reserves:** maintain a reserve fund to ensure that the program remains able to offer competitive rates as market prices fluctuate over time;
- **Consumer Protections:** ensure that the contracts entered into on behalf of customers are fair and represent the interests of Westmoreland and its residents;
- **Public Advocacy:** represent the interests of Westmoreland and the program's customers at the Legislature, Public Utility Commission and other relevant agencies on matters pertaining to Community Power and towards creating a more modern electric grid;
- **Cleaner, Local Power:** prioritize the development of cost-effective projects to supply an affordable energy portfolio that prioritizes the use of in-state and local renewable energy;
- **Community Resilience:** support local contractor training and education programs to lower barriers to the installation of new clean energy technologies, and support projects such as back-up power supplies, electric vehicle charging networks and community microgrids on critical facilities;
- **Regional Collaborations:** collaborate with municipalities, other Community Power programs and government agencies to jointly develop cost-effective local renewable generation and storage projects, electric vehicle transit fleets and charging corridors, and other clean energy infrastructure developments.

Through strategies and initiatives like these, enabled by the scope and scale of service provided through the Coalition, Westmoreland Community Power intends to:

- Create savings and new value for customers;
- Support the vitality and growth of local businesses and;
- Reduce fossil fuel consumption overall while enhancing the reliability of our electricity grid.

These objectives are essential to our continued success as a vital, sustainable community.

Near-Term Operational Requirements

While many of the broader benefits Westmoreland Community Power intends to create for customers and the Town will be developed over time, the program's immediate objective is to offer competitive default supply rates compared to Eversource while accruing a reserve fund sufficient to ensure long-term financial stability, and additionally offering voluntary products that retail customers may opt-up to receive as well as Net Energy Metering supply rates that allow customer generators to participate in the program.

Westmoreland Community Power will need to balance customer rate levels, renewable power content and the accrual of program reserves to meet these objectives.

Performance Relative to Utility Default Service and Net Energy Metering Generation Rates

Compensation to customer generators under Net Energy Metering generation rates, the timing of the program's rate setting decisions and, to a certain degree, the procurement of electricity will need to take into account Eversource' tariffs, processes and timing in regard to these activities. Refer to [Attachment 1](#) for additional documentation and discussion of these factors.

Customer Rates and Products

The table below provides an illustrative example of a default service product and optional rates that could be offered to customers:

<u>PRODUCT</u>	<u>CONTENT</u>	<u>MEMBER ELECTIONS</u>
Granite Basic	Minimum RPS Content (23.4%)	Default, opt-down/in, or N/A
Granite Plus	33% Renewable or Carbon Free	Default, opt-up/in, or N/A
Clean 50	50% Renewable or Carbon Free	Opt-up/in or N/A
Clean 100	100% Renewable or Carbon Free	Opt-up/in or N/A

The products that Westmoreland Community Power initially offers to customers, and the rates charged for each product, will be refined and finalized in advance of program launch.

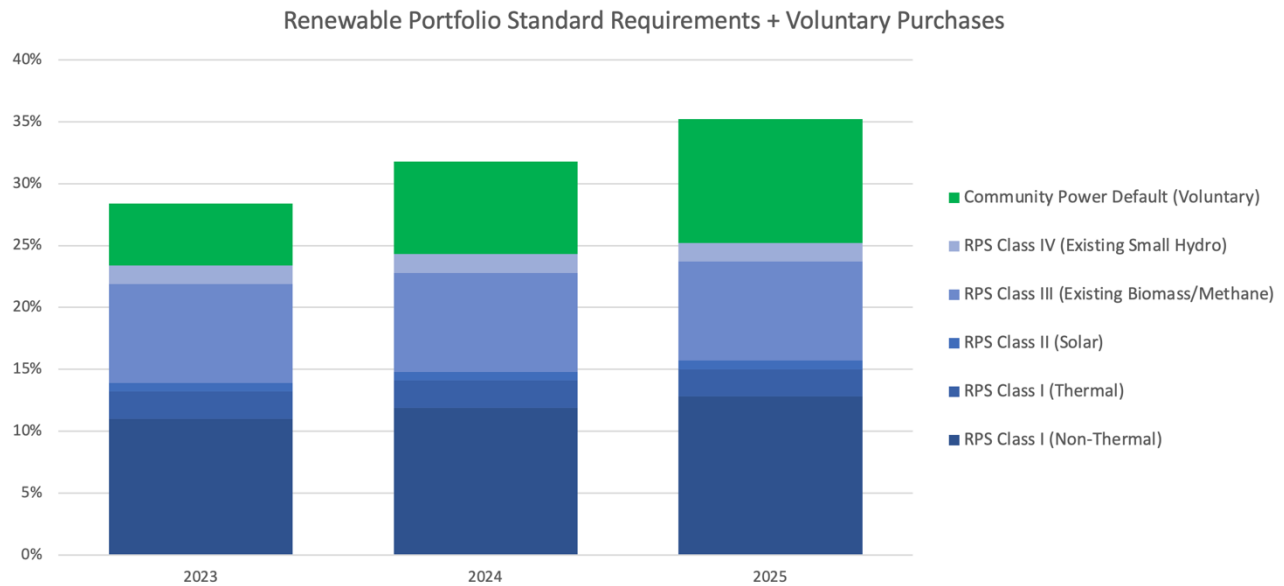
Renewable Portfolio Standard Requirements

New Hampshire's Renewable Portfolio Standard (RPS) requires all electricity suppliers to obtain RECs for four distinct "classes" of renewables, each distinguishing between different technologies and dependent upon the year that the generators came online.

For 2022, Eversource and other electricity suppliers are required to include 22.5% renewable energy in their energy supply. This minimum compliance requirement will increase incrementally to 25.2% by 2025 and remain fixed thereafter, absent an increase in the RPS.

Westmoreland Community Power will seek to procure voluntary renewables in excess of the RPS minimum requirements from “Class I” resources (as defined at <https://www.cpcnh.org/renewable-portfolio-standard>). Additionally, the program could prioritize including as much renewable energy sourced from generating resources located in New Hampshire and New England as possible.

The chart below shows the different classes and quantities of renewable power required under the RPS between 2023 and 2025, along with, for the sake of illustration, Westmoreland Community Power’s additional voluntary purchases (assuming that the default product from the table in the proceeding section, which exceeds RPS requirements by 5% to 10% each year):



ELECTRIC AGGREGATION PLAN STATUTORY REQUIREMENTS

The following requirements for this Electric Aggregation Plan, in compliance with RSA 53-E:6, are addressed below:

- A. Organizational structure of the program;
- B. Methods of entering into and terminating agreements;
- C. Operation and funding;
- D. Rate setting, costs, and customer enrollment process;
- E. Rights and responsibilities of program participants;
- F. Net metering and group net metering policies;
- G. Ensuring discounts for Electric Assistance Program participants; and,
- H. Termination of program.

Organizational Structure of the Program

Upon approval of this plan, Westmoreland Community Power will be authorized to provide electricity and other related services to participating residents, businesses, and other customers in the Town.

The Board of Selectmen will oversee the program and has overall governance authority. Decisions regarding Westmoreland Community Power, such as updating program goals, adoption of Energy Portfolio Risk Management, Retail Rates, and Financial Reserve policies (to govern the program's power procurement and rate-setting decisions), will be made at duly noticed public meetings and with advisory support from the Westmoreland Community Power Advisory Committee.

The Board of Selectmen has appointed a primary and alternate representative to participate in the Community Power Coalition of New Hampshire and to serve on the agency's Board of Directors and may delegate certain decision-making authorities to them to carry out their responsibilities at the Board of Selectmen's direction.

In general, Westmoreland's representatives will be expected to help oversee the start-up and operation of the agency, provide input regarding the Coalition's public advocacy on matters of policy and regulation, provide direction to the Coalition's staff and vendors as the agency's operations and customer services evolve over time, and report back regularly regarding the performance of Westmoreland Community Power and on any matter that warrants attention or requires action by the Board of Selectmen.

Additionally, the Board of Selectmen may direct the Westmoreland Community Power Advisory Committee to continue to hold meetings for the purpose of providing community input and advisory support regarding the program.

Methods of Entering into and Terminating Agreements

This Electric Aggregation Plan authorizes the Board of Selectmen to negotiate, enter into, modify, enforce, and terminate agreements as necessary for the implementation and operation of Westmoreland Community Power.

Operation and Funding

Westmoreland Community Power will contract with qualified vendors and credit-worthy suppliers to provide the services, credit support and electricity required to launch and operate the program.

This plan assumes, but does not require, Westmoreland to participate fully in the Coalition and thereby contract for operational services jointly with other participating Community Power programs.

The Coalition's third-party contractors will be expected to fund the upfront cost of implementing Westmoreland Community Power, the expense of which will be amortized and recovered in the program's rates and charges to participating customers. The program may also seek opportunities to apply for grant funding, either independently or through the Coalition.

Services provided by third-party entities required to launch and operate the program may include portfolio risk management advisory services, wholesale Load Serving Entity (LSE) services, financial services, electronic data interchange (EDI) services with the utility, and customer notification, data management, billing, and relationship management (e.g., call center, website, etc.) services. Additional information on how Westmoreland Community Power will implement Load Serving Entity (LSE) services is found in [Attachment 4, How Load Serving Entity Services will be Implemented](#).

Additional support services such as management and planning, budgeting and rate setting, local project development support, regulatory compliance, and legislative and regulatory engagement services (on matters that could impact the program and participating customers) will be addressed through a combination of staff support and third-party services.

Westmoreland Community Power will provide "all-requirements" electricity supply for its customers, inclusive of all of the electrical energy, capacity, reserves, ancillary services, transmission services (to the extent not provided through Eversource), transmission and distribution losses, congestion management, and other such services or products necessary to provide firm power supply to participants and meet the requirements of New Hampshire's Renewable Portfolio Standard. (Refer to <https://www.cpcnh.org/renewable-portfolio-standard> for details regarding the requirements of Renewable Portfolio Standard statute, RSA 362-F.)

If a single supplier is relied upon to provide all-requirements electricity on behalf of Westmoreland Community Power, then (1) the supply contract will be executed or guaranteed by entities that possess at least a BBB- or equivalent investment-grade rating issued by a nationally recognized statistical rating organization (NRSRO), and (2) the supplier will be required to use proper standards of management and operations, maintain sufficient insurance, and meet appropriate performance requirements for the duration of the supply contract. Alternatively, if a portfolio of contracts with multiple entities is structured to diversify counterparty credit risk exposure, and actively managed to provide for all-requirements electricity on behalf of Westmoreland Community Power, then counterparty credit requirements and monitoring, hedging transaction authorities, residual ISO-NE market exposure limits, and reporting requirements will be carried out in accordance with Energy Portfolio Risk Management, Rates, and Financial Reserves policies that would be established prior to commencing procurement and implementing the program.

Additionally, RSA 53-E provides Community Power programs with authorities pertaining to meter ownership, meter reading, billing, and other related services. These authorities provide Westmoreland Community Power with the practical ability to help customers adopt and use innovative technologies (for example, building management systems, smart thermostats, backup

battery storage systems, controllable electric vehicle chargers, etc.) in ways that save money, enhance grid resiliency, and decarbonize our power supply.

However, the implementation of these authorities is expected to take some time, as it requires action by the Public Utilities Commission to adopt enabling rules and coordination with Eversource to adapt existing meter and billing system processes.

Rate Setting, Costs, Enrollment Process, and Options

Customers who choose not to participate in Westmoreland Community Power shall not be responsible for any costs associated with the program, apart from incidental costs incurred by the Town prior to the point at which the program starts producing revenue from participating customers (for example, contract review by legal counsel, but not any operational or capitalized costs of the program).

Rate Setting and Costs

Westmoreland Community Power will only launch if it is able to offer residential default rates that are initially lower than or competitive with those offered by Eversource; thereafter, the program will strive to maintain competitive rates for all default service customers on an overall annual basis, as well as customers who opt-in or opt-up to receive optional retail products, while working to achieve the program's goals (as set forth in this Electric Aggregation Plan and modified from time to time at the direction of the Board of Selectmen).

The Board of Selectmen will adopt Energy Risk Management and Financial Reserve policies to govern the program's power procurement and rate-setting decisions. Rates will be set at a level such that revenues from participating customers are projected to meet or exceed the ongoing operating and capital costs of the program.

To ensure the financial stability of Westmoreland Community Power, a portion of revenues will be deposited in a financial reserve account. In general, the fund will be restricted for uses such as:

- **In the near-term**, maintain competitive customer rates in the context of price fluctuations in the electricity market and other factors;
- **In the medium term**, as collateral for power purchase agreements (including for the development of new renewable and battery storage projects), and for additional credit enhancements and purposes that lower the program's cost of service; and
- **Over the long term**, may also be used to directly fund other program financial requirements, or to augment the financing for development of new projects and programs in the later years of the program, subject to the Board of Selectmen's approval.

As required by law, the program will ensure the equitable treatment of all classes of customers, subject to any differences arising from varying opportunities, tariffs, and arrangements between different electric distribution utilities in their respective franchise territories.

In other words, customers will be treated the same based on their circumstances. For example, any customers that opt-in after being offered the opportunity to participate during the initial enrollment period may be offered rates that reflect how market prices have changed in the intervening period.

Changes to the program's default service rates shall be set and publicly noticed at least 30 days in advance of any rate change.

Enrollment Process and Options

Westmoreland Community Power intends to launch on an opt-out basis, providing an alternative default service to the utility provided default service rate. After approval of this Electric Aggregation Plan and before the launch of Westmoreland Community Power, all customers in the Town will be sent notifications regarding the program and offered the opportunity to participate:

- **Customers currently on default service provided by Eversource** will be sent “opt-out” notifications — describing the program, its implications for the Town, the rights and responsibilities of customers, and program rates and charges — with instructions on how to decline participation, and thereafter be transferred to Westmoreland Community Power if they do not opt-out of the program prior to launch.
- **Customers already served by Competitive Electric Power Suppliers** will receive “opt-in” notifications describing the program and may request to opt-in to the program.

If the electric distribution utilities have not fully implemented Public Utilities Commission rules and procedures governing Community Power Aggregation service, certain groups of customers on default service provided by the utilities may need to be offered service on an opt-in basis, and/or offered service on an opt-out basis at a future date. For example, if the utilities are unable to reliably provide the data on customer-generators necessary to offer Net Energy Metering (NEM) rates and terms, then the program may initially choose to not enroll customer-generators on an opt-out basis, as doing so could risk negatively impacting NEM customer billing and crediting procedures.

Customers will be notified through a mailing, which will be posted not less than 30 days prior to the enrollment of any customers. All information will be repeated and posted at the Town’s Community Power website. A public information meeting will be held within 15 days of the notification to answer program questions or provide clarification.

Optional products, such as increased renewable power content in excess of the Renewable Portfolio Standard (RPS) requirements and other energy services, including time varying rates, may be offered on an opt-in basis.

After launch and in accordance with any applicable rules and procedures established by the Public Utilities Commission, new customers will be provided with the default service rates of Eversource and Westmoreland Community Power and will be transferred onto Westmoreland Community Power’s default service unless they choose to be served by Eversource or a Competitive Electric Power Supplier.

Customers that request to opt-in to the program may do so at the discretion and subject to the terms of Westmoreland Community Power.

Residents, businesses, and other electricity customers may opt-out of participating in Westmoreland Community Power default service at any time, by submitting adequate notice in advance of the next regular meter reading by Eversource (in the same manner as if they were on utility provided default service or as approved by the Public Utilities Commission).

Customers that have opted-in to an optional product offered by Westmoreland Community Power may switch back to the Eversource or to take service from a Competitive Electric Power Supplier subject to any terms and conditions of the optional product.

Rights and Responsibilities of Program Participants

All participants will have available to them the customer protection provisions of the law and regulations of New Hampshire, including the right to question billing and service quality practices.

Customers will be able to ask questions of and register complaints with the Town, Eversource and the Public Utilities Commission.

Westmoreland Community Power shall maintain the confidentiality of individual customer data in compliance with its obligations as a service provider under [RSA 363:38](#) (privacy policies for individual customer data; duties and responsibilities of service providers) and other applicable statutes and Public Utilities Commission rules. Individual customer data includes information that singly or in combination can identify that specific customer including the individual customers' name, service address, billing address, telephone number, account number, payment information, and electricity consumption data. Such individual customer data will not be subject to public disclosure under RSA 91-A (access to governmental records and meetings). Suppliers and vendors for Westmoreland Community Power will be contractually required to maintain the confidentiality of individual customer data pursuant to RSA 363:38, V(b). [Attachment 5, Customer Data Protection Plan](#), details the reasonable security procedures and practices that the Town and Westmoreland Community Power will employ to protect individual customer data from unauthorized access, use, destruction, modification, or disclosure.

Aggregate or anonymized data that does not compromise confidentiality of individual customers may be released at the discretion of Westmoreland Community Power and as required by law or regulation.

Participants will continue to be responsible for paying their bills. Failure to do so may result in a customer being transferred from Westmoreland Community Power back to Eversource (the regulated distribution utility and provider of last resort) for default energy service, payment collections and utility shut offs under procedures subject to oversight by the Public Utilities Commission.

Net Metering and Group Net Metering Policies

Under the net metering process, customers who install renewable generation or qualifying combined heat and power systems up to 1,000 kilowatts in size are eligible to receive credit or compensation for any electricity generated onsite in excess of their onsite usage.

Any surplus generation produced by these systems flows back into the distribution grid and offsets the electricity that would otherwise have to be purchased from the regional wholesale market to serve other customers.

Currently, customer-generators are charged their full retail rate for electricity supplied by Eversource and receive credits for electricity they export to the grid based on Eversource' Net Energy Metering (NEM) tariffs.

Westmoreland Community Power intends to provide new rates and terms that compensate participating customer-generators for the electricity supply component of their net metered surplus generation.

Customer-generators will continue to receive any non-supply related components (e.g., transmission and distribution credits) directly from Eversource, as specified under the terms of their applicable net energy metering tariff.

For group net metering where the host customer-generator is on default service, to the extent Westmoreland Community Power supply rates are lower than Eversource default service or if the host is located outside of Westmoreland, it may be most advantageous for the host to remain a Eversource default service customer, while the other group members are free to switch to Westmoreland Community Power for their supply and continue to receive on-bill credits for their participation in the group.

Westmoreland Community Power's exact terms, conditions, and rates for compensating and crediting different types of NEM customer generators in the Town will be set at duly noticed public meetings and fully disclosed to all prospective NEM customers through the program's enrollment notification process and thereafter.

Certain aspects of administering net energy metering require coordination between Eversource and Westmoreland Community Power. The enabling services and strategies that Westmoreland Community Power may pursue, to benefit and encourage customers to adopt distributed generation, include but are not limited to:

- Dual-billing customer-generators separately for supply services;
- Offering time-varying rates and alternative credit mechanisms to compensate customers for surplus generation;
- Streamlining the establishment of new Group Net Metering and Low-Moderate Income Solar Project groups;
- Facilitating interval meter and Renewable Energy Certificate (REC) meter installations for customer-generators; and
- Engaging at the Legislature and Public Utilities Commission to advocate for upgrades and reforms to metering and billing infrastructure and business processes to enable Net Energy Metering and other innovative services to benefit customer-generators.

For additional details regarding these enabling services and strategies, refer to:

- [Attachment 1](#) provides an in-depth discussion regarding operational and strategic opportunities to enhance net metering and group net metering through Westmoreland Community Power.

Ensuring Discounts for Electric Assistance Program Participants

Income eligible households can qualify for discounts on their electric bills under the Electric Assistance Program. Westmoreland Community Power will support income eligible customers who enroll in the Electric Assistance Program to receive their discount.

Electric Assistance Program discounts are funded by all ratepayers as part of the System Benefits Charge, which is charged to all customers and collected by the distribution utilities.

At present, the Public Utilities Commission and utilities only support provision of the discount to individual customers when the customer's electricity supply charges are billed through the distribution utility.

Westmoreland Community Power consequently plans to rely on Eversource to bill all customer accounts enrolled in the Electric Assistance Program. This represents no change in the provision or funding of this program.

This arrangement may be revisited if, at some point in future, the Public Utilities Commission enables Community Power programs to provide Electric Assistance Program customers with their discount directly.

Termination of the Program

There is no planned termination date for Westmoreland Community Power.

Westmoreland Community Power may be terminated by majority approval of the Board of Selectmen. If so terminated, Westmoreland Community Power would cease operations after satisfying any obligations contractually entered into prior to termination, and after meeting any advance notification period or other applicable requirements in statute or regulation, at which point participating customers would either be transferred to default service provided by Eversource or to a Competitive Electric Power Supplier of their choosing.

Westmoreland Community Power will provide as much advance notice as possible regarding the potential or planned termination of the program to participating customers, the Coalition, the Public Utilities Commission and Eversource.

Upon termination, the balance of any funds accrued in the program's financial reserve fund and other accounts, if any, would be available for distribution or application as directed by the Board of Selectmen and in accordance with any applicable law and regulation.