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July 13, 2023

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 23-069 Request for Approval of Derry 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 Derry Community Power Electric Aggregation Plan (“the Aggregation Plan”) filed by the Town of Derry in this docket on July 6, 2023, consistent with the requirement of RSA 53-E:7, 11 and the July 10, 2023 Order of Notice in this docket requiring 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 983 accounts in the Town of Derry.

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.

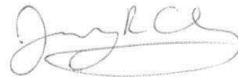
As a result, the Cooperative was granted a Waiver of Portions of Puc 2200 Rules. The Cooperative has also filed a Purchase of Receivables program which is currently pending before the Commission in docket DE 23-001.

NHEC notes that the Aggregation Plan appears to use consolidated billing for all accounts. Net metering consolidated billing rate designs are subject to limitations with the current New Hampshire EDI standard.

Assuming adherence to the current EDI standard, billing and metering system limitations, and realistic deployment timelines, the Cooperative does not have any significant concerns with Derry's plan.

If you have any questions, please do not hesitate to contact me at clarkj@nhec.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Clark", with a stylized flourish at the end.

Jeremy Clark
Financial Planning, Analysis, and Rates Manager

cc: Service List