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July 27, 2018

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: DE 16-576, Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators Request for Extension of Deadline to File Locational Study Design Report

Dear Ms. Howland:

Pursuant to Order No. 26,124 (April 30, 2018), the Commission directed that parties and Staff focus on determination of the locational value of distributed generation (DG) to the utility distribution system through study and analysis of relevant data, rather than through development and implementation of non-wires alternative pilot programs. The Commission directed parties in the working group process to evaluate alternative study designs and methodologies to address the potential locational value of DG on the utility distribution system, and it encouraged Staff to “leverage the resources and expertise available through the [Clean Energy States Alliance – National Renewable Energy Laboratory (CESA-NREL)] research initiative” to develop the scope and data requirements for the locational value study. The Commission stated that the analysis of locational value “might be addressed either through a separate study or within the scope of the Value of DER study, depending on which approach is determined to be most effective and efficient.” Under Order No. 26,124, Staff is required to file a report containing the proposed scope and timeline for the distribution-level locational DG valuation study within three months of the date of the order.

The parties and Staff met in a working group session on June 21, 2018 and discussed issues related to distribution-level locational DG value analysis, as well as the status of the Commission’s participation in the CESA-NREL research initiative. Staff indicated its expectation that, through its participation in that initiative, representatives from NREL would be available to provide guidance and research to Staff with respect to locational value study methodology approaches and related data requirements. It was the general consensus of working group participants that the study design development process would benefit from NREL’s input. After the working group session, Staff worked with CESA-NREL to develop specific assistance requests and to obtain Governor and Executive Council approval of the memorandum of understanding (MOU) between the Commission and CESA. In support of this study, NREL will

present relevant background information in August 2018 and attend a working group session in September 2018 to provide guidance with respect to study methodology approaches and related data requirements. Given the timing of approval of the MOU, it would be beneficial for the working group process schedule to be extended to accommodate the anticipated input from NREL.

The working group participants also have discussed, but have not yet resolved, the question whether the locational value study should be conducted separately or as a part of the Value of DER study. It is generally recognized, however, that the Value of DER study must include the results of the distribution-level locational DG valuation analysis as an essential input, regardless of whether that analysis is performed separately or in conjunction with the Value of DER study.

Staff, on behalf of the parties, therefore requests that the deadline for submission of the report containing the proposed scope and timeline for the distribution-level locational DG valuation study be extended for three months, until October 30, 2018.

I hereby certify that a copy of this letter will be served electronically on the parties on the service list at the same time it is filed with the Commission.

Sincerely,



David K. Wiesner
Staff Attorney

cc: Service List

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

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b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.

c) Serve a written copy on each person on the service list not able to receive electronic mail.

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