

THE STATE OF NEW HAMPSHIRE

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Martin P. Honigberg

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Kathryn M. Bailey
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Debra A. Howland



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:
www.puc.nh.gov

November 30, 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 Locational Value of Distributed Generation Study Scope and Timeline

Dear Ms. Howland:

Please find enclosed for filing an original and six copies of Commission Staff's proposed Locational Value of Distributed Generation (LVDG) Study Scope and Timeline. This filing is submitted pursuant to Order No. 26,124 (April 30, 2018) at 16-17, which required that "a report containing the proposed scope and timeline for the [LVDG] study be filed by Staff ... for review and approval by the Commission prior to the engagement of a consultant to perform the study."

As contemplated by that Order, Commission Staff has developed the proposed study scope and timeline through an extensive stakeholder development process that included a series of working group sessions convened by the Commission. *Id.* at 15-16. The Order directed that stakeholders should consider the potential merits of the *Location Specific Avoided Transmission and Distribution Avoided Costs Using Probabilistic Forecasting and Planning Methods* performed in 2016 by Nexant, Inc. for Central Hudson Gas & Electric (the Nexant Study), as well as other relevant studies and analyses. *Id.*

During the working group process, detailed discussions of study scope alternatives occurred, in addition to the exchange of informative and educational materials. At one session, the stakeholders received a presentation made by a representative of the U.S. Department of Energy's National Renewable Energy Laboratory (NREL).

Staff proposed for stakeholder consideration two different approaches to the LVDG study: one based on the Nexant Study and the other based on current utility distribution system planning processes and load forecasting. It was the general consensus of working group participants that the utility-focused approach was preferable to one based on the Nexant Study, and that preferred approach is reflected in the proposed study scope and timeline.

Most recently, Staff circulated a draft of the study scope and timeline similar to that submitted herewith, and received written comments from a number of stakeholders raising issues and proposing revisions. Certain changes based on that stakeholder input have been incorporated in the final proposed study scope and timeline.

Finally, the Office of Consumer Advocate in its comments recommended that the study scope development process be extended for a period of time so that additional discovery could be undertaken regarding the details of the marginal cost of service study (MCOS Study) submitted on July 16, 2018 by Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource). Staff does not believe that such additional discovery is necessary before the proposed study scope is reviewed and approved. As noted in the proposed study scope and timeline, the consultant performing the LVDG study will review relevant documents to identify locations for study, including, but not limited to, utility marginal cost of service studies such as the Eversource MCOS Study. And the proposed study scope and timeline further provides that the study consultant and Staff will hold periodic stakeholder working group meetings, at least once every two months, to provide status updates and answer questions during the LVDG study process.

Staff instead recommends that an opportunity for discovery into relevant aspects of the Eversource MCOS Study be provided concurrently with the timeframe for engaging the study consultant, with relevant information identified through that discovery provided to the consultant as well as to other parties in the docket. That alternative approach would facilitate completion of the study within the anticipated timeline.

Staff recommends that the Commission provide an opportunity for public comment on the proposed study scope and timeline before approving a final scope and timeline for inclusion in the request for proposals to engage a consultant to perform the LVDG study.

I hereby certify that a copy of this letter and the enclosed document 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
Attorney for Staff

Enclosure
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.

| | |
|----------------------------------|---|
| Executive.Director@puc.nh.gov | cdumit@solarcity.com |
| aboyn@acadiacenter.org | chong@unitil.com |
| alesko@preti.com | christian.brouillard@libertyutilities.com |
| alexis.labrie@osi.nh.gov | Christopher.aslin@doj.nh.gov |
| alexmarquez146@gmail.com | christopher.gilrein@easycleanenergy.com |
| alinder@nhla.org | christopher.goulding@eversource.com |
| allen.desbiens@eversource.com | christopher.skoglund@des.nh.gov |
| amanda.noonan@puc.nh.gov | clayaz23@gmail.com |
| b.hayden@standardpower.com | clifton.below@gmail.com |
| bargetsinger@keyesfox.com | clyde.carson@gmail.com |
| becca.polisuk@sunrunhome.com | crauscher@sunrun.com |
| belder@eq-research.com | cshute@vermontlaw.edu |
| besakkimuthu@daymarkea.com | cynthia.trottier@libertyutilities.com |
| bking31415@gmail.com | david.lepie@libertyutilities.com |
| bob.reals@libertyutilities.com | david.shulock@puc.nh.gov |
| brian.buckley@oca.nh.gov | david.wiesner@puc.nh.gov |
| brian.rice@eversource.com | deandra.perruccio@puc.nh.gov |
| brianna@nhsea.org | debski@unitil.com |
| bross@consumerenergyalliance.org | dholt@consumerenergyalliance.org |
| bvaugh@townandcitylaw.com | dlittell@raponline.org |
| callnanb@nhec.com | donald.kreis@oca.nh.gov |
| camerinos@nhec.com | donoghue@norwichtech.com |
| canderson@borregosolar.com | downesm@unitil.com |
| carroll@unitil.com | eburgess@strategen.com |
| catherine.marsellos@puc.nh.gov | |

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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:
- DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- 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.

edward.davis@eversource.com
cemerson@primmer.com
chawes@acadiacenter.org
eisfeller@unitil.com
elizabeth.nixon@puc.nh.gov
energyclinic@vermontlaw.edu
epler@unitil.com
eric.stanley@libertyutilities.com
f.anne.ross@puc.nh.gov
fortunat@revisionenergy.com
furino@unitil.com
glenn@scenienursery.net
greg@southpacksolar.com
harringt1@metrocast.net
heather.tebbetts@libertyutilities.com
henry@nhsea.org
info@mainstreetbookends.com
ipahl@icloud.com
jack@revisionenergy.com
jaimie@granitstatesolar.com
james.brennan@oca.nh.gov
jameskw@nhbfa.com
jared.chicoine@nh.gov
jarvis@unitil.com
jbesser@neccc.org
jdickerson@neccc.org
jeb.bradley@leg.state.nh.us
jim_obrien@tnc.org
jkennerly@seadvantage.com
jlu@daymarkea.com
joseph.doiron@nh.gov
jrodier@mbtu-co2.com
jvanrossum@clf.org
jvoyles@consumerenergyalliance.org
kaminski@nhcc.com
karen.cramton@puc.nh.gov
karen.sinville@libertyutilities.com
kat@solarendeavors.com
kate@nhsea.org
katherine.peters@eversource.com
kim.quirk@gmail.com
kkelly@daymarkea.com
kristi.davie@eversource.com
kurt.demmer@puc.nh.gov
lee.oxenham@leg.state.nh.us
leonardc@nashuanh.gov
leszek.stachow@puc.nh.gov
lgallant@preti.com
lon.huber@navigant.com
madeleine@nhsea.org
marc.lemenager@eversource.com
marc@neratepayers.org
marge.shepardson@gmail.com
Mary.Schwarzer@puc.nh.gov
matt@sunraiseinvestments.com
matthew.fossum@eversource.com
maureen.karpf@libertyutilities.com
mbirchard@clf.org
mconway@borregosolar.com
mdean@mdeanlaw.net
melissa.price@eversource.com
michael.sheehan@libertyutilities.com
michael.sisto@puc.nh.gov
michael.vose@leg.state.nh.us

mlebel@acadiacenter.org
mloiacono@daymarkea.com
mulin@revisionenergy.com
nathan@votesolar.org
ocalitigation@oca.nh.gov
palma@unitil.com
paula.maville@lebcity.com
pbean@solarcity.com
pbrown@preti.com
pchernick@resourceinsight.com
perrym@nashuanh.gov
pjaesd@comcast.net
pmartin2894@yahoo.com
pradip.chattopadhyay@oca.nh.gov
ran@essexhydro.com
rburke@nhla.org
rebecca.ohler@des.nh.gov
rhonda.bisson@eversource.com
richard.chagnon@puc.nh.gov
richard.labrecque@eversource.com
rick.white@eversource.com
robert.bersak@eversource.com
robertbackus05@comcast.net
samantha.a.baker@lmco.com
sandra@plymouthenergy.org
sarah.knowlton@libertyutilities.com
sberman@daymarkea.com
sfaryniarz@daymarkea.com
simpsonc@unitil.com
slamb@biaofnh.com
smaslansky@nhcdfa.org
sprague@unitil.com

Stephen.Eckberg@puc.nh.gov
Stephen.Hall@libertyutilities.com
stettenheim@norwichtech.com
stevch@revisionenergy.com
steven.mullen@libertyutilities.com
stower@nhla.org
tanya.wayland@puc.nh.gov
taylorp@unitil.com
teamnh@energyservicesgroup.net
tirwin@clf.org
tmichelman@seadvantage.com
tom.frantz@puc.nh.gov
treardon@rocnh.org
wpratt@utilidata.com