



**CLEAN ENERGY NH**

Your Voice in All Energy Matters

14 Dixon Ave, Suite 202 | Concord, NH 03301 | 603.226.4732

March 14, 2022

Daniel C. Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

**RE: DRM 21-142, Community Power Coalition of New Hampshire, Petition for Rulemaking to Implement RSA 53-E for Community Power Aggregations by Stakeholders**

**Clean Energy NH Comments on Initial Proposal for Puc 2200 Municipal and County Aggregation Rules**

Dear Chair Goldner,

Clean Energy NH (CENH), also a member of the Community Power Coalition of New Hampshire (CPCNH), submits this letter in unequivocal support of the proposed rules under consideration in this docket.

CENH believes that Community power aggregation (CPA) is an invaluable tool for New Hampshire cities, towns, and villages to reduce their collective energy costs and speed the transition to cleaner and more local electric power sources. By aggregating the purchasing power across a community and having greater flexibility in energy contracting than traditional regulated electric distribution utilities, CPA programs can harness private sector innovation to lower costs for their customers.

CENH also submits the following points of emphasis:

1. Puc 2205.16(e): This provision establishes a 90-day time limit from adoption of the proposed Puc 2200 rules for each electric distribution utility to file a purchase of receivables (POR) program proposal for review and approval by the PUC in an adjudicated proceeding.

The adoption of a POR program is a critical path element for some, if not all, community power aggregations (CPAs) to successfully launch. The POR programs are necessary as some of the competitive electric suppliers that could supply NH CPAs have already indicated they are unlikely to bid on CPA loads without a POR program in place. Their concern is that, without a POR program, payment on past and present CPA receivables would be subordinate to most other utility receivables. Without the development of a



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POR program, fewer competitive electric suppliers may enter the NH market, reducing the potential for the CPA programs to reduce electricity rates and total costs for participants.

2. Puc 2204.02(a)(4)-(8): These provisions outline the requirements relative to net-metered energy systems and other distributed energy resources (DERs) and is imperative that committees have this information in their planning stage to properly determine load.

The exports from DERs to the grid by customer-generators is accounted for as an offset to the wholesale load obligation of the customer-generator's electricity supplier. Knowing this upfront is critical to suppliers accurately developing bids for supply. Such information may also be important in determining the terms a CPA program may offer to its net-metered customers.

CENH appreciates the opportunity to provide these comments and respectfully requests that the Commission consider approving the rules as presented in CPCNH's petition.

Consistent with current Commission policy, this filing is being made electronically only.

Sincerely,

/s/ Chris Skoglund

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cc: Service List in DRM 21-142