

March 28, 2022

Mr. Daniel C. Goldner, Chair
New Hampshire Public Utilities Commission
21 South Fruit Street
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

Dear Chair Goldner,

Good Energy & Standard Power hereby submit reply comments on the matter referenced above. Good Energy & Standard Power are a full-service Community Power consulting team, with significant collective experience in managing Community Power programs elsewhere in New England and power procurement in New Hampshire. Our team is working on Community Power plans with the City of Keene and Towns of Marlborough, Swanzey and Wilton.

Our team appreciates the efforts of utilities and other stakeholders to reach consensus on a set of rules that can enable the full potential of Community Power in New Hampshire. After reviewing initial comments and participating in the stakeholder discussion on March 23, 2022, we offer the following limited comments.

All references to the proposed rules are to the document marked "Initial Proposal 1-10-2022" from February 3, 2022 ("Initial Proposal"). References are also made to the utilities' joint reply comments ("Utility Comments") and "Initial Proposal Redline Comments" ("Utility Redlines")

1. **Purchase of Receivables (POR):** The Utility Redlines removed PUC 2205.16 (e) which would require each utility to file a POR program within 90 days of the effective date of the Community Power rules. We understand the primary objection to this deadline is from New Hampshire Electric Co-Op, which has not implemented POR in any other state and therefore may need more time to design and evaluate a POR system. In contrast, the other New Hampshire utilities have experience deploying POR in other states.

It is understandable that experience with POR would enable some utilities to move faster than others. As a result, we suggest that the rules be adjusted to require 1) a 90 day deadline for any utility which currently has POR operating elsewhere and 2) a 180 day deadline (or longer if the PUC deems it reasonable) for any utility which does not have POR operating elsewhere.

2. **Data:** The Utility Joint Comments included a Core Functionality Approach ("CFA") which proposed a certain set of reports based on data currently available in utility systems, as a set of data that is more limited than in the Initial Proposal. In the stakeholder meeting, it

was discussed that both the absence of POR and the specific scope of New Hampshire's Community Power law may necessitate additional data compared to that provided by utilities in Massachusetts, for example.

Based on the Community Power plans developed or under development by our communities, our team believes that the CFA would be sufficient to launch such Community Power programs; however, we recognize that additional data would be beneficial, particularly to program evolutions. For example, much of the data from the Initial Proposal that the utilities would not provide in the CFA concerns the Electric Assistance Program and net metering. Communities such as Keene plan to utilize consolidated billing at launch, which means that EAP benefits would be applied to the bill by the utility and net metering credits would continue to be banked and applied to the bill by the utility. Over time, however, the City may want to develop more sophisticated ways to distribute EAP benefits and/or to develop innovative net metering support, which would require more data.

To this end, our team supports the suggestion made by Colonial Power Group, in its initial comments dated March 14, for some items to be provided once the rules go into effect and for some items to be made available at a later date. If needed, we also support the suggestion from Colonial Power Group that some items be provided for a fee, however, we believe that the data in the Initial Proposal is reasonable for cities and towns in New Hampshire to run dynamic, innovative Community Power programs, and therefore should be provided without fee.

For data available when the rules go into effect - Our team would like to see the rules go into effect as soon as possible, to enable our communities the option of launching their programs. Therefore, we suggest that the data to be provided when the rules go into effect be very similar to the CFA, with a few changes as outlined below:

- a) **PUC 2203.02: Provide CFA Report 1.** During the stakeholder discussion, the utilities indicated that two items were likely listed erroneously in CFA Report 1: counts of Net Energy Metering customers and counts of Electric Assistance Program customers. The utilities should clarify whether these are included. Our team would like them included, but notes they are not absolutely necessary when the rules go into effect.

Given that this data is provided to Community Power Committees, which may not have the ability to anonymize or appropriately protect data, our team supports the goal of the Initial Proposal that the data be anonymized so that non individual customer data is provided.

- b) **PUC 2204.02:**
 - i) **Provide CFA Report 2, however we suggest that this be non-anonymized data.** This data is not provided to a Community Power Committee but to the aggregator (i.e. the municipality or their agent).

Aggregators, like suppliers, have responsibilities to protect customer information and they will receive non-anonymized data in other reports. Further, the data provided in CFA Report 2 would be used to bid out the supply. Anonymizing the data adds work for the utilities and it also reduces the granularity of the data that suppliers will review for bidding. Anything that reduces the granularity of the data has the potential to add risk premium into the supply pricing.

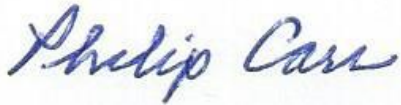
- ii) **Provide a new piece of data:** in the absence of POR, to provide for the Large C&I rate class (i.e., aggregated at the rate class level, not individual accounts) total revenues billed, actual receipts, and past due accounts receivable for each of the most recent 12 months. The need for these billing receipts was discussed at the stakeholder meeting on 3/25. It appears that billing receipts for all rate classes would be overly burdensome for the utility and further, that the Large C&I rate class represents the largest risk source to suppliers. Therefore providing only data for the Large C&I rate class could be an efficient compromise. While the Initial Proposal includes billing receipts in the data provided to Community Power Committees in PUC 2203.02, our team suggests it is better offered in PUC 2204.02. This is because PUC 2204.02 data will be used for bidding with suppliers, and the Large C&I receipts would be helpful to provide to suppliers, along with the usage data and capacity tag information, as they assess the costs of serving their program.
- c) **Puc 2204.03: Provide CFA Report 3, with the addition of service address.** Many customers have a mailing address different from the service address. Typically, service address is also provided so that it can be included on the opt-out mailer, along with the account number. This ensures the customer reading the opt-out mailer knows which property the letter applies to, without needing to cross-reference it with any other documents (like utility bills).
- d) **Puc 2205.05: Provide CFA Report 3.** CFA Report 3 and Report 4 are slightly different in the Utility Comments, but in the Utility Redline it notes that they are redundant. We support the Utility Redline version that the data for 2205.05 should be the same as CFA Report 3, particularly because it includes Rate Class, which may be necessary to determine which program product or rate to enroll the new customer in.

For data to be provided at a later date: Our team would ask the utilities to have reports ready to provide the remaining data from the Initial Proposal within one year of the rules going into effect. Additionally, we make the following suggestions for other data to be available within one year of the rules going into effect.

- a) **PUC 2205.05** for New Customers: Along with CFA Report 3, it would be beneficial if aggregators had the option to request CFA Report 2 (i.e. historical usage data) for new customers, particularly those in the Large C&I class. While newly created accounts will not have usage history, it is possible that some of the 'new' customers on Default Service are those that were formerly on third-party supply and therefore have usage. Evaluating those customers' usage may be material to whether the program offers them the program rate or a market rate.
- b) **PUC 2205.13**: This is not provided in the CFA. Our team believes this information would be useful and valuable for program management and planning. We suggest that the utilities could provide reports of this data only to the extent that it is not already provided to the supplier through EDI. For example, fields such as Account Number, Mailing Address and Service Address would already be provided in monthly EDI transactions once a customer is enrolled, whereas size of a customer's behind-the-meter generation would not.

Pursuant to current Commission policy, this filing is being made electronically only.

Sincerely,



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