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February 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 23-007 Request for Approval of Lincoln 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 Lincoln Community Power Electric Aggregation Plan (“the Aggregation Plan”) filed by the Town of Lincoln in this docket on January 30, 2023, consistent with the requirement of RSA 53-E:7, 11 and the January 31, 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 3,340 accounts in the Town of Lincoln.

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 has filed a Petition for Waiver of Portions of Puc 2200 Rules. In addition, the Cooperative has filed a Petition for Extension of Deadline to File Purchase of Receivables Program.

In reviewing the Aggregation Plan filed by the Town of Lincoln, NHEC noted some issues involving customer data. In Section 6 – Program Launch, both scenarios involve requesting from the Local Distributor “a list of eligible consumers” with information “including but not limited to account numbers, billing addresses, service addresses, rate classes, historical kWh usage, ICAP tags, supplier status, electric assistance program status, and net metering status.” NHEC will be unable to provide this customer data pursuant to the Puc 2200 rules, as the historic kWh usage, ICAP tags, electric assistance program status, and net metering status are anonymized in Puc 2203.02 and Puc 2204.02, and are not part of the Puc 2204.03 customer-identified data. Puc 2205.13 identifies these data elements for customers once they become a customer of a CPA. NHEC notes that in the Aggregation Plan, enrollment in the CPA may be premised on net metering status (Section 13) and electric assistance program status (Section 14).

Assuming waivers affirming the Cooperative’s deregulated rate structures, adherence to the current EDI standard, billing and metering system limitations, and realistic deployment timelines, the Cooperative does not have any other significant concerns with Lincoln’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". The signature is fluid and cursive, with a horizontal line underneath the name.

Jeremy Clark
Financial Planning, Analysis, and Rates Manager

cc: Service List