



Town of Lincoln

Lincoln Town Hall
148 Main Street – PO Box 25
Lincoln, New Hampshire 03251-0039
Phone: (603) 745-2757
townhall@lincolnnh.org

February 23, 2023

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301-2429
ClerksOffice@puc.nh.gov

***Re: DE 23-007 Request for Approval of Lincoln Community Power Electric Aggregation Plan –
Reply Comments to New Hampshire Electric Cooperative***

Dear Chairman Goldner,

On February 13, 2023, New Hampshire Electric Cooperative (“NHEC”) filed comments on the Lincoln Community Power Aggregation (“CPA”) Plan (the “Plan”) filed by the Town of Lincoln in this docket. NHEC’s comments were very helpful as they highlighted certain details in the Plan that, when reviewed with the benefit of NHEC’s perspective, may lack sufficient clarity in context with Puc 2200. Consequently, prior to seeking final Plan approval by the Board of Selectmen, the Town intends to make a small number of clarifying changes in its Plan, as reflected in the Plan mark-up filed with this letter and as further explained below.

NHEC Petition for Waivers of Portions of Puc 2200 Rules (DE 22-080)

As noted in its petition, the Town has engaged with Colonial Power Group, Inc. (“CPG”) to provide consulting and administrative services in support of its Plan and its CPA program. CPG is an active participant in docket DE 22-080 and has pledged to keep the Town apprised of developments that may directly impact the operation of the Town’s proposed CPA program. As such, the Town understands that NHEC’s response to specific information requests described in the Town’s Plan may be delayed or waived indefinitely pending the outcome of NHEC’s petition.

Consumer Data

NHEC identifies some timing inaccuracies with the provision of certain consumer information items in section 6 of the Plan. As such, the Town proposes to make the following clarifications prior to final Plan approval by the Board of Selectmen.

Scenario 1 – Prompt Program Launch

- Request two information sets from the Local Distributor: (1) billing addresses for all consumers within the municipality, and (2) a list of anonymized information of eligible consumers including such information necessary for successful program launch ~~(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).~~

At a later time:

- Request ~~a list of~~ anonymized information of eligible consumers from the Local Distributor including such information necessary for successful program launch ~~(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).~~

Net Metering Status

NHEC comments that enrollment in the CPA may be premised on net metering status. To be clear, the Town will not preclude net metering consumers from participating in the CPA program. Section 13 goes into some detail to explain that, under certain circumstances, a net metering consumer may be better served to remain on default energy service with NHEC. Consequently, the CPA program may seek to avoid automatically enrolling such consumers on an opt-out basis and instead engage with net metering consumers to help them evaluate the comparative benefits of enrolling in the program versus continuing to take supply service from NHEC. Prior to seeking final Plan approval by the Board of Selectmen, the Town will add clarifying language in section 13 of the Plan to acknowledge that, pursuant to Puc 2200, the Town is not expected to obtain from NHEC consumer-specific information in advance of enrollment that identifies an eligible consumer's net metering status.

Electric Assistance Program

NHEC appears to have read the Plan to say that enrollment in the CPA may be premised on a consumer's electric assistance program status. The Town wishes to make clear that all consumers within the Town who may participate in a NHEC electric assistance program will be eligible to participate in Lincoln's CPA program both on an opt-out and opt-in basis. In section 14 of the Plan, the Town only intended to note that its ability to confirm or report on program participation by energy assistance consumers is dependent on the Town obtaining such identifiers from NHEC. Prior to seeking final Plan approval by the Board of Selectmen, the Town would propose to clarify section 14 as follows:

Unless otherwise conditioned by the Commission, any consumer of the Municipality enrolled in the Electric Assistance Program may participate in the CCA Program, ~~provided that~~ The Municipality's ability to identify such consumers depends on the Local Distributor ~~makes~~ making identifying consumer information available to the Municipality.

The Town appreciates the opportunity to provide these clarifying comments. Please let me know if you have any questions or concerns.

Regards,



Jane Leslie
Executive Assistant

cc:

Office of Consumer Advocate of NH: ocalitigation@oca.nh.gov

NH Department of Energy: Energy-Litigation@energy.nh.gov; registrations@energy.nh.gov

NH Electric Cooperative: CommunityAggregation@nhec.com

Colonial Power Group, Inc.: sormsbee@colonialpowergroup.com