



Professional design, installation and service of solar energy systems

August 27, 2014

Michael J. Sheehan, Esq.
Staff Attorney
NH Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301

NHPUC 27AUG'14PM1:54

RE: Draft PUC Rules 902 and 909.

Dear Attorney Sheehan,

Good Morning. My name is Sam Lavallee and I am here to represent ReVision Energy, a solar energy contractor in New Hampshire, Maine, Vermont and Massachusetts. I would like to discuss briefly two points regarding the proposed revised NHPUC's Net Energy Billing Rules for Group Net Metered solar projects.

1.) Under the existing rules, compensation for net metered generation is paid to the Host pursuant to the rate class of the host meter. However, in many cases the Host of a group net-metered project pay commercial rates while the member pay residential rates. In these cases, the residential members are compensated for net metered generation at the lower commercial rates rather than residential rates, resulting in a de facto penalty to all members and a wind fall for the utility. We recommend that the Group Net Metering Rules be revised such that the host meter is classified based on the meter tariff of its members. This is the fairest outcome for both the utility and the customers.

2.) We recommend the following highlighted change to the definition of "Facility" in section 902.09:

Puc 902.09 "Facility" means the energy generating equipment interconnected with the electric distribution system through one or more meters that the distribution utility has installed, or would have installed, in the normal course of its business. Where a group host and all group members consist of the same person or entity, "facility" means the energy generating equipment interconnected with the electric distribution system through a single meter.

As drafted, the current definition arbitrarily limits the ability of larger customers -- such as medium sized towns or cities, college campuses, school districts, medical facilities, state schools and agencies, and many others -- to build multiple distributed solar projects of under 100 kW capacity on different sites.

For example, if a single customer, such as the Town of Concord, built a 99 kW project at its landfill, net metered against other town loads, it would be a "small generator," But if it then added a second 40 kW project at a fire station or library, also net metered against other town loads, then the total capacity

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would exceed 100 kW and under the current definition of “facility” both projects would be reclassified as “large generators” – and the energy cost savings to the town would be reduced.

Because the value of solar generation per kwh is higher for facilities classified as small generators (often by as much as 30-40% compared to a facility classified as a large generator) the net effect will be to make it uneconomic for any single customer to build more than 99 kW of solar. This arbitrarily limits the ability of larger customers with dispersed buildings, or large campuses with many buildings, to participate in group net metering program.

Thank you very much for your considering of these concerns, and please feel free to contact me if you have any questions regarding these comments.

Sincerely,
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