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Debra Howland, Executive Director and Secretary  
NH Public Utilities Commission  
21 S. Fruit Street – Suite 10  
Concord, NH 03301  
November 28, 2016

Re: DE 16-576 Net Metering

Dear Ms. Howland,

Thank you to the NH PUC for inviting public comment on DE 16-576.

I offer my comments as a consumer, chair of the Rindge Energy Commission, and a retired electrical engineer. I'm also participating in the Grid Modernization Workgroup for IR 15-296.

In my experiences with the Grid Mod docket, I have learned how important data (utility and customer) and real time pricing are. Unfortunately, there seems to be very little data available to produce load profiles and other necessary tools which are essential for developing a modernized grid that supports Demand Response (DR) and Distributed Generation (DG). Personally, I find it shocking to learn how little data the utilities have on their own systems. I don't understand how the utilities can present DG as an existential threat to their business when they have little or no data to support that contention.

In particular, I support the testimony of Paul Chernick of Conservation Law Foundation and his recommendations,

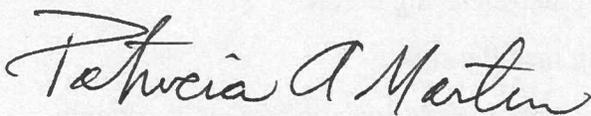
- “• Maintain the net metering program.
- Exclude the system benefit charge from the net-metering credit.
- Avoid setting any firm cap on net-metering installations.
- Establish declining net-metering credits for new installations on feeders for which hourly maximum distributed-generation output net of load exceeds half the feeder capacity, except for systems that do not add to the reverse load flow (e.g., with storage).
- Review the feasibility of providing incentives for group net-metering projects that serve targeted customer groups, especially low-income customers.

- Require that a stakeholder process be initiated once installed and pending net-metering capacity exceeds 5% of peak load, to consider whether any changes are warranted in compensation for additional net-metering installations.
- Initiate a regulatory review of net-metering arrangements once installed and pending net-metering capacity exceeds 10% of peak load.
  - Initiate a review of rate design, to investigate the feasibility of replacing demand charges with more efficient time-varying rates and of expanding time-varying rates to additional tariff classes.
  - Move toward full decoupling of distribution revenue from sales, to protect utilities from short-term lost revenues from distributed generation and energy-efficiency programs.
  - Invite proposals for net-metering pilot programs, including pilots that test the use of time-varying rates in connection with net metering and that focus on alleviating locational constraints using distributed generation, targeted efficiency and other non-transmission alternatives .”

As to the last recommendation, the testimony of Clifton Below of Lebanon offers a proposal for a pilot program that tests the use of time-varying or real time pricing.

In summary, I applaud the Legislature and the PUC for opening this docket, but think with a Net Metering penetration of less than 2%, and insufficient data/instrumentation to support Time of Use or Real time pricing, that changes to Net Metering other than the modifications described by CLF (Deduct SBC) are premature. I look forward to participating in the docket as a consumer and appreciate the welcoming attitude of the PUC in inviting public participation.

Sincerely,



Patricia A Martin