

STATE OF NEW HAMPSHIRE

Inter-Department Communication

NHPUC 23AUG17PM4:28

DATE: August 23, 2017

AT (OFFICE): NHPUC

FROM: Elizabeth Nixon, Utility Analyst 

SUBJECT: Staff Recommendation Regarding Suspension of Unitil Energy Systems, Inc.
Compliance Tariff Filing
DE 16-576, Alternative Net Metering Tariffs

TO: Martin P. Honigberg, Chairman
Kathryn M. Bailey, Commissioner
Debra A. Howland, Executive Director and Secretary

CC: Tom Frantz, Director, Electric Division
David K. Wiesner, Staff Attorney

On July 24, 2017, Unitil Energy Systems, Inc. (Unitil) filed a compliance tariff filing as required by Order No. 26,029 issued on June 23, 2017 in Docket No. DE 16-576, Alternative Net Metering Tariffs. Commission Staff has reviewed the Unitil compliance tariff filing and has been unable to determine whether all of the proposed provisions are compliant with that Order and other applicable standards. In particular, Staff has questions regarding the following provisions of the proposed compliance tariff sections:

- On Revised Page 78, Item 2, Metering, the tariff states the following:

Large customer generators may be required to install and maintain a dedicated phone line to facilitate the installation of an interval meter with telemetering capability so that the generator can be registered with ISO-NE as a settlement only generator.

Staff notes that ISO New England Operating Procedure No. 18, Metering and Telemetering Criteria, on Page 8, Section V, 1. (d) states that “[n]o telemetering is required for Generators receiving “Settlement Only” treatment...” Therefore, it is unclear whether this requirement should be included in the tariff.

- On Revised Page 77, the proposed compliance tariff filing does not refer to the Interim Net Metering Tariff approved by Order No. 25, 972 (December 21, 2016), in addition to the tariff effective beginning on September 1, 2017 as approved by Order No. 26,029 (June 23, 2017).
- On Page 78-A, Item 4, Renewable Energy Certificates, the tariff states:

Any customer requesting a Company-owned production meter or requesting the Company to serve as the independent monitor must agree to all terms and conditions provided by the Company and responds in a timely manner to requests for information from the company.

Staff notes that this language is unclear as to the applicable requirements, and potentially should be revised to provide greater clarity or otherwise deleted in its entirety.

Staff therefore recommends that the Unitil compliance tariff filing be suspended under RSA 378:6, I(b), in order to permit additional time for Staff's evaluation to be completed and for Unitil to make any warranted tariff revisions prior to the specified effective date of September 1, 2017.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**

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