

THE STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DOCKET NO. DE 16-576

Electric Distribution Utilities

**COMMENTS OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A
EVERSOURCE ENERGY
RE: LOW AND MODERATE INCOME PILOT PROGRAM REQUIREMENT**

On June 23, 2017, the Commission issued Order No. 26,029 which, among other things, accepted and resolved various settlement matters and set a new net metering tariff for utilities in New Hampshire. Relevant to this submission, in the course of its Order the Commission required that New Hampshire's electric utilities, including Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource"), develop a pilot proposal that would "make the benefits of solar DG system ownership available to low and moderate income customers whose circumstances would otherwise not allow them to participate in a net-metered renewable energy project." Order No. 26,029 at 63. Further, the Commission concluded that "The utilities should have the opportunity to recover their prudently-incurred costs of development and implementation of all approved pilot programs." *Id.* at 66. On May 30, 2019, in what has been docketed as Docket No. DE 19-104, Eversource submitted its Clean Innovation Community Solar Pilot Proposal which, if approved, would bring the benefits of distributed solar generation to low and moderate income ("LMI") customers in New Hampshire.

On August 9, 2019, in the instant docket the Commission Staff filed a recommendation regarding the development of LMI pilot programs. The Staff recommendation noted that in light of the recent passage of two pieces of legislation, it appeared that the requirement of Order No. 26,029 regarding the development of LMI pilot programs was no longer necessary. The Staff

recommended that the Commission consider eliminating the LMI pilot program requirement as it was contained in the order. On that same date, the Commission issued a secretarial letter scheduling a public comment hearing on the Staff recommendation on August 27, 2019 and allowing for the submission of written comments by September 3, 2019. Eversource appeared at the public comment hearing and offered its comments and hereby supplements those comments with this submission.

In that Eversource provided the Commission with its position relative to the requirement for LMI pilot programs as it related to Eversource's Clean Innovation Community Solar Pilot Proposal, Eversource will not repeat those comments here. Rather, Eversource will refer the Commission to the comments made at the August 27, 2019 public comment hearing.

Eversource, does however, take this opportunity to point out two items worth emphasizing.

First, based on the Staff comments during the August 27, 2019 session, Eversource makes clear its understanding from those comments that regardless of the Commission's determination relative to the requirements of Order No. 26,029, that determination will not impact the viability of Eversource's Clean Innovation Community Solar Pilot Proposal in Docket No. DE 19-104. Eversource understands that its proposal will continue to be reviewed and evaluated for implementation. Eversource supports the continued review of its proposal and believes that its proposal provides meaningful benefits for New Hampshire customers and that it should be approved and implemented.

Second, and as noted above, when the Commission required the utilities to develop LMI pilot proposals, it also made clear that utilities would be entitled to recover the prudently-incurred costs of developing and implementing those proposals. Eversource recommends that even if the Commission determines that the pilot program requirements of Order No. 26,029

should be eliminated, the Commission should make clear that utilities are still entitled to recover the prudently-incurred costs of developing and implementing such proposals. As noted at the August 27 session, Eversource has spent substantial time and effort in the development of its proposal and it should have the opportunity to recover the prudently-incurred costs relating to that proposal irrespective of any potential changes that might now be made to the requirements of Order No. 26,029.