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Dianne Martin, Chair
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: Docket No. DE 16-576 - Electric Distribution Utilities Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators Public Service Company of New Hampshire d/b/a Eversource Energy

Chair Martin:

This letter is being filed with the New Hampshire Public Utilities Commission (“Commission”) on behalf of Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “the Company”), in support of the motion filed yesterday by the New Hampshire Department of Energy (“Department”) to extend the suspension of the deadline for utility submission of Low and Moderate Income (“LMI”) community solar pilot programs to July 1, 2022.

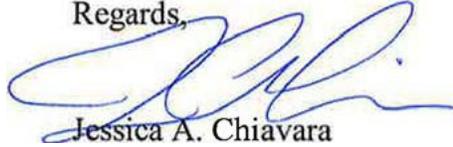
Eversource understands that several variables have likely contributed to the lack of development of LMI solar projects during the suspension period from October 2019 to October 2021, including the ongoing effects and impacts of the COVID-19 pandemic on developers and contractors throughout the state. The Company also agrees with the Department that at this time, should the utility pilot programs move forward on October 1, there is a chance of duplicative efforts, which would run counter to the purpose of Commission Order No. 26,029 that created the utility LMI solar pilot program.

Conversely, if the deadline for submission of these pilot programs were to be extended, the market and the Renewable Energy Fund grant program will have an opportunity to harness the incentives provided by SB 165 which, as the Department noted, have only been available for just over a year. If presented with an extension of the submission deadline, the utilities in turn would be able to use that additional time for further stakeholder outreach and data collection to hone these pilots and best target the challenges that may be impeding the statewide market for development of LMI community solar projects, if that is in fact what the next year bears out.

The Company has been diligently preparing its pilot program for submission to the Commission on October 1, and looks forward to contributing to the development of this important work. But at this time, Eversource supports the Department’s recommendation of extending the suspension of the utility pilot programs until July 1, 2022 to better discover what the impacts of SB 165, SB 129 and the Renewable Energy Fund will be on the development of LMI community solar projects statewide. The Company believes that such a suspension would be consistent with the intent of Order No. 26,029 to develop this project work and with the purpose of the suspension of the utility pilots created by Order No. 26,297 to prevent redundancies in that development.

The Company also notes and reiterates the Department's request that the Commission, if it is to extend the submission deadline, do so at the earliest possible date in advance of October 1. Eversource appreciates the Commission's and the Department's continued attention to this area of energy policy. Pursuant to current Commission policy, this filing is being made electronically only.

Regards,



Jessica A. Chiavara
Counsel, Eversource Energy

CC: DE 16-576 Service List