

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DE 16-576**

**Development of New Alternative Net Metering Tariffs and/or  
Other Regulatory Mechanisms and Tariffs for Customer-Generators**

**Order Addressing Non-Wires Alternative Pilot Programs**

**ORDER NO. 26,124**

**April 30, 2018**

In this order, the Commission directs the parties to this proceeding and Staff to focus on the locational value of distributed generation to the utility distribution system through study and analysis of relevant data. This analysis will help inform the distributed energy resource valuation study as well as the Commission's evaluation of future net metering tariff development. Further, the Commission determines that the electric distribution utilities should suspend efforts to develop non-wires alternative pilot programs in the context of net metering tariff development.

**I. PROCEDURAL HISTORY**

In Order No. 26,029, issued in this docket on June 23, 2017 (June Order), the Commission approved the adoption of a new net metering tariff. That tariff was designed to be in effect for a period of years while additional data is collected and analyzed, pilot programs are implemented, and a distributed energy resource (DER) valuation study (Value of DER study) is conducted. Renewable energy distributed generation (DG) systems that are installed or receive a net metering program capacity allocation during that period of years will have their net metering rate structure grandfathered until December 31, 2040.

The June Order directed that four types of pilot programs be developed and implemented, including non-wires alternative (NWA) pilot programs. The Commission anticipated that the pilot programs would,

provide valuable experience and data demonstrating the effects of DG on potentially-stressed components of the utility distribution system at specific locations. Such pilots should also provide insight into the incentive levels needed by DG developers to site their projects where they would have the greatest potentially positive impacts.

June Order at 63-64. The NWA and other pilot programs were to be developed and filed after review and discussion with interested stakeholders through a working group process. *Id.* at 65.

Commission Staff (Staff) reported that stakeholders agreed the Commission should solicit comments and clarify certain issues before further development of NWA pilot programs. Staff recommended that the Commission request written comments from the parties pertaining to a number of specific questions. The Commission issued a secretarial letter directing parties to submit written comments by December 8, 2017, that answered the following questions:

1. Should the NWA pilot programs be limited to distributed generation projects or should the pilot programs also be open to other distributed energy resources such as demand response, energy efficiency measures, or battery storage, either on a standalone basis or in concert with DG installations?
2. If the NWA pilot programs are open to other DERs in addition to DG, will the pilots provide sufficient “experience and data demonstrating the effects of DG on potentially stressed components of the utility distribution system at specific locations,” per the June Order?
3. If the answer to question 2 above is negative or uncertain, should NWA pilot programs be undertaken in this docket?
4. If the answer to question 3 above is negative, should NWA pilot programs instead be deferred for potential implementation in other contexts, such as utility integrated resource planning dockets or grid modernization initiatives?
5. If NWA pilot programs are not undertaken in this docket, should studies be conducted to determine the potential benefits of DG deployment as a means of avoiding or deferring distribution system capital projects in specific locations?

6. If NWA pilot programs are not undertaken in this docket, should maps or other presentations be prepared showing locations where DG installations potentially would be beneficial as a means of avoiding or deferring distribution system capital projects?
7. If NWA pilot programs are not undertaken in this docket, should some other methodology not identified above be used to determine the potential benefits of DG deployment as a means of avoiding or deferring distribution system capital projects?

The Commission received six written responses from groups or individuals. One set of comments came from the Acadia Center; the Alliance for Solar Choice; Conservation Law Foundation (CLF); Energy Freedom Coalition of America, LLC; ReVision Energy, LLC; and Vote Solar (collectively, the Joint Commenters). Another set of comments came from Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource); Liberty Utilities (Granite State Electric) d/b/a Liberty Utilities (Liberty); Unital Energy Systems, Inc. (Unitil) (collectively, the Joint Utilities). The Office of the Consumer Advocate (OCA), the City of Lebanon (Lebanon), the Department of Environmental Services (NHDES), and Representative Lee W. Oxenham (Rep. Oxenham)<sup>1</sup> also submitted comments.

On February 16, 2018, Staff recommended modifications to the June Order. In particular, Staff recommended that utility and stakeholder development efforts focus on study and analysis rather than the design and implementation of NWA pilot programs. A public comment hearing was held on March 13, 2018, and written comments were filed thereafter by Acadia Center, CLF, and Unitil.

The June Order and subsequent docket filings, as well as all earlier filings in this matter, other than any information for which confidential treatment has been requested of or granted by the Commission, are available at <http://puc.nh.gov/Regulatory/Docketbk/2016/16-576.html>.

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<sup>1</sup>While Rep. Oxenham is a State Representative, she participated in this proceeding as an individual ratepayer. *See* Prehearing Conference June 10, 2016, Transcript at 13-15.

## II. POSITIONS OF THE PARTICIPANTS

### A. Joint Commenters' Initial Comments

The Joint Commenters asserted that the NWA pilot programs should be “technology-neutral” and include DERs in addition to DG, as contemplated in the Energy Freedom Coalition settlement proposal. Joint Commenters' Initial Comments at 1-2. The inclusion of other DERs, as other states have done, would help resolve grid problems and save ratepayers money. *Id.* The NWA pilot programs could still require a specified “carve-out” amount of DG in order to yield sufficient data for evaluating its effectiveness. *Id.* at 3-4.

The Joint Commenters recommended that non-exclusive NWA pilot programs be implemented for three purposes, to inform a study that would try to place a value on DERs; to ensure that New Hampshire ratepayers do not pay for unnecessary utility investments; and to facilitate a better understanding of the benefits of DER deployment. *Id.* at 5. According to the Joint Commenters, even with the NWA pilot programs, maps and other presentations providing information about grid conditions also would be valuable tools for stakeholders. *Id.* at 4. They cited mapping initiatives in New York and other states as examples of those beneficial uses. *Id.* at 5.

The Joint Commenters also maintained that programs and studies conducted in other states, including New York and Maine, could be used to understand the benefits of deploying DERs.<sup>2</sup> *Id.* at 3, 5.

### B. Joint Utilities' Initial Comments

The Joint Utilities argued that any NWA pilot program that includes only DG “is unlikely to yield cost-effective and meaningful insights into the ability of DG to avoid or defer traditional utility investments” because DG’s ability to produce energy during relevant time periods may

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<sup>2</sup> The Joint Commenters specifically identified Consolidated Edison’s Brooklyn-Queens Demand Management NWA program and the GridSolar project, located in the New York City and Boothbay, Maine, areas, respectively.

depend on intermittent fuel sources or favorable weather conditions. Joint Utilities' Initial Comments at 1-2. The Joint Utilities believe that NWA pilot programs contemplated in this proceeding should be limited to DG only projects and should not include other DERs, such as demand response and energy efficiency measures. *Id.* at 2. They argue that pilot program eligibility should be based on the statutory definition of "customer-generators" eligible for net metering. *Id.* at 2 (citing RSA 362-A:1-a, II-b and RSA 362-A:9, XVI). If other DERs were included, it is unclear how the effectiveness of DG could be determined separately from other DERs. *Id.* at 2-3.

The Joint Utilities maintained that the contribution of solar DG to reducing demand during peak hours could be determined by studying data from existing solar projects in New Hampshire, without the expense and delay of implementing any NWA pilots. *Id.* at 3. Possible NWA programs should be evaluated for implementation in another context, such as the grid modernization investigation pending in Docket IR 15-296 (Grid Mod Docket). *Id.*

According to the Joint Utilities, the scope of the Value of DER study is expected to include an assessment of DG's benefits to the distribution system, regardless of the existence of NWA pilot programs. *Id.* "[A]n analytical approach to this issue is a cost-effective and meaningful way to approach this valuation debate." *Id.* Mapping initiatives such as "hosting capacity maps" or "beneficial location maps" should be considered for development as part of the Grid Mod Docket or in another appropriate context. *Id.* at 4. Although numerous other methods may exist for determining the potential benefits of DG deployment, it is not necessary that any of those other methods be "created or enforced" for implementation in this proceeding. *Id.*

### C. Office of the Consumer Advocate's Initial Comments

The OCA asserted that the NWA pilot programs should not be limited to DG. OCA Initial Comments at 2-4. Instead, they should be conducted on a technology-neutral basis, possibly with a DG element required for each program, in order to procure a portfolio of cost-effective measures. *Id.* The OCA cited the trend in other states to implement non-exclusive "NWA solicitation frameworks." *Id.* at 2-3 (specifically referencing California and New York). Unaware of any instance where photovoltaics alone have been used to avoid a traditional distribution infrastructure investment, the OCA is "therefore deeply concerned that any DG-only NWA deferral pilot may fail due to its lack of resource diversity, resulting in unnecessary costs being borne by ratepayers." *Id.* at 3.

As an alternative approach, the OCA suggested that the Commission and Staff retain an independent NWA consultant before providing further guidance on the scope of the NWA pilots. *Id.* at 4. Opening the NWA pilot programs to DERs other than DG would not prevent resource-specific evaluation, measurement, and verification to determine the effects of DG on potentially-stressed components of the distribution system. *Id.*

According to the OCA, there would be missed savings opportunities for ratepayers if NWA pilot programs were delayed. *Id.* at 5-6. If NWA pilot programs are not undertaken in this proceeding, other studies and methodologies should be used to determine the potential benefits of using DG in order to avoid or defer distribution system capital projects. *Id.* at 6-7. Those studies might include two elements: (1) a DG monitoring and modeling exercise designed to enhance understanding of the peak coincidence and real-world degree of variability attributable to various photovoltaic installations; and (2) utility-specific de-averaged marginal cost-of-service studies to identify location-specific avoided costs associated with DERs. *Id.* at 6.

Maps such as the National Grid New York interactive map could also be prepared to show locations where DG installations may be beneficial. *Id.*

The OCA suggested directing the utilities to “ascertain and provide de-averaged distribution system avoided costs in a manner similar to the Nexant study commissioned by Central Hudson in New York [the Nexant Study].” *Id.* While acknowledging the potential costs of such an analysis, the study would represent a “useful exercise” that is “arguably critical for stakeholders and the Commission to understand the distribution system impacts of DER[s] and avoid unnecessary stranded costs in the future.” *Id.* at 6-8.

#### **D. City of Lebanon’s Initial Comments**

Lebanon argued that the exclusion of DERs other than DG in the NWA pilot programs would limit their ability “to best reveal the value of DG in synergy with or in competition and comparison with other DER alternatives and the traditional wires solution itself.” Lebanon Initial Comments at 1. Such a limitation also would contravene New Hampshire’s energy policy, as stated in RSA 378:37, to “maximize the use of cost effective energy efficiency and other demand resources.” *Id.* The June Order directed that projects selected for the NWA pilot programs should be those that, in addition to meeting reliability and other criteria, “result in the greatest [net] utility cost avoidance or deferral.” *Id.* at 1-2 (citing June Order at 64). According to Lebanon, inclusion of other DERs in the NWA pilot programs would allow for the evaluation of all potential solutions, which may include a combination of DER and DG components. *Id.* at 3.

Lebanon is primarily concerned that Liberty’s implementation of NWAs, approved in Order No. 26,039 as part of Liberty’s 2016 Least Cost Integrated Resource Plan, not be delayed. *Id.* at 2-4. The value of DG to the distribution system is an integral element of the value of DER, even if NWA pilot programs are not implemented in this docket. *Id.* at 4. Lebanon advocated

for the development of smart rate structures and competitive retail electricity markets with sharing platforms to determine the value of various DERs to distribution and transmission grids and to energy markets. *Id.* at 4-5.

#### **E. NHDES's Initial Comments**

The NHDES maintained that the NWA pilot programs should include DERs because inclusion of DERs could result in more effective ways of avoiding transmission and distribution investments than DG alone. NHDES Initial Comments at 2-3. Inclusion of other DERs would produce valuable data about the impacts of NWA on the grid. *Id.* The experience and data gained from NWA pilot programs including all DERs may be applied to other initiatives, such as those developed through the Grid Mod Docket. *Id.* NWA pilot programs should be undertaken as part of this net metering proceeding. *Id.* at 4. If not, NHDES would support studies of DG and other DER benefits, including the evaluation of all methods to avoid or defer the distribution system capital projects. *Id.* at 4-5.

#### **F. Lee W. Oxenham's Initial Comments**

Rep. Oxenham concurred with the Joint Commenters' initial comments.

#### **G. Staff's Recommended Modifications**

Staff recommended that the Commission modify the NWA pilot program requirement in the June Order. In Staff's view, the June Order limits the NWA pilot programs exclusively to DG, and such a limitation will not achieve the Commission's goals.

The fundamental purpose of the NWA pilot programs envisioned by the June Order was to ascertain the potential locational value of DG on the utility distribution system through capital investment, avoidance, or deferral, or through operating expense reduction or deferral. That information would then be used in the overall Value of DER study, the results of which will inform the Commission's evaluation of future net metering tariff development.

Staff agrees with those who believe that the development of DG-only NWA pilots should be reconsidered and discontinued. Staff also agrees with those who are of the view that unrestricted NWAs, open to all DERs, may not produce the relevant data regarding locational value of DG on utility distribution systems. The focus of distribution system locational valuation should be shifted to study and analysis rather than NWA pilot programs. Staff recommended modification of the June Order as follows:

1. Development and implementation of any NWA pilot programs restricted only to DG to be suspended indefinitely;
2. Acknowledgement that unrestricted NWAs may be appropriate in another context, such as grid modernization or utility integrated resource planning;
3. Direct parties in working group process to consider alternative study designs and methodologies to address potential locational value of DG on the utility distribution system, through capital investment avoidance or deferral, or operating expense reduction or deferral (e.g., equipment life extension, lower maintenance and labor costs, etc.);
4. Specifically reference the Nexant Study as a potentially relevant example of a distribution-level capacity valuation analysis;
5. Leave open the potential for distribution-level locational benefit issues to be addressed through a separate study or within the overall scope of the Value of DER study;
6. Direct parties to consider the potential for implementing one or more demonstration projects using DG plus storage to address distribution system capacity upgrade avoidance or deferral; and
7. Direct the utilities and other parties to identify and make available the data and information necessary to conduct the locational studies and analyses, and any potential demonstration projects, as described above. That data may include, for example, the following:
  - (a) actual substation equipment loading data and associated transformer condition measurements;
  - (b) actual circuit load data, i.e., voltage, power factor, current, load flow (if applicable) at the substation node and throughout the feeder at significant impedance nodes (e.g., end points, stepdown (ratio) points, and existing DER locations);

- (c) annual peak load growth at the circuit and at a more granular sub-circuit level;
- (d) actual distribution capacitor/regulator data and status;
- (e) actual kW/MW load at risk for loss of line at distribution and distribution supply level; and
- (f) actual measurement of overloaded portions of circuit feeders under normal and contingency operations, including actual sub-circuit impedances, length, ratings (normal, short term/long term emergency).

#### **H. Parties' Comments on Staff Recommendation**

During the public comment hearing, Eversource expressed support for Staff's recommendation to focus on a study approach rather than NWA pilot programs. Transcript of Hearing 3/13/18 (Tr.) at 6. Nonetheless, Eversource questioned the data specifications contained in Staff's recommendation, both the requirement of data collection from non-utility parties and the detailed data list. *Id.* at 6-7. The required data should be limited to that which is readily available to the utilities. *Id.* at 7-8. Furthermore, the data should remain unspecified until the study scope is determined, the study methodology is defined, and a selected consultant has decided the necessary data. *Id.* The requirement to "provide an unrestricted and unlimited list of information ahead of time seems wasteful and unnecessary." *Id.* at 14.

The OCA expressed support for technology-neutral NWAs to save costs relative to traditional utility system upgrades. The OCA stressed further development of NWA approaches in the grid modernization context and requiring NWA implementation in the utility integrated resource planning process. *Id.* at 9, 11-13. The OCA supported suspension of DG-only NWA pilots in favor of focusing on a distribution capacity avoidance or deferral study approach. *Id.* at 9-10. The OCA also stated that references to the use of the Nexant Study and to the detailed list of required data items are useful. *Id.* at 10-11.

The Acadia Center argued that NWA pilot programs should be implemented and should include participation by broadly-defined DERs with an express “carveout for DG-only” component. Acadia Center Comments at 1. Development of NWAs should not be deferred until grid modernization or integrated resource planning initiatives are implemented. *Id.* at 2. Both an NWA pilot and a locational value study “would be beneficial in providing utilities with a better understanding of the benefit of DERs to inform the development of [integrated resource] plans.” *Id.*

Acadia Center also criticized the Nexant Study, claiming it “appears systematically designed to discount the value of DERs by either misrepresenting the ability of DERs to meet system needs or needlessly limiting the ability for a DER to capture that value.” *Id.* The Nexant Study methodology “ignores several important system needs, most notably in areas not undergoing growth, and those below trunkline feeders” and “excludes the ability of DERs to extend equipment life, increase reliability and resiliency, and improve power quality.” *Id.* at 3. The study considers only “a subset of potential marginal costs when estimating [value] and goes even further by proposing a complex new probabilistic method for determining when upgrades will be needed.” *Id.* It assumes that compensation for value provided to the system “should be reduced to something below the actual avoided cost, so that it results in net savings for customers,” assigning “an arbitrary rate to share avoided costs at 50%, drastically reducing the value that DERs should be compensated.” *Id.* Acadia Center maintained that, if a similar study were to be conducted in New Hampshire, it would need “to standardize the methodology used by each of the three utilities in calculating the value of NWAs, and ensure that the methodology is transparent and consistent with marginal cost of service [studies].” *Id.* at 2.

CLF asserted that NWA pilots need not exclude other DERs in order to be “focused on the installation of DG,” provided that the pilots include DG as a primary element of any NWA

“solution set.” CLF Comments at 2. Although it is possible to test the ability of DG, such as rooftop solar alone, to defer utility distribution system upgrades, it is not a “best practice ... that reflects realistic parameters.” *Id.* Rooftop solar taken alone “may be less cost-effective in some instances” than DG in combination with other DERs “that can have cost-reducing synergies when combined with customer-sided generation [such as] energy efficiency, demand response, and energy storage.” *Id.*

CLF believes it is more likely “in normal practice” that an NWA solution will be adopted “that has lower up-front costs and a larger long-term payoff,” and therefore “a combined solution set should not be excluded from consideration in the [NWA] pilots.” *Id.* at 2-3. DG need not stand alone for its effectiveness to be demonstrated and analyzed, as “there is no reason that multiple demand reducing elements cannot be combined ... to amplify cost-savings while ensuring adequate data collection.” *Id.* at 4. CLF cited the Boothbay Pilot in Maine as an example of such an approach. *Id.* CLF argued against deferring the NWA pilots for another proceeding, maintaining that “the information gained from these pilots will help to develop appropriate compensation levels for [DG], and could also be used to help develop appropriate compensation levels for other [DERs].” *Id.*

Unitil generally supported Staff’s recommended change in focus from NWA pilots to a study-based approach, but expressed other concerns. Unitil Comments at 1. The “essential planning function of the distribution system must remain in the control of the utilities,” which planning will include “new technologies, new services and the input and needs of new stakeholders.” *Id.* Expressing concern about the reliability of intermittent resources, such as DG without energy storage, Unitil supported the expansion of potential NWA projects to include other DERs. *Id.* “NWA analysis is more appropriate as part of a combined Grid Modernization

and Least Cost Integrated Resource Plan as opposed to the Net Metering Docket (especially if the NWAs are expanded to include DERs as opposed to DGs).” *Id.*

Unitil maintained that the Nexant Study is “one study approach for distribution level capacity valuation analysis” that should be evaluated by the working group, as well as “other studies in developing an approach to locational value.” *Id.* at 2. Because “[d]istribution locational value analysis is still very new,” however, caution is warranted in “pointing at any individual study at this time and instead ... all available studies [would be useful] to educate the working group.” *Id.* NWA demonstration pilot projects “may not be required” and should not be considered if such projects “might not be cost effective just for the sake of implementing a pilot project.” *Id.* Only an NWA project that meets all of the requirements of a utility solicitation and is the most cost-effective solution among the range of alternatives should be implemented. *Id.*

Unitil expressed concerns that the utilities “identify and make available the data and information necessary to conduct the location studies and analyses,” as well as the extensive list of required data included in Staff’s recommendation. *Id.* The required data list covers “essentially every piece of distribution system data that [Unitil] uses to plan and operate the system,” and would be “quite challenging for the utilities to share in a useful manner.” *Id.* Providing a large amount of data to allow third parties to study the distribution system “is not the most effective or efficient use of time,” for reasons such as the dynamic and changing nature of the system and the format and imperfect nature of available data. *Id.* at 2-3.

### **III. COMMISSION ANALYSIS**

In the June Order, the Commission directed the three investor-owned electric distribution utilities to develop and implement NWA pilot programs as a means of collecting data regarding the locational value of DG installations on the utility distribution system. As the current docket

pertains to evaluation of alternative net metering tariffs, and net metering is available only to DG, we expected that the NWA pilot programs would be limited to DG systems and not include other DERs. For the reasons discussed below, we have reconsidered those conclusions and modify the relevant findings and requirements set forth in the June Order accordingly.

We are authorized to modify those findings and requirements under RSA 365:28, which provides that the Commission “may, after notice and hearing, alter, amend, suspend, annul, set aside, or otherwise modify any order made by it,” provided that a “hearing shall not be required when any prior order made by the commission was made under a provision of law that did not require a hearing and a hearing was, in fact, not held.” In this case, a public comment hearing was held and post-hearing written comments were received.

We acknowledge the argument advanced by a majority of commenters that NWAs should not be restricted to DG installations but rather should be open to all DERs. In support of that position, they cite initiatives in other states and the experiences of other utilities, as well as policy-based arguments. For example, the Joint Commenters assert that a DG-only NWA “would limit the effectiveness of the pilot by ignoring the ability of other technologies to meet identified grid needs in concert with DG installations, and is not likely to reflect how NWAs would be deployed in the future.” Joint Commenters’ Initial Comments at 2. The OCA maintains that “limiting the reach of the [NWA] solicitation to a single technology demonstration would be a missed cost-savings opportunity for New Hampshire’s ratepayers.” As such, a limited NWA pilot “may fail due to its lack of resource diversity, resulting in unnecessary costs being borne by ratepayers.” OCA Initial Comments at 2-3.

On the other hand, the Joint Utilities assert that non-exclusive, technology-neutral NWA pilot programs would not likely provide useful results regarding the specific contributions of DG

separate and apart from other DERs without “after-the-fact analysis” of relevant interval metering data. They maintain that

the same [analytical] exercise could be performed on a hypothetical basis without the need for the expense and delay of a complete pilot project, nor the coordination of the one or more DER developers, the utility, the Commission Staff, [and] others who may look to participate in the pilot.

Joint Utilities’ Initial Comments at 3. In addition, they claim it “would be a more efficient use of time and resources to gather such data from a sample of projects and use it in an investigation of this issue.” *Id.*

Based on those arguments, we reconsider the directive in the June Order that NWA pilot programs be restricted only to DG installations. We are not persuaded, however, that unrestricted NWAs open to all DERs represent an effective means of obtaining relevant data regarding the locational value of DG on utility distribution systems. Therefore, we defer consideration of unrestricted NWA implementation, whether on a pilot or full-scale basis, to another context, such as grid modernization or utility integrated resource planning.

We immediately suspend the development and implementation of any DG-only NWA pilot programs indefinitely. We find that a distribution-level locational DG valuation study would be more useful and cost-effective, and we therefore direct the parties in the working group process to evaluate alternative study designs and methodologies to address the potential locational value of DG on the utility distribution system. Such locational value may result from capital investment avoidance or deferral, and operating expense reduction or deferral, such as through equipment life extension or lower maintenance and labor costs. The analysis of those issues might be addressed either through a separate study or within the scope of the Value of DER study, depending on which approach is determined to be most effective and efficient.

When evaluating study alternatives, the stakeholders should consider the potential merits of a distribution-level capacity valuation analysis, as in the Nexant Study, as well as other

relevant studies and analyses. The stakeholders should also consider implementing one or more demonstration projects using DG plus storage to address distribution system capacity upgrade avoidance or deferral. Any such demonstration project would be implemented only if it were filed as a formal proposal and approved by the Commission.

The utilities and other relevant parties should make available the data and information necessary to conduct the locational studies and analyses, and any potential demonstration projects. With respect to the specific data categories listed in Staff's recommendation memo, we believe this information may represent a useful starting point for further discussion, but that particular data collection and submission requirements should be developed in conjunction with the working group and ultimately in collaboration with the consultant engaged to perform the study.

We note that the Commission will participate in a multistate initiative, led by the Clean Energy States Alliance (CESA). CESA was recently selected by the U.S. Department of Energy's National Renewable Energy Laboratory (NREL) to engage in a collaborative research effort to explore new ways solar energy can improve the affordability, reliability, and resiliency of the nation's electric grid.<sup>3</sup> The Commission will work with CESA and other state partners to identify locations for DERs that provide benefits to the electric grid. The Commission's involvement will focus on identification of data needed for the Value of DER study and the potential use of NREL analytical tools and capabilities. We encourage Staff to leverage the resources and expertise available through the CESA-NREL research initiative to develop the scope and data requirements for the locational value.

Finally, we direct that a report containing the proposed scope and timeline for the distribution-level locational DG valuation study be filed by Staff within three months from the

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<sup>3</sup> See <https://cesa.org/about-us/member-news/newsitem/cesa-to-lead-multistate-initiative-solar-grid-benefits>.

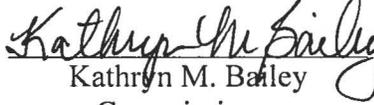
date of this order for review and approval by the Commission prior to the engagement of a consultant to perform the study.

**Based upon the foregoing, it is hereby**

**ORDERED**, that the findings and requirements set forth in Order No. 26,029 (June 23, 2017) with respect to non-wires alternative pilot programs are modified as set forth in the body of this Order.

By order of the Public Utilities Commission of New Hampshire this thirtieth day of April, 2018.

  
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Martin P. Honigberg  
Chairman

  
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Kathryn M. Bailey  
Commissioner

  
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Michael S. Giaimo  
Commissioner

Attested by:

  
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Lori A. Davis  
Assistant Secretary