MUNICIPAL AGGREGATION SUBCOMMITTEE
LEBANON ENERGY ADVISORY COMMITTEE
THURSDAY, DECEMBER 3, 2020 - 3:00 PM
REMOTE VIA MICROSOFT TEAMS
LEBANONNH.GOV/LIVE

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1. Call to Order

2. Approval of Minutes

A. May 19, 2020

3. New Business

A. Update on rules for Community Power Aggregations (CPAs)

B. Update on DE 19-197, PUC Data Platform as it relates to CPAs

C. Community Power Coalition of New Hampshire update

D. Discuss use of NHCDFA grant funds and next steps

4. Other Business

5. Open to the Public

6. Future Agenda Items

7. Next Meeting Date

8. Adjournment

Due to the current situation with the COVID-19 Pandemic, the City of Lebanon is offering its meetings via Microsoft Teams. Members of the public are encouraged to attend by going to LebanonNH.gov/Live where you will find instructions on how to enter the meeting. Members of the public will be able to participate and ask questions through the Microsoft Teams software or by phone. Please visit LebanonNH.gov/Live for full details.

THE AGENDA, IN ITS ENTIRETY IS AVAILABLE ON THE CITY'S WEBSITE AT LEBANONNH.GOV

MUNICIPAL AGGREGATION SUBCOMMITTEE MEETING MINUTES
(Subcommittee of the Lebanon Energy Advisory Committee)

Held via Microsoft Teams
May 19, 2020
10:30 AM

DRAFT

MEMBERS PRESENT: Clifton Below, F. Woody Rothe, Gregory Ames, Jonathan Chaffee

MEMBERS ABSENT: Cate Homicki, Bruce Garland

STAFF PRESENT: Tad Montgomery

GUESTS PRESENT: None

CALL TO ORDER: Meeting called to order by Clifton Below at 10:37 AM. Meeting held virtually due to corona virus pandemic.

APPROVAL OF MINUTES:

A motion was made by Woody Rothe to approve the 4/20/2020 minutes. The motion was seconded by Jonathan Chaffee. The motion was unanimously approved through a roll call vote.

If any action is taken by the Subcommittee, list motions and votes:

1. Clifton gave an update on, and the Subcommitte discussed, various NH Community Power Discussions, led by Clean Energy NH.
2. The subcommittee discussed possible ways forward with Lebanon Community Power, including an initial smaller opt-in pilot.
3. The Subcommittee continued its discussion of a proposed Municipal Aggregation Plan, continued from its last meeting.
4. The Subcommittee did not schedule its next meeting.

ADJOURNMENT:

A motion was made by Woody Rothe to adjourn the meeting at 11:29 AM. The motion was seconded by Greg Ames. The motion was unanimously approved.

Respectfully submitted,
Gregory Ames
Clerk (Recording Secretary)

Commission Staff's proposed revisions to the Puc 2000 rules regarding competitive electric power suppliers and aggregators related to implementation of community power aggregation under RSA 53-E, as amended by Senate Bill 286 (2019).

AMEND Puc 2001.02 "Application of Rules" (b) to read as follows:

b) Except as provided for in Puc 2007 ~~T~~these rules shall not apply to municipalities operating municipal electric utilities under RSA 38, or to municipalities or counties providing electricity or aggregating within the boundaries of participating municipalities under RSA 53-E, or to utilities as defined in Puc 2002.24.

DEFINITIONS TO BE ADDED TO OR AMENDED IN PUC 2002:

Puc 2002.__ "Anonymized" means customer data presented in a way that removes information that can be used identify the individual customer that it pertains to, such that it does not constitute "individual customer data" as defined by RSA 363:37, I.

Puc 2002.__ "Committee" has the meaning set forth in RSA 53-E:2, IV, namely, "an electric aggregation committee established under RSA 53-E:6."

Puc 2002.__ "Community power aggregation (CPA)" means a municipal or county aggregation established pursuant to RSA 53-E to group retail electric customers to provide, broker, or contract for electric power supply and energy services for such customers, including a group of such entities operating jointly pursuant to RSA 53-E:3, II(b) and RSA 53-A.

Puc 2002.__ "Community power aggregator" has the meaning set forth in RSA 53-E:2, II, namely, "a municipality or county that engages in aggregation of electric customers within its boundaries."

Puc 2002.__ "CPA territory" means the municipality, municipalities, county, or counties served or proposed to be served by a community power aggregation.

Puc 2002.__ "Default Service" has the meaning set forth in RSA 374-F:2, namely, "electricity supply that is available to retail customers who are otherwise without an electricity supplier and are ineligible for transition service and is provided by electric distribution utilities under RSA 374-F:3, V or as an alterative, by municipal or county aggregators under RSA 53-E."

~~Puc 2002.__ "Default service supply solicitation" means the competitive solicitation process through which a utility procures wholesale power to supply its customers taking default service, initiated by the issuance of a request for proposals from prospective competitive wholesale suppliers.~~

Puc 2002.__ "Electronic Data interchange (EDI)" means a standard set of data transactions used by electric distribution companies and CEPS ***or CPAs serving as LSEs*** to send and receive data.

Puc 2002.__ "Enrollment" means the commencement of a customer's electricity supply service from a CEPS, ***a CPA serving as an LSE, or a CEPS serving a CPA under contract,*** effective on the meter read date described in Puc 2004.10(a) following successful EDI notification by a CEPS ***or CPA serving as an LSE*** to the utility.

Puc 2002.__ "Load Serving Entity (LSE)" means an entity that is registered with ISO-NE as a market participant and secures and sells electric energy and related services to serve the demand of end-use customers at the distribution level.

Commented [CB1]: Blue highlighting indicates new edits since 9/11/20 suggested edits

Commented [CB2]: This just addresses the need to amend the existing rule regarding application of the whole chapter.

Commented [CB3]: This definition is not necessary with CPC's proposed edits.

PART Puc 2007 COMMUNITY POWER AGGREGATIONS

Puc 2007.01 Notification of Formation of a Community Power Aggregation Committee.

(a) A municipality or county that forms a committee pursuant to RSA 53-E:6, I shall provide notice to the commission in writing and by email at the addresses provided in Puc 103.01(m) and pursuant to Puc 202.06, and also to the utility or utilities serving customers in such municipality or county at the addresses provided to the commission by utilities and posted on the commission website under (b) below.

(b) Each utility shall provide to the commission current contact information that can be posted on the commission website as to the person or persons and mailing or email address to be used for notices to the utility required under these rules and for requests for information under these rules .

(c) The notice required under (a) above shall be sent not less than 10 days before any request by the committee for aggregated load information from the utility or utilities serving customers in the municipality or county becomes effective.

(d~~e~~) The notice required under (a) above shall include the following:

(1) The name and address of the primary contact for the committee;

(2) The name, address, telephone number, and email address for the municipal or county official or employee who serves as the liaison or support person for the committee;

(3) Designation of person or persons identified under (1) or (2) above who are authorized to request information from the utility pursuant to Puc 2007.02; and

(~~3~~4) The URL of any website page maintained by or for the committee.

Puc 2007.02 Request for Load Information from Utilities.

(a) A committee may request aggregated load information for all electric customers located within the applicable municipality or county from each utility serving such customers by making an email or written request for such data to each such utility with a copy provided to the commission consistent with the requirements of Puc 202.06.

(b) Within 30 days following the date of a request made pursuant to (a) above, each utility shall provide the following load information for the customers it serves in the municipality or county:

(1) The most recent ~~12~~24 months of monthly load data for each customer rate class, aggregated and sorted by whether the customers were taking competitive service or default service for each such month;~~ and~~

(2) Customer counts in each rate class for each month, sorted by whether the customers were taking competitive service or default service for each such month~~.~~;

(3) Current counts of customers that participate in net metering in each rate class, sorted by whether the customers are taking competitive service or default service to the extent such data is readily available; and

(4) Current counts of residential customers on default service that participate in the electric assistance program.

Commented [CB4]: There should be no need for an NDA or cybersecurity review of a subdivision of the state for aggregated data as it can be expected to be publicly released as part of an aggregation plan. Also an NDA is unlikely to trump the requirements of RSA 91-A unless it can truly be otherwise claimed to be entitled to confidential treatment under 91-A.

Commented [CB5]: This should not require a month, especially following the 10 day advance notice from 2007.01. Utilities still CONCERNED

Commented [CB6R5]: Returned to staff proposed 30 days to address utility concern.

Commented [CB7]: Aggregated load data for more than the most recent 12 months is critical for understanding what the future seasonal load shapes might be after business and electricity consumption return to more normal levels and seasonal patterns. Monthly data, as opposed to just annual data, is likely to be valuable in developing an aggregation plan. For example, for the large customer class utility provided default service rates typically change every month. For the small customer class, the rate may be fixed for 6 months, but often the public default service filings provide the underlying monthly rates and the monthly loads to derive a load weighted average rate for the 6 month fixed rate. Monthly load data would allow a CPA planning committee to estimate load weighted average default service rates for their subset of default service customers that may be different from all of the utility's default service customers, and it could be valuable to understand material differences in monthly/seasonal load shapes.

(c) Load data shall include consumption in kWh~~, and where available, kW and kVA demand,~~ for each reported interval.

(d) No individual customer data as defined in RSA 363:37, I shall be provided to a committee in response to a request made pursuant to (a) above. If there are less than 4 distinct customers in any one rate class reporting group as specified in (b)(1) above, such load data shall be combined with the load of the most similar rate class or classes and shall be reported as the combined rate classes, provided the overall reporting group contains at least 4 distinct customers.

(e) A committee may request to have the data provided by the utility updated to the most recent month available, but not more frequently than once every 3 months after the initial request.

Puc 2007.03 Notification of Adoption of a Final Plan for an Aggregation Program.

(a) A municipality or county that approves a final community power aggregation plan, or revises such a plan to include an opt-out default service program pursuant to RSA 53-E:7, shall provide notice to the commission in writing and by email at the addresses provided in Puc 103.01(m) and pursuant to Puc 202.06, and also to the utility or utilities serving customers in such municipality or county.

(b) The notice required pursuant to (a) above shall be sent within 15 days following such approval by the legislative body of the municipality or county and prior to requesting customer names and address pursuant to Puc 2007.04.

(c) The notice shall include the following:

(1) A copy of the approved plan;

(2) The name, address, telephone number, and email address for the municipal or county employee or official who serves as official liaison or the responsible person for questions about the approved plan and who is authorized to request information from utilities under these rules; and

(3) The URL of any website page that is maintained for the CPA.

Puc 2007.04 Request for Anonymized Customer Specific Information from Utilities.

(a) After a municipality or county has filed its approved community power aggregation plan with the commission and each utility serving the CPA territory, each such utility shall provide to the municipality or county within 15 days of a request therefor the following anonymized customer specific load related information for all customers currently on default service provided by the utility within the CPA territory, sorted or identified by customer rate class:

(1) Individual capacity tags for the current power year, and, if known and readily available, the prior power year and the next power year,

(2) The most recent 12-24 months of load data in kWh for each reported interval;

(3) Whether the customer currently has an arrearage on their account, if they are on a payment plan, and the billing and arrearage history of each such customer for the past 12 months;

(4) The meter reading cycle for each customer meter;

Commented [CB8]: There probably should be some minimum threshold for aggregation to protect ICD from inadvertent disclosure and to have a standard way of reporting that load when there are very few customers in a particular rate class. The 4 customer minimum for aggregated data seems to be a standard adopted in some other states for a minimum # to provide multi-tenant building owners aggregated energy data without individual customer consent.

Commented [CB9R8]: Although this would require a quick manual review and possible adjustments by the utility, if even that seems too burdensome then the more granular data could be provided under an NDA and the municipality or county could be made responsible for such aggregation of data before any public release. Also, a 10 customer minimum for aggregation of residential customers could be applied instead of the 4 that could apply to non-residential.

Commented [CB10]: This information is important for CPAs assuming the role of default service provider to properly price supply options and is comparable to the information made available in Massachusetts to CCAs at this stage, except that in MA it is not anonymized or aggregated.

Commented [CB11R10]: Provision of individual data at this stage, like they do in Massachusetts, would be an acceptable alternative to the CPC. If needed the CPA could be required to aggregate any such data to the extent not held confidentially pursuant to RSA 363:38, according to minimum standards for the number of customers within any one rate class, e.g. at least 4 or 6 nonresidential and at least 10 residential sets of customer-specific data within any one rate class.

Commented [CB12]: Unlike others states with active community choice aggregation programs NH does not have a POR (Purchases of Receivables) option and the current waterfall payment structure places current CPA receivables behind all amounts due to the utility, unlike utility provided default service, which has equal priority with receivables otherwise due the utility.

(5) Whether the customer net meters and, if so, whether under standard (original) net energy metering terms or alternative net energy metering terms;

(6) Whether a customer is a group net metering host or a member with on-bill crediting if known and readily available;

(7) Whether a group net metered customer-generator operates as a low-moderate income solar project pursuant to RSA 362-F:2, X-a.

(8) The size in kW-AC, or if not known, the size in kW-DC, of any such net metered generation referenced in (5) above, if known and readily available; and

(9) The year and month such distributed generation was placed into service, if known and readily available;

(b) The information required to be provided pursuant to paragraph (a) above shall be provided in digital electronic format, such as a database or spreadsheet file, but not in the form of scanned images.

(c) No individual customer data as defined in RSA 363:37, I shall be provided to a CPA in response to a request made pursuant to (a) above. If there are less than 4 distinct customers in any one rate class reporting group for the data specified in subparagraphs (1)-(3) above, such customer data shall be combined with the customer data of the most similar rate class or classes and shall be reported as the combined rate classes, provided the overall reporting group contains at least 4 distinct customers.

(d) An approved CPA may request to have the data provided by the utility updated to the most recent month available, but not more frequently than once every 3 months after the initial request.

Puc 2007.05~~4~~ Request for Names, Addresses, and Account Numbers of Customers.

(a) After a municipality or county has filed its approved community power aggregation plan with the commission and each utility serving the CPA territory, each such utility shall provide to the municipality or county upon their request therefor the names and mailing addresses for every electric customer taking service within the municipality or county, and the utility account number and related meter number(s) or meter identification(s) for each metered load on default service within the CPA territory.

(b) The information required to be provided pursuant to (a) above shall be provided in digital electronic format, such as a database or spreadsheet file, but not in the form of scanned images.

(c) The information required to be provided pursuant to (a) above shall be provided within ~~30~~15 days of request therefor.

(d) The municipality or county may request to have such information provided by the utility updated to the most recent month available, but not more frequently than once every 3 months after the initial request.

Puc 2007.06~~5~~ Notification of CPA Commencement of Service and Rates.

(a) Each municipality or county initially implementing a community power aggregation plan shall provide written notice to the commission and to each utility serving customers within the CPA territory prior to the ~~commencement of transfer~~enrollment of any electric customers ~~to~~in the CPA.

Commented [CB13]: As an alternative to the rest of the language in this paragraph, the CPA could be required to aggregate any such data to the extent it is not held confidentially pursuant to RSA 363:38, according to minimum standards for the number of customers within any one rate class, e.g. at least 4 or 6 nonresidential and at least 10 residential sets of customer-specific data within any one rate class.

Commented [CB14]: This could be 10 distinct customers for residential and 4 for nonresidential.

Commented [CB15]: This notice could only be given at least 15 days after the notice required by Puc 2007.03(b), hence there would be at least 30 days advance notice to the utility of the need to prepare such a list, which should be plenty of time. Shortening this from 30 days to 15 primarily serves to provide the CPA with a reasonably current list for the requirement under RSA 53-E:7, II that requires mailing "written notification to each retail electric customer" within the jurisdiction. For the rule to conform to the statutory requirement, this lead time should be as short as is reasonably possible.

(b) The notice required pursuant to (a) above for any CPA to be operated on an opt-out basis shall be ~~sent not less than 60 days~~ provided prior to the commencement of service and the enrollment of any electric customers in the CPA by not less than: ~~the next default service supply solicitation to be conducted by any utility serving customers within the CPA territory subject to the CPA, which shall be the earlier of such dates if the CPA territory is served by more than one utility.~~

(1) 45 days if the commencement of service is to occur during the second half of a default service supply period of fixed or known rates of 6 months or more or if there is no distinct known or fixed rate default service supply period of 6 months or more; or

(2) 60 days if the commencement of service is to occur during the first half of a default service supply period of fixed or known rates of 6 months or more;

(c) When a CPA is served by more than one distribution utility the applicable minimum notice time under paragraph (b) above shall be that for the utility with the largest default service load within the CPA service area as most recently provided by the utilities for development of the aggregation plan pursuant to Puc 2007.02. Such load data and determination shall be included the CPA's approved aggregation plan. ~~In connection with the initial implementation of any CPA operated on an opt-out basis, no customers shall be transferred to the CPA prior to the date upon which new default service rates for any utility serving customers within the CPA territory have become effective.~~

(d) Within 10 business days of receipt of a CPA notification of commencement of service pursuant to paragraph (a) above the commission shall provide such CPA a secure link to the shopping comparison website maintained by the commission so the CPA can input rate information.

(e) Within 10 business days of receipt of the secure link provided by the commission pursuant to paragraph (d) above the CPA shall input information regarding the CPA's fixed rate opt-out default service rates and optional opt-in rates including variable pricing policies, charges, and key terms for residential and small commercial customers.

(f) Each operating CPA shall update the required information input pursuant to paragraph (e) above whenever it changes no less frequently than once per month.

Puc 2007.07~~6~~ Use of Electronic Data Interchange.

(a) Prior to the mailing to customers required under RSA 53-E:7, II, each CPA planning to use a CEPS to serve CPA customer loads shall confirm with the CEPS and each distribution utility serving the CPA territory the CEPS's ability to use EDI for automatic enrollment of default service customers in the CPA territory, excluding those that opt-out of the CPA, over the course of the CPA commencement month.

(b) Each CPA that will serve customer loads as an LSE, or its contracted service provider for customer enrollment, shall:

(1) Apply to and successfully complete the testing required to use each utility's EDI in the same manner and on the same terms as a CEPS; and

(2) If the CPA will provide alternative default service, demonstrate the ability to use EDI for automatic enrollment of default service customers in the CPA territory, excluding those customers that opt-out, over the course the course of the CPA commencement month.

Puc 2007.08~~7~~ Provision of Electricity Supply Service.

Commented [CB16]: See the accompanying letter that explains why shortening this requirement and de-linking it from utility default service supply solicitation is both reasonable and important to comply with statutory intents.

Commented [CB17]: "Default service supply period" could be a defined term, which would simplify these two subparagraphs.

Commented [CB18]: This covers two known situations: the NHEC that doesn't procure supply and rates on any fixed cycle (e.g. using ongoing portfolio management for default supply)and Unitil large C&I that take a pass-through of wholesale hourly rates that are adjusted monthly, so there isn't hedging risk over months. In both cases 45 notice of start of enrollment effective at next available meter reading cycle should be adequate.

Commented [CB19]: Paragraphs (d)-(f) are intended to mirror the Puc 2004.03(a) rule that applies to CEPs.

(a) CPA customers shall be served by one or more CEPS, or by the CPA as an LSE, or by a combination of the two, that provide all-requirements service to meet each of its customers' load~~with full requirements, load-following electricity supply service~~, which may include electricity supply provided by distributed generation or other distributed energy resources that are not participants in ISO-NE administered wholesale energy markets. For the balance of load requirements the CPA shall be responsible for the cost to deliver the associated capacity, energy, and ancillary services to a point or points on ISO-NE pooled transmission facilities and be responsible for any and all losses incurred on the local network transmission system and distribution system supplying load.

> **Commented [CB20]:** Addresses ambiguity and concern raised by FEL (Bart Fromuth)

(b) Each customer account served through the CPA shall be assigned to one CEPS or the CPA serving as an LSE for each utility meter reading cycle.

Puc 2007.09~~8~~ Application of Puc 2004 to CEPS Providing Electricity Supply to CPA Customers.

(a) This chapter shall apply to CEPS providing electricity supply service to CPA customers as their LSE, except as otherwise provided (b) below.

(b) Puc 2004 shall not apply to a CEPS if and only to the extent that it is providing electricity supply service to CPA customers, except as follows:

(1) Puc 2004.03(k), Puc 2004.05, Puc 2004.10(a), Puc 2004.12, Puc 2004.13, Puc 2004.15, Puc 2004.16, Puc 2004.17, Puc 2004.18, Puc 2004.19, and Puc 2004.20 shall apply to any such CEPS; and

(2) The CEPS shall be subject to any other provisions of Puc 2004 that are specified to apply to CEPS serving CPA customers in:

a. The approved final community power aggregation plan; or

b. The contract with the CEPS for electricity supply service to CPA customers.

Puc 2007.10~~09~~ Utility Services to CPAs. Electric distribution utilities shall provide services to CPAs on the same terms and conditions and at the same rates and charges as apply to CEPS except as otherwise provided by these rules or statute.

> **Commented [CB21]:** There seem to be some information services to be required by these rules (and necessary to implement RSA 53-E) that simply don't apply to CEPs, so this is a way of recognizing this.

Puc 2007.11~~0~~ County CPAs That Contain Municipalities ~~W~~with Adopted or Planned CPAs. As required under RSA 53-E:7, IV, municipal community power aggregations shall take priority or precedence over any county community power aggregations with respect to customer enrollment.

Puc 2007.12~~1~~ New Utility Service Applicants.

(a) Electric customers who apply for new service provided by a utility within the CPA territory of a CPA providing opt-out alternative default service pursuant to RSA 53-E:7, II, after the supply of customer names and addresses by the utility for the customer notification mailing required under RSA 53-E:7, II shall be given a choice of enrolling in default service provided by the utility, service provided by a CEPS, or service provided through the CPA.

> **Commented [CB22]:** This just recognizes this would not apply to a CPA that is only operating on an opt-in basis, which is possible, if not likely.

(b) The utility shall provide new customers with such choice information and provide supplier enrollment by the means specified in either (1) or (2) below:

(1) The utility shall inform all such new customers of CPA pricing and utility default service rates at the time those customers apply for service from the utility and shall enroll such new customers in their choice of supplier, or if such new customers do not make a choice of supplier, the utility shall enroll the customer in the default service of any geographically appropriate approved and operating CPA, or, if none exists, the utility provided default service; or~~.~~

~~(c) New customers who do not make such a choice shall be enrolled in the default service of any geographically appropriate approved aggregation, or, if none exists, the utility provided default service~~

(2) The utility shall, within 2 weeks of receipt of a completed application for new service, provide a copy of such application, along with the account number assigned to the new customer and any additional contact information the utility may have for the new customer, to the CPA providing default service at the location of the new service and the CPA shall inform the customer of applicable CPA and utility provided default service rates and the option to select a CEPs, and if the new customer does not make a choice of utility provided default service or CEPs service, the CPA shall enroll them in their alternative default service effective at next meter read cycle.

Puc 2007.13~~2~~ Termination of CPA. If a municipality or county intends to terminate a CPA, it shall provide written notice of the termination to the commission and to each utility serving customers in the CPA territory within 2 days of such decision and~~,~~ such notice to be provided not less than 90 days prior to the termination date. The CPA shall undertake all necessary EDI transactions to drop their customers and return them to utility provided default service consistent with the minimum 90 days advance notice. ~~, unless the CPA is operated on an opt-out basis, in which case the notice shall be provided not less than 90 days prior to the commencement of the next default service supply solicitation to be conducted by any utility serving customers within the CPA territory , which shall be the earlier of such dates if the CPA territory is served by more than one utility.~~

Puc 2007.14~~3~~ Unexpected Cessation of CPA Service. In the event of suspension from regional market participation by ISO-NE or another event causing the CPA to be unable to provide service to its customers within the CPA territory, the CPA shall provide immediate notice to the commission describing the market suspension or other event, the effective time of the inability to provide service, and the notice provided to customers of the timing and consequences of the cessation of CPA service.

Puc 2007.15~~4~~ Restart of an Aggregation Program After Termination. If a CPA is terminated, the municipality or county that sponsored the CPA shall not implement another community power aggregation plan for a period of ~~[~~12~~]~~ months following the effective date of such termination.

Puc 2007.16~~5~~ Sales Reporting. Each CPA that serves as an LSE for its participating customers shall submit a confidential quarterly sales report containing the information specified in Puc 2006.03, as and when such submission is required to be made by a CEPS pursuant to Puc 2003.04(a) and Puc 2006.03.

Puc 2007.17~~6~~ Renewable Portfolio Standard Reporting. Each CPA that serves as an LSE for its participating customers shall file, by July 1 of each year, the Annual Renewable Portfolio Standard Compliance Filing required by Puc 2503.03, and shall pay to the commission, by July 1 of each year, any alternative compliance payment due pursuant to Puc 2503.

Puc 2007.18~~7~~ Environmental Disclosure Label.

(a) Each CPA that serves as an LSE for its participating customers shall, not less frequently than once each year, provide each of its customers with an environmental disclosure label identifying the sources of its electric energy service and the environmental characteristics of such sources using the customer's preferred form of communication, as and when such actions are required of a CEPS pursuant to Puc 2004.05.

Commented [CB23]: This is essentially what the law requires today – though I think the 2nd option is also allowable by law, as well as a hybrid with CPAs and utilities both putting their default service rates on the PUC comparison website that new customers could be directed to, and if they don't make a choice (affirmative enrollment), then they simply get enrolled in the CPA default service effective to the time their service is turned on.

What is the lead time between when a new customer applies for service and when it is scheduled to become live? If an existing electric service is being transferred, I assume it is usually determined by the next meter read cycle, with some amount of lead time for scheduling.

Commented [CB24]: This requirement is only 60 days for CEPs under Puc 2004.15, which is proposed to apply to all CEPs serving CPAs as well by 2007.8 (b)(1). So, which would prevail if a CEP decides to discontinue serving CPA customers <90 days out and the CPA isn't sure they will continue without the CEP?

Commented [CB25]: This unduly burdensome and is contrary to the concept of a competitive marketplace for electricity supply. There is no such requirement for CEPs that are discontinuing service.

(b) Each CPA that serves as an LSE for its participating customers shall comply with all other requirements of Puc 2004.05, as and when such actions are required of a CEPS pursuant to Puc 2004.05.

Puc 2007.19~~8~~ Complaints and Dispute Resolution.

(a) The commission shall hear and decide complaints or disputes between committees, CPAs, and utilities, as well as complaints regarding a CPA's or utility's compliance with the requirements of RSA 53-E and this chapter.

(b) Complaints to the commission under this chapter shall be made pursuant to Puc 204, and, consistent with RSA 53-E:7, VI, shall not be subject to RSA 541-A:29 or RSA 541-A:29-a.

Puc 2007.20~~19~~ Historic Load and Billing Data. Once a utility customer has become a customer of a CPA, the utility shall provide to the CPA for each such customer:

(a) Not less than 12 months of historical monthly load data for each such customer, including consumption in kWh, and where available, kW and kVA demand;

(b) Individual customer data that allows the identification of each customer and association with the customer's individual load data, including, to the extent applicable and available:

(1) Name of customer;

(2) Name of customer contact, if different from customer name;

(3) Mailing address;

(4) Service address;

(5) Account number and related meter number(s) or meter identification(s);

(6) Home or operating company phone number;

Commented [CB26]: This and the next 9 items are all information the utility should have for some or all customers and be able to share with a CPA for the CPA's customers.

(7) Mobile phone number;

(8) Email address;

(9) Operating company;

(10) Billing account number;

(11) Preferred billing and communication method;

(12) Billing cycle;

(13) Meter number or numbers;

(14) Meter reading date or reading cycle;

(15) Form or type of meter reading;

(16) Historic for the previous 2 years, current power year, and forecasted next power year, if available, capacity tag information for the customer; and

(17) Current and historic status of the customer regarding:

a. whether the customer owns or purchases power from a distributed generation resource located behind the customer's meter, if known and readily available;

b. the size in kW-AC of any such distributed generation located behind the customer's meter, if known and readily available;

c. whether the customer net meters and, if so, whether under standard tariff terms or under alternative tariff terms;

d. whether the customer is a group net metering host or member with on-bill crediting;

e. whether the customer's distributed generation facility has been determined to be a low-moderate income community solar project;

f. whether the customer participates in the Liberty battery storage pilot program;

g. whether the customer is currently enrolled in the electric assistance program;

h. whether the customer is currently on a payment plan for arrearages; ~~and~~

i. the utility rate class of the customer; and

(~~c~~18) Customer billing data for the previous 12 months, including monthly arrearage balances.

Puc 2007.21- Enabling Meter Reading Authority and Access to Interval Meter Data.

(a) For the purpose of enabling meter reading authority pursuant to RSA 53-E:3, II(a)(4) and to enable the collection and use of interval meter data for daily load settlement purposes, including capacity tag allocation, the provision of energy services, and near real-time customer access to such data pursuant to RSA 53-E:4, IV for its customers a CPA may, upon request to and approval by the utility and approval by the commission:

(1) Propose and implement with the utility an arrangement to enable the CPA to directly read existing meters including those capable of reporting load data at intervals of hourly or more frequently;

(2) Propose and implement with the utility an arrangement to enable the CPA to have near real time access to meter data as it is collected and electronically stored by the utility;

(3) Contribute to the cost of utility provided meter upgrades to enable the collection of such interval meter data, by paying the incremental cost of such meter upgrades that are in excess of the then current cost of a standard replacement meter up to its annual budget for new and replacement meters;

(4) Propose to jointly own with the utility a new interval meter, which may include supporting communications equipment and systems, with the utility required to contribute not less than the cost of a standard replacement meter, up to its annual budget for new and replacement meters, with ownership shares to be proportional to the relative cost contributions of the CPA and the utility; or

Commented [CB27]: This is a complete re-write of previous sections Puc 2007.20 Enabling Access to Interval Meter Data and Puc 2007.21 Procedure for Approval of CPA Contribution to or Ownership Interest in Interval Meter.

Commented [CB28]: **53-E:3 Municipal and County Authorities. –**
Any municipality or county may: ...
II. (a) Enter into agreements and provide for:
(1) The supply of electric power...
(4) Meter reading. ...

Commented [CB29]: **53-E:4 Regulation. – …**
IV. For the purpose of obtaining interval meter data for load settlement, the provision of energy services, and near real-time customer access to such data, a municipal and county aggregator may contribute to the cost of electric utility provided meter upgrades, jointly own revenue grade meters with an electric utility, or provide its own revenue grade electric meter, which would be in addition to a utility provided meter, subject to the commission finding in the public good and approval of the terms and conditions for such arrangements, including sharing or transfer of meter data from and to the electric distribution utility.

(5) Install a secondary revenue grade meter provided by the CPA that is in addition to the meter installed and maintained by the utility, including arrangements for the CPA to share or transfer data from such meters to the utility for load settlement purposes.

(b) The utility and CPA shall jointly file with the commission any agreement to implement any of the approaches provided for in paragraph (a) for review through an adjudicated proceeding.

(c) The commission shall approve any such agreement if it finds it is for the public good and the terms and conditions are reasonable.

(d) If a CPA and a utility cannot agree to terms and conditions for enabling meter reading authority or access to interval meter data, the CPA may submit a proposal for such implementation to the commission for adjudication, and the commission shall approve the proposal if it finds that the proposal is in for the public good, pursuant to RSA 53-E:4, IV.

Puc 2007.22 Net Metering by CPAs.

(a) CPAs shall determine the terms, conditions, and prices under which they agree to provide generation supply to and credit, as an offset to supply, or purchase the generation output exported to the distribution grid from CPA customers with customer-sited distributed generation.

(b) Pursuant to RSA 362-A:9, II, such generation output shall be accounted for as a reduction to the CPA customers' electricity supplier's wholesale load obligation for energy supply as a load serving entity, net of any applicable line loss adjustments, as approved by the commission.

(c) CPA customers with customer-sited distributed generation who are net metered shall net meter pursuant to the applicable utility tariff with respect to transmission and distribution service charges and credits.

Puc 2007.23 Consolidated Billing.

(a) For utility provided consolidated billing, a CPA shall have the option to provide lump sum charges or credits for electricity supply and related services through the EDI with billing details, including all billing determinants, provided directly to the customer by the CPA.

(b) A CPA may propose to provide CPA consolidated billing and collection services, pursuant to RSA 53-E:3-a, through an adjudicated proceeding.

Puc 2007.24 Partial Payments Under Consolidated Billing. In any consolidated billing involving charges by or on behalf of both a utility and a CPA, when a customer makes a payment for less than the full amount billed, such payment shall be applied as follows:

(a) First to any outstanding customer loans or deposit obligations with the utility or the CPA, in proportion to the balance due on such obligations;

(b) Next to any utility or CPA current payment arrangement obligations, in proportion to the balance due on such obligations;

(c) Next to any utility or CPA budget billing arrangement obligations, in proportion to the balance due on such obligations;

Commented [CB30]: This is important to enable additional authorities of CPAs under the statute, including possible opt-in supply rates, such as TVR/TOU and dynamic rates (e.g. DAP & RTP) that the utilities are not capable of computing but should be capable of billing as a lump sum charge or credit. This especially important because EAP credits cannot currently be given to eligible customers except through consolidated billing, so CPAs may have to discriminate against those customers in money saving opt-in opportunities.
The original EDI materials on the PUC website indicate that there are optional dormant fields within the EDI architecture that could be activated to enable this. Under "Usage Billing Invoice" on this pg.: https://www.puc.nh.gov/Electric/edi.htm there is a document called "ts810" that includes on pp. 48-49 a data "segment" called "SAC" which apparently stand for "**S**ervice, promotion, **A**llowance, or **C**harge" where an allowance or promotion could be a credit on a bill. At this location the Segment is described as "Allowance or Charge Information – Current Amount." The purpose is described as "[t]o request or identify a service, promotion, allowance, or charge; to specify the amount or percentage for the service, promotion, allowance, or charge." There are specific fields to allow identification of various charges or credits and allows the specification of a monetary amount in a field called "SAC05". There are a variety of data fields and additional segments that seem to allow for supplier specification of lump sum charges or credits as well as by percentage and by units with a unit price, including for a 3 part TOU rate structure and for "Current Customer Charges" on pp.48-63. If the supplier could use these fields they could create a unique charge (or credit)for each customer, with an identifier that would allow the CPA to use utility consolidated billing for a variety of new services that could be offered EAP customers.

(d) Next to the aged accounts receivable of any utility and aggregator or competitive electricity supplier serving an aggregation, in proportion to the balance due on such aged accounts receivable;

(e) Next to the aged accounts receivable of any other competitive electricity supplier;

(f) Next to the current charges of any utility and aggregator or competitive electricity supplier serving an aggregation, in proportion to the balance due on such current charges; and

(f) Finally, to any other charges due on the utility bill as may be provided for by the utility tariff.

Commented [CB31]: This is new and is the missing piece I mentioned during the stakeholder session on 11/12/20.