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## **Advancing Community Benefits through Open Access to the Electric System**

CPCNH supports non-discriminatory, open access to the electric system for wholesale and retail transactions. Ensuring the equitable treatment of all customers – whether on competitive supply, Community Power default service, or utility default service – is of paramount importance in achieving an affordable, equitable, and market-based sustainable energy transition in New Hampshire

### **CPCNH supports actions that:**

- ✦ Support broad customer and community choices and control over energy decisions through market competition to promote innovation and an affordable energy transition.
- ✦ Level the playing field with utilities by unlocking retail market price signals, including transmission and generation capacity, to enable the competitive market to offer innovative rate designs and value-added services that lower costs to customers and benefit all New Hampshire ratepayers.
- ✦ Modernize wholesale load settlement to unlock the value of Distributed Energy Resources (DERs) and enable market competition.
- ✦ Expand municipalities' ability to install and use local, community-scale renewable energy sources and have the option to use the energy produced from these facilities to offset the Community Power Aggregation (CPA) as a whole.
- ✦ Streamline interconnection processes for DERs, inclusive of customer energy storage, through statewide rules and practices to ensure greater transparency, predictability, and accountability.
- ✦ Leverage the buying power of CPCNH members to deliver more cost-effective, clean, and reliable energy solutions available for our customers.
- ✦ Ensure that the costs of power and electricity delivery services are fairly allocated to customers.
- ✦ Ensure that energy usage data (inclusive of energy export data) is available in sufficient detail to enable informed investment and decision making and aid in CPCNH's ability to innovate and provide customers with value-added products and services beyond that of simply commodity at flat rates.
- ✦ Support seamless data access and consolidated billing options for customers who are served by the competitive market.

- ⚡ Support clarification that the PUC can enable storage as part of net energy metering tariffs.
- ⚡ Authorize interval and/or smart metering infrastructure for new DER customers to maximize value through competition.
- ⚡ Support a 20-year term for new net metered Distributed Generation (DG) projects while the PUC continues to review and refine net energy metering tariffs.
- ⚡ Protect a competitive supply market by supporting legislation to course correct utility default service supply procurements and cost recovery of variances.
- ⚡ Evolve utility regulatory models to align with public policy goals.

### **CPCNH opposes actions that:**

- ⚡ Restrict or foreclose the existing authority and ability of CPAs to access the electric system under RSA 53-E, RSA 362-A, and RSA 374-F:2.
- ⚡ Impede CPCNH's ability to serve its customers and launch new CPA programs.
- ⚡ Reverse decades of state policy to promote competition in the electricity markets by expanding the utility monopoly over retail market functions.
- ⚡ Socialize and/or shift costs from utility default service onto competitive supply and CPA default service.

## **Increasing Innovation through Local Control, Equity & Community Development**

CPCNH supports protecting local control and autonomy for its CPA Members, especially with regards to finances, power procurement, reliability, customer data and billing services, and the development of local projects and customer programs. This will safeguard CPCNH's ability to innovate and create new value for its communities and customers. Community Power and competitive supply must, at minimum, have parity with electric distribution utilities in their ability to provide innovative and value-added retail energy products and services to customers, including but not limited to leveraging the full value stack of local, community-scale energy generation and storage projects to serve Community Power Aggregations and time-differential rates to incentivize energy optimization.

### **CPCNH supports actions that:**

- ⚡ Allow communities to promote renewable and DERs development, energy efficiency programs, price stability, access to innovative energy products, services, and rates, and local economic benefits through local control and autonomy.
- ⚡ Expand competitive behind-the-meter DER programs to lower costs to customers, enhance system optimization, create local employment, and promote environmental sustainability.

- ⚡ Ensure that power generators, regardless of their size, are fairly and accurately compensated for the power produced and costs avoided.
- ⚡ Support market adoption of advanced technologies, such as energy storage, and through competitive means, incentivize them to produce energy during times of peak demand and/or use energy during times when supply is plentiful and cheap.
- ⚡ Authorize the development of community microgrids.
- ⚡ Encourage adoption of Transactive Energy rate programs, such as for the management of electric vehicle charging, that maximize ratepayer value and system optimization while promoting customer choice and control.
- ⚡ Enable municipalities to enact measures that promote local energy and land use systems that are both economically and environmentally sustainable.
- ⚡ Protect and preserve local natural resources and public infrastructure, build community resilience, and foster adaptation to climate change and mitigates its risks.
- ⚡ Incentivize the efficient and cost-effective build-out of zero-emission or electric vehicle charging infrastructure.
- ⚡ Enable municipalities at their discretion to adopt more recent editions of national/international building energy and electrical codes than the current state-adopted editions.
- ⚡ Adopt more recent editions of the national/international building energy and electrical codes after review and recommendation by the Building Code Review Board.

### **CPCNH opposes actions that:**

- ⚡ Detract from existing CPA authority under RSA 53-E, RSA 53-A, RSA 53-F, RSA 374- D, RSA 38-D, RSA 33-B, RSA 674:2, and RSA 155-A:2, V.

## **Enforcement of Laws, Market Rules, and Regulations**

CPCNH supports full compliance with federal and state statutory requirements, rules, and regulations by electric distribution utilities and market participants to accelerate innovation in a way that maximizes customer and community choice through market-based solutions.

customers, including but not limited to those who elect to participate in net energy metering and time-varying electric rates.

### **CPCNH supports actions that:**

- ⚡ Ensure that electric utilities are in full compliance with RSA 53-E and the PUC Municipal and County Aggregation rules (Puc 2200 rules).
- ⚡ Ensure that the competitive market (CPAs, competitive suppliers, and distributed energy resource aggregators) are able to receive accurate and timely customer billing determinants so that they may bill their customers either on a separate or consolidated billing basis.
- ⚡ Modernize utility-administered load settlement systems and processes so that suppliers (including CPAs) receive commensurate credit for the net energy exports of customer generators and ensure compliance with RSA 362-A:9, II.
- ⚡ Protect CPCNH's financial sustainability, its ability to be responsive to local priorities, and its ability to promote the common good and general welfare by supporting the economic vitality and prosperity of local communities.
- ⚡ Maintain and expand cost-effective energy efficiency programs that benefit all NH ratepayers.
- ⚡ Clarify the role and responsibilities of the PUC vs. the DOE and that due process rights be maintained through adjudication at the PUC.

### **CPCNH opposes actions that:**

- ⚡ Weakens or eliminates CPA rules and regulations applicable to EDUs and market participants.
- ⚡ Weakens or eliminates the independence of the Office of Consumer Advocate on behalf of residential ratepayers in NH.

### **Administrative Authority:**

Individuals who should be authorized by the Board to field inquiries and/or to engage with policymakers, the media, and the public on matters related to the CPCNH Legislative & Policy Platform are:

CPCNH Chair: Clifton C. Below – [Clifton.Below@CommunityPowerNH.gov](mailto:Clifton.Below@CommunityPowerNH.gov)

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