EXETER COMMUNITY POWER PROGRAM

EXETER ELECTRIC AGGREGATION PLAN

December 29, 2021

As Approved by the Exeter voters at Town Meeting on February 5, 2022.
# TABLE OF CONTENTS

1. **INTRODUCTION** ........................................................................................................... 4
2. **EXETER COMMUNITY POWER: PURPOSE, GOALS AND OBJECTIVES** .......................... 6
3. **IMPLEMENTING COMMUNITY POWER IN EXETER** .......................................................... 7
   A. Requirements per RSA 53-E ....................................................................................... 7
   B. Proposed Timeline for Implementation .................................................................. 9
   C. Parameters of Implementation ............................................................................... 9
4. **PROGRAM ORGANIZATION AND ADMINISTRATION** .................................................. 10
   A. Organizational Structure ..................................................................................... 10
   B. Administration ....................................................................................................... 12
   C. Methods for Entering into and Terminating Agreements ..................................... 12
   D. Termination of the Community Power Program .................................................... 12
5. **CUSTOMER PARTICIPATION** ....................................................................................... 13
   A. Notification and Enrollment .................................................................................. 13
   B. New Customers ....................................................................................................... 14
   C. Opting-out of Exeter Community Power ............................................................... 14
   D. Rights and Responsibilities of Program Participants ............................................ 14
   E. Customer Data Privacy .......................................................................................... 14
   F. Electric Assistance Program Eligibility ................................................................. 15
   G. Universal Access, Reliability and Equitable Treatment for Customers ................ 15
   H. Education and Outreach ....................................................................................... 15
6. **OPERATION AND FUNDING** ...................................................................................... 17
   A. Operations .............................................................................................................. 17
   B. Costs, Funding and Rate Setting ............................................................................ 18
7. **PLANNED PRODUCT OPTIONS FOR ELECTRICITY SUPPLY** ................................... 19
   A. General Approach .................................................................................................. 19
   B. Planned Initial Electric Supply Options ................................................................ 19
   C. Renewable Portfolio Standard Requirements ...................................................... 20
8. **INVENTORY OF CUSTOMER ELECTRIC DEMAND IN EXETER** ............................... 20
9. **RELATIONSHIP WITH COMMUNITY POWER COALITION OF NEW HAMPshire (CPCNH)** 21
10. **NET METERING COMPENSATION** ............................................................................ 22
11. **PUBLIC INPUT PROCESS** .......................................................................................... 23
12. **AMENDING THE ELECTRIC AGGREGATION PLAN** ................................................... 23
13. APPENDICIES ..................................................................................................................... 24
APPENDIX 1: COMMUNITY POWER ENABLING STATUTES AND AMENDMENTS .................. 25
APPENDIX 2: PUBLIC INFORMATION MATERIALS ................................................................. 26
APPENDIX 3: COMMUNITY POWER SURVEY ......................................................................... 27
APPENDIX 4: EXETER COMMUNITY POWER QUESTION AND ANSWERS SCRIPT ..................... 28
APPENDIX 5: PUBLIC HEARING NOTICE ................................................................................. 29
APPENDIX 6: OVERVIEW OF THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE (CPCNH) .... 30
APPENDIX 7: AVAILABLE UTILITY DATA ................................................................................. 31
1. Introduction

As described in this document, the Town of Exeter is developing a Community Power Aggregation Program to provide expanded choice for electric power supply and services for residential and commercial electric customers within the community. This document represents the Energy Aggregation Plan for the Town of Exeter as prescribed by RSA 53:E:6. The Plan has been prepared by the Exeter Community Power Aggregation Committee which was established by the Select Board in May 2021. It describes the purpose of the program, how it will be organized, implemented and operated. It is subject to approval by the Exeter Community Power Aggregation Committee and submission by the Select Board to Town Meeting for adoption by a majority of those present and voting.

What is Community Power Aggregation?

Community Power Aggregation (CPA) refers to the grouping of retail electric customers within a municipality or group of municipalities to provide, broker or contract for electric power supply and related services for those customers. Communities typically implement CPA programs for the sake of cost savings, environmental sustainability, sourcing electricity from local energy sources or some combination of these. With aggregation, Exeter has the potential to offer a wider choice of energy supply options and innovative services to its residents and business, including choices that include a larger proportion of renewable energy.

Community power aggregation programs only change the sources of electricity used to supply the community, and do NOT change how electricity is delivered over the transmission or distribution grid. In Exeter’s case, Unitil will remain the utility that is responsible for maintaining the distribution grid and delivering electricity purchased by the program to participating customers. The difference is that the source of the electricity will be chosen by the CPA rather than by Unitil’s default energy provider. Customers will have the option to not participate in Exeter’s program and continue meeting their electricity needs either through Unitil’s default electricity supplier or through a third-party competitive supplier. At the present time we estimate that between 8-10% of residential electricity customers and nearly 40% of commercial and industrial customers in Unitil’s service area already choose to purchase their electricity supply through a third party and do not use the utility default supply. The adoption of an Exeter CPA will have no effect on those customers, other than providing them with the option to request to “opt-in” to the program. Details about how customers would participate in Exeter community Power are found in Section 5 of this document.

Why Now?

Community Power Aggregation is not new to New Hampshire and has in fact been allowed since 1996 when RSA 53-E and other statutes associated with electric utility restructuring were enacted. While allowed since then, community power programs have not been used successfully in New Hampshire because of impediments that existed in how the aggregation could be implemented. Those impediments made it difficult to reach the critical mass of customers necessary to establish competitive electric supply contracts. In 2019, changes were made to RSA 53-E that allowed programs to be established under an “opt-out” basis, meaning the community power program can now be set as the default energy source for customers currently receiving the Unitil default energy service unless they choose otherwise. Since this change numerous communities in New
Hampshire, like Exeter, have started to work on developing community power and a statewide coalition of municipalities has formed to facilitate this development (the “Community Power Coalition of New Hampshire”). Responding to this new opportunity, and upon recommendation from the Exeter Energy Committee, the Select Board charged the Exeter Community Power Aggregation Committee with evaluating the advisability of, and preparing a plan for, implementing community power in Exeter.

Approval Process for Exeter’s Community Power Aggregation Plan

This Electric Aggregation Plan was developed by the Electric Aggregation Committee with due input from the public, as required under RSA 53-E. Public hearings were held on November 29th and December 13th, 2021. (See Appendix for Public Hearing Notice.)

The Electric Aggregation Committee has determined that this Plan satisfies applicable statutory requirements and is in the best, long-term interest of the Town and its residents, businesses, and other ratepayers.

Adoption of this Plan, which is subject to approval by a majority of those present and voting at Town Meeting, will establish Exeter Community Power as an approved electric aggregation program with statutory authorities defined under RSA 53-E:3, to be exercised with due oversight and local governance, as described herein, and will authorize the Exeter Select Board to arrange to procure the necessary professional services and power supplies to implement Exeter Community Power.

Implementation Steps

If this Plan is adopted at Town Meeting, the Select Board and Committee will begin work on implementing the program. This will involve a number of steps, including:

- Submitting the Plan for approval by the Public Utilities Commission, and to Unutil and the Office of the Public Advocate on the same day;
- Jointly soliciting and contracting for third-party services, electricity supply and staff support to launch and operate the Community Power programs through the Community Power Coalition of New Hampshire (CPCNH), or, seeking proposals and contracting for the necessary services, staff support and energy supply sources independently; and
- Developing and publicizing community power program details for customers, including supply alternatives, rate offerings and opt-out procedures.

As the program develops three things will remain constant: (1) Unutil will continue to be our utility, meaning they will continue to deliver electricity to customers, own and operate the distribution system (poles, wires, transformers, substations, etc.) and in most cases, provide account and billing services. (2) Participating in the Exeter Community Power will be completely voluntary. After the electricity rates to be offered under the program are established, customers will be notified and may choose to opt-out of the program, staying with Unutil’s default energy service. (3) Any costs associated with operating the program will be incorporated into rates paid by Exeter Community Power customers only and will not be passed on to customers who choose to opt-out of the program. If it is determined before the program is launched that Exeter Community Power will be unable to offer default electric rates that are initially lower than or competitive with the fixed energy
service charge rates offered by Unitil for residential and general service customers (rate schedules D and GS-2), then implementation of the program will not move forward. The program will not launch unless and until those conditions change.

2. Exeter Community Power: Purpose, Goals and Objectives

For at least the last 10 years, the Town of Exeter has contracted for its municipal energy supply through a municipal energy broker, achieving more stable and often lower rates and access to a broader choice of energy sources and suppliers. For example, with the Town’s most recent contract with energy supplier ENGIE LLC, signed in May 2021, the Town will be paying 7.45 cents/kWh whereas as of December 2021 the utility default energy service rate for small to medium non-residential customers has increased from 6 cents/kWh to 15.4 cents/kWh and the residential rate has increased from 7.1 cents/kWh to 17.52 cents/kWh for the next six months due to a spike in energy supply costs. Under Community Power, the same opportunity to seek out more advantageous energy supply contracts can be extended to the entire customer base of the Town.

The purpose of the Community Power Aggregation in Exeter is to allow the Town to aggregate retail electric customers to provide more competitive access to competitive supplies of electricity and related services. The intended result will be to offer more customers greater choice to select energy sources, especially renewable sources, at more competitive rates than currently available.

The primary goals of the program are as follows:

- Expand and accelerate the use of renewable electric energy in Exeter by making such sources more accessible and affordable to all electric energy customers;
- Facilitate the development of and access to local renewable energy projects; and
- Facilitate the development of innovative energy services and programs available to residents and businesses including smart meters, distributed storage and energy efficiency programs, EV charging, and training and education programs.

These goals are supported by the following objectives:

- **Choice and Access.** Expanded choice and access to energy suppliers: Most customers presently do not take advantage of the existing option to choose among energy suppliers. The Exeter Community Power Aggregation program will create readily accessible options for customers to choose from at competitive rates;

- **Regional and Statewide Collaboration.** Collaborate with other municipalities regionally and statewide to expand the aggregation market, share services and expertise, and develop priority projects;

- **Affordable Renewable Energy.** Through access to larger aggregation markets, improve affordability of renewable energy supply options;
• **Partnership with Unitil.** Create a strong collaborative partnership with Unitil in developing and delivering innovative programs and services;

• **Fiscal Stability.** Ensure fiscal stability through robust energy supply risk management and by establishing strong financial reserves funded through program revenues.

• **Energy Resilience:** Over time, Exeter Community Power will support the development of innovative local energy projects to improve resiliency in power supply. These may include residential battery / back-up power projects, independent electric vehicle charging networks and community microgrids at critical facilities; and

• **Prioritize Clean Energy.** Exeter Community Power will prioritize the development of cost-effective projects that promote the use and development of renewable energy, including:
  
  • Partnering with businesses and towns in the region to develop renewable energy projects, storage facilities, EV charging stations networks, etc.
  
  • Support individual residential and business customers in adopting new clean energy technologies and reducing energy consumption.

### 3. Implementing Community Power in Exeter

The basic process for implementing Community Power Aggregation in New Hampshire is established under RSA 53-E, titled *Aggregation of Electric Customers by Municipalities and Counties*. The law outlines both the steps that are used to establish a community power program in New Hampshire, and the minimum standards that such programs must meet.

**A. Requirements per RSA 53-E**

At a minimum, the following steps are cited in the statute:

1. The governing body (Select Board in Exeter) may form an electric aggregation committee.

2. The aggregation committee drafts a community power aggregation plan, which must:

   2.1. Provide for universal access, reliability, and equitable treatment of all classes of customers subject to any differences arising from varying opportunities, tariffs, and arrangements between different electric distribution utilities in their respective franchise territories;

   2.2. Meet, at a minimum, the basic environmental and service standards established by the Public Utilities Commission and other applicable agencies and laws and rules concerning the provision of service under Community Power; and

   2.3. Detail the following elements: organizational structure; operations and funding; rate setting and other costs; whether program established as op-in or opt-out; method for entering and terminating
agreements; rights and responsibilities of program participants; how customer net-metering is
accounted and compensated; how eligible CPA customers may receive discounted services; how the
program may be terminated.

3. As part of the planning process the aggregation committee must solicit public input and hold public
hearings.

4. The aggregation committee must determine that the plan is in the best long-term interest of the
municipality and its ratepayers.

5. The Select Board may choose to submit the final community power aggregation plan to Town Meeting for
adoption.

6. Once adopted, if the Plan calls for the ‘opt-out’ of the program alternative default service, the municipality
must mail written notification to all affected utility customers including description of the program,
implication and their rights and responsibilities as participants. The notification must be made at least 30
days before the program begins.

7. A public information meeting must be held to explain the program and answer questions (held within 15
days of above notification).

8. Customers must be afforded the right to opt-out of the power aggregation program’s alternative default
service anytime within 30 days of notification of rates of such service.

In addition to complying with this process, the Plan must meet certain criteria. As noted, if designed as opt-
out, affected customers must be given the right to opt-out within 30 days of notification of the rate of the
alternative service. Customers on the utility’s default service that do not opt-out will be automatically enrolled
in the new community power aggregation program’s default service. They may also choose alternatives to the
default supply that Exeter Community Power may offer, such as ones with a higher renewable energy content.
Customers that already receive service from a competitive energy supplier will not be automatically enrolled in
Exeter’s program, but may request to opt-in if they choose and if allowed under the contract terms of their
existing supplier agreement. Customers that are new to the utility after the initial program launch (e.g., new
customers) will have the choice of enrolling in either the utility default service or the community aggregation
program’s default service. The law also addresses important cost sharing and confidentiality issues. The plan
must ensure that customers who do not participate in the aggregation program are not responsible for any
costs associated with the program. The Town may, however, operate the program as a self-supporting
enterprise and additionally has the option of using revenue bonds to support costs, subject to separate voter
approval. Customer data must be treated as confidential and private and not subject to public disclosure
under the right to know law (91-A).

This Plan is designed to be fully compliant with the requirements of RSA 53-E and consistent with industry best
practices. Lastly, while the Public Utilities Commission has not yet adopted CPA Administrative Rules, this plan
commits Exeter Community Power to complying with such rules (once adopted) along with any additional
environmental and service standards established by the Public Utilities Commission and other applicable
agencies and laws and rules concerning the provision of service under Community Power.
B. Proposed Timeline for Implementation

The following chart portrays the approximate timeline for the development and implementation of Exeter Community Power. It assumes that the Exeter Select Board determines that the Plan be submitted to Town Meeting for approval at this coming March 2022 or at a subsequent Town Meeting. If approved at Town Meeting the program’s implementation will then depend on when the Public Utilities Commission adopts the required rules for Community Power Aggregation and approves Exeter’s Community Power Program as presented.

PROPOSED TIMELINE

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>ECPAC Established</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Information Material prepared</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community Survey</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>&gt;&gt;&gt;&gt;&gt;</td>
</tr>
<tr>
<td>Obtain Aggregate Utility Data</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Draft Plan Developed</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Informational Meetings</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plan Approved by ECPAC and Presented to BOS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plan Presented for Adopted at Town Meeting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Implementation*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>&gt;&gt;&gt;&gt;&gt;</td>
</tr>
</tbody>
</table>

* This timeline will depend on PUC approval of Exeter’s program and when CPA Administrative Rules are adopted.

C. Parameters of Implementation

The Exeter Community Power Program will adhere to implementation parameters as outlined below. The program will proceed with its launch only if it is able to offer default rates that are initially lower than or competitive with the fixed energy service charge rates offered by Unitil for residential and general service customers (rate schedules D and GS-2). Thereafter, the program will:

• Serve as the default electricity supplier for all customers on a default “opt-out” basis;

• Offer innovative services and generation rates to customers on an "opt-in" or "opt-up" basis (such as 100% renewable premium products, time-varying rates and Net Energy Metering generation credits for customers with solar photovoltaics);
• Operate on a competitive basis, in that customers may choose to switch between Exeter Community Power, service provided by competitive electric power suppliers, and utility-provided default service; and
• Be self-funded through revenues generated by participating customers (the Town will not use taxes to cover program expenses).

4. Program Organization and Administration

Upon approval of this plan by adoption at Town Meeting, Exeter Community Power will be authorized to arrange for the provision of electricity and related services to customers within the Town. As detailed in Section 5, customers currently receiving power through Unitil’s default service will be automatically enrolled in Exeter Community Power unless they choose to opt-out, and customers on competitive supply may request to opt-in to the program. The distribution of the purchased electricity will continue to be the responsibility of Unitil and the costs of distribution and related services will be paid to Unitil.

A. Organizational Structure

• Town Meeting: In accordance with RSA 53-E:7, the Exeter Town Meeting, as the Legislative Body for the municipality, will, by majority approval of those present and voting, decide whether to adopt the Community Aggregation Plan and thereby authorize the establishment of the Exeter Community Power Program. A Warrant Article pertaining to this question will be prepared by the Select Board to be included in the Town Meeting Warrant for the Exeter Energy Aggregation Plan.

• Exeter Community Power Aggregation Committee (ECPAC): Within parameters established by the Select Board, the Aggregation Committee will provide advisory support to the Town as to the ongoing operation of the program, power procurement options, interactions with service providers and overall performance of the program. The Committee may also make recommendations to the Select Board regarding participation in the Community Power Coalition of New Hampshire (CPCNH) and regarding entering into such agreements necessary to implement the program. Additionally, the Select Board may direct the Electric Aggregation Committee to continue to hold meetings for the purpose of providing community input.

• Select Board: The Exeter Select Board will have overall responsibility for the Exeter Community Power Program, including oversight and overall governance and will be authorized to contract for the necessary services and power supplies to implement and operate the program, set customer rates prior to program launch and continue to provide oversight over the program thereafter.

After consultation with the Town Manager and Exeter Community Power Aggregation Committee, the Select Board may (1) decide to conduct a competitive solicitation to hire a Community Power Broker / Service Provider, and may also collaborate with other interested municipalities to conduct this solicitation or (2) determine that the public interest is best served by participating fully in the Community Power Coalition of New Hampshire (CPCNH) to provide for the launch and operation of Exeter Community Power.
These two options have different organizational structures, as summarized below.

**Under the Community Power Broker / Service Provider option:**

- **Town Manager:** If so designated by the Select Board, the Town Manager (or their designee) would be responsible for carrying out a competitive solicitation process, and may coordinate with other interested municipalities to conduct a joint solicitation, to hire a Community Power Broker / Service Provider. Thereafter, the Town Manager would provide management oversight of the Exeter Community Power program, including direct oversight of the contracts for power purchasing, customer services, utility relations and fiscal management.

- **Community Power Broker / Service Provider:** The broker / service provider would manage certain Program activities under the direction of the Town Manager or designee. Their responsibilities would include, among others, coordinating and interacting with Unitil, developing and implementing customer communication and education activities, providing periodic reports to the Town and negotiating an Electric Services Agreement (ESA) with a Competitive Electric Power Supplier (CEPS).

- **Competitive Electric Power Supplier (CEPS):** The Competitive Supplier would be relied upon to provide all-requirements electricity for the program, along with customer services including staffing web and telephone based services, and would fulfill other responsibilities as detailed in the Electric Services Agreement (ESA), under terms deemed reasonable and appropriate for the retail electric customers by the Town Manager.

**Under the Community Power New Hampshire (CPCNH) option:**

- **Exeter’s appointed CPCNH Member Representative** (currently, members of the Select Board and ECPAC) would continue to serve on the Coalition's Board of Directors to help oversee the start-up and operation of the agency, provide input regarding the Coalition’s public advocacy on matters of policy and regulation, provide feedback and direction to the Coalition’s service providers and staff as operations and customer services evolve over time, and report back regularly regarding the performance of Exeter Community Power and on any matter that warrants attention or requires action by the Select Board.

- **The Select Board** would review and approve the CPCNH Member Cost Sharing Agreement (which would specify the Town’s choice of services that Exeter Community Power would rely on CPCNH to provide) along with the Energy Risk Management and Financial Reserves Policy prepared by CPCNH (which would govern the program’s power procurement and rate-setting decisions). The Select Board may also delegate certain decision-making authorities to the Town Manager and/or Exeter’s appointed Member Representative, from time to time, as required to carry out their oversight responsibilities on behalf of Exeter Community Power.

- **The Community Power Coalition of New Hampshire** would issue a competitive solicitation for the services and credit support necessary to operate the new power agency and would thereafter be relied upon to procure electricity and provide all the services required to launch and operate Exeter
Community Power (alongside the programs of other participating municipalities across the state). Note that the Coalition would manage Exeter’s power supply in accordance with the aforementioned agreement and policy approved by the Select Board (which would, for example, stipulate the Town’s choice of how to balance considerations of cost versus higher renewable power content).

- **The Community Power Coalition of New Hampshire’s Board of Directors** would govern the power agency to ensure that the power agency provides the services necessary to carry out each of its members stated policy requirements, such as: increased renewable and local power sources, competitive rates, the accrual of financial reserves, and the promulgation of local programs. The Coalition’s Board would carry out its responsibilities in accordance with the processes specified in the Coalition’s Joint Powers Agreement, including by establishing a number of committees (also composed of Member Representatives) that meet regularly to provide additional oversight over specific areas of focus — such as the Executive Committee, Finance Committee, Governance Committee, Member Operations and Engagement Committee, Regulatory and Legislative Affairs Committee, and Risk Management Committee. For example, the Risk Management Committee (which includes one of Exeter’s appointees) has been tasked with managing the competitive solicitation for services and credit support described above.

- **Unitil:** Unitil will continue to own and operate the distribution grid and be responsible for delivering power to all customers within the Town through that system and, in most cases, for billing Exeter Community Power customers for electricity use. As they are now, customers will be charged for utility delivery services at rates set by the Public Utilities Commission.

**B. Administration**

The administration will be carried out based on the division of responsibilities and tasks as described in the previous section.

**C. Methods for Entering into and Terminating Agreements**

This Electric Aggregation Plan authorizes the Exeter Select Board to negotiate, enter into, modify, enforce, and terminate agreements as necessary for the implementation and operation of Exeter Community Power and to delegate such authorities to the Town Manager and/or the Town’s appointed CPCNH Member Representative as they deem appropriate.

**D. Termination of the Community Power Program**

There is no planned termination date for Exeter Community Power. As envisioned, it will continue for as long as its goals are being achieved and electric customers in Exeter are deriving the intended benefits from the program.

The program may be terminated by affirmative vote of the Town Legislative Body (Town Meeting). Following termination, the Exeter Community Power Program would cease operations after satisfying any obligations contractually entered into prior to termination, and after meeting any advance notification period or other applicable requirements in statute or regulation. Upon cessation of operations, participating customers would
either be transferred to default service provided by Unitil or to a competitive electric power supplier of their choosing.

In the event of a decision to terminate the program, Exeter Community Power will provide at least 90 days advance notice regarding the planned termination of the program to participating customers, the Community Power Coalition of NH, the Public Utilities Commission and Unitil.

Upon termination, the balance of any funds accrued in the program’s financial reserve fund and other accounts, if any, would be available for distribution or application as directed by the Exeter Select Board and in accordance with any applicable law and regulation.

5. Customer Participation

A. Notification and Enrollment

Prior to launch of Exeter Community Power, a written notification will be mailed to every Unitil retail electric customer in the Town. The Notice will contain instructions on how to “opt-out” or request to “opt-in” to the program, depending on whether they currently are on default service provided by Unitil or take service from a Competitive Electric Power Supplier:

• Customers already served by Competitive Electric Power Suppliers will be notified and may request to “opt-in” to the program; and

• Customers currently on default service provided by Unitil will be notified, provided the opportunity to decline participation, and thereafter transferred to Exeter Community Power if they do not “opt-out”.

The notice will contain all required details regarding the Exeter Community Power Program, including a description of the program, the implications for Exeter, and customer rights and responsibilities under the program, including instructions for how to enroll in an optional program or product (see Section 7). The notice to customers on Unitil default service will additionally include the initial fixed rate and all charges for the program’s default service that will apply.

All notices will be mailed to customers at least 30 days in advance of program launch and provide instructions for customers on how to opt-out or request to opt-in to the program (for example, by return postcard, calling a phone number or using a web portal). All such information and notifications will also be made available on the Town’s website section established for the Community Power Program.

Optional products, such as energy supplies that have increased renewable power content in excess of the Renewable Portfolio Standard (RPS) content of the program’s default product and other energy services may be offered on an “opt-in” basis. We expect those optional offerings, in addition to other related services, to develop and expand over time.
B. New Customers

After the launch of Exeter Community Power, and subject to applicable rules established by the Public Utilities Commission, new customers will be periodically notified by Exeter Community Power or its vendors, provided with the default service rates of both Unitil and Exeter Community Power, and transferred onto Exeter Community Power default service, unless they choose to “opt-out” and take service from Unitil or a Competitive Electric Power Supplier.

C. Opting-out of Exeter Community Power

Customers enrolled in the Exeter Community Power default service may opt-out of the service at any time, by submitting a request to transfer back to Unitil default service or to a Competitive Electric Power Supplier of their choosing. Such requests must be submitted with adequate notice in advance of the customer’s next regular meter reading by their distribution utility (Unitil), as if the customer were on utility-provided default service or as otherwise provided for by the Public Utilities Commission. (Customers requesting a transfer on dates other than their next available regular meter reading date may be charged an off-cycle meter reading and billing charge.)

Customers that have opted-in to an optional service product offered by Exeter Community Power may switch back to the Unitil default service or to a Competitive Electric Power Supplier, however, such optional service (for example an opt-up energy supply with higher percentage of renewable energy content) may be subject to different terms and conditions including longer cancellation notice requirements. This would be the case, for example, if an optional energy service had cancellation policies that differed from the default service or that had a specific contract term. Such terms and conditions will be disclosed in advance and as part of the service agreement.

D. Rights and Responsibilities of Program Participants

All participants will have available to them the same customer protection provisions of the law and regulations of New Hampshire, including the right to question billing and service quality practices, as they do under the existing default energy service option with Unitil. Customers will be able to ask questions of and register complaints with the Town, Unitil, and the Public Utilities Commission. As appropriate, customer complaints will be directed to either the Community Power Coalition of New Hampshire, or the broker / service provider / competitive supplier, or to Unitil or the Public Utilities Commission.

Participants will continue to be responsible for paying their bills and for providing access to their utility meter and other equipment necessary to carry out utility operations. Failure to do so may result in a customer being transferred from Exeter Community Power back to Unitil (the regulated distribution utility and provider) for default energy service, payment collections and utility shut offs under procedures subject to oversight by the Public Utilities Commission.

E. Customer Data Privacy

Exeter Community Power shall maintain the confidentiality of individual customer data in compliance with its obligations as a service provider under RSA 363:38 (privacy policies for individual customer data; duties and responsibilities of service providers) and other applicable statutes and Public Utilities Commission rules.
Individual customer data includes information that singly or in combination can identify a specific customer including the individual customer’s name, service address, billing address, telephone number, account number, payment information, and electricity consumption. Such individual customer data will not be subject to public disclosure under RSA 91-A (access to governmental records and meetings). Suppliers and vendors for Exeter Community Power will be contractually required to maintain the confidentiality of individual customer data pursuant to RSA 363:38, V(b).

Aggregated or anonymized data that does not compromise confidentiality of individual customers may be released at the discretion of Exeter Community Power and as required by law or regulation.

F. Electric Assistance Program Eligibility

The statewide Electric Assistance Program (EAP) provides qualifying customers with a discount on their monthly electric bill ranging from 8% to 76% depending on income and other factors. Exeter Community Power will support income eligible and enrolled customers in the Electric Assistance Program in the same manner as they are now so that they continue to receive qualifying discounts.

Electric Assistance Program discounts for all eligible electric utility customers in New Hampshire are funded by all ratepayers as part of the System Benefits Charge, which is charged to all customers and collected by the electric utilities as part of their electric service and distribution charge.

At present, the Public Utilities Commission and utilities only support provision of the discount to individual customers when the customer’s electricity supply charges are billed through the distribution utility. Exeter Community Power plans to rely on Unitil to bill customer accounts enrolled in the Electric Assistance Program. Therefore, the establishment of Exeter Community Power will result in no change in the provision or funding of this program.

G. Universal Access, Reliability and Equitable Treatment for Customers

The Plan provides for universal access for all customers by guaranteeing that all customer classes will be offered service under equitable terms and that all retail electric customers will have reliable access to the program. All customers presently enrolled in Unitil’s default service supply will be eligible for automatic enrollment in the program, and they will be automatically enrolled in the Program unless they choose to opt-out. All customers enrolled in the program's default service will have the right to opt-out at any time with no opt-out charge.

As required by law, the program will ensure the equitable treatment of all classes of customers, subject to any differences arising from their varying opportunities and tariffs. Customers will be treated the same based on their circumstances. For example, any customers that request to opt-in after initially declining the opportunity to participate during the initial enrollment period may be offered rates that reflect how market prices have changed in the intervening period.

H. Education and Outreach

An Education and Outreach Plan will be implemented to fully inform and educate potential customers and participants in advance of enrollment in the Community Power Program. The purpose of the Education and
Outreach Plan is to raise awareness and provide retail electric customers with information concerning their opportunities, options and rights for participation in the Program.

Upon approval of this Plan, and prior to the start of the Community Power Program, a formal Education and Outreach Plan will be developed and implemented consisting of several components:

- **Initial Outreach and Education**: This will be conducted in advance of mailing customer notifications. It is intended to promote general awareness of the upcoming program, minimize any questions generated by the arrival of the customer notification and maximize recipients’ ability to make an informed choice about their participation in the Program. This effort will include information about the goals of the Program, the basic terms and conditions including renewable energy components, and the opt-out process.

- **Customer Mailed Notification**: as described in Section A above, mailed customer notices will be a key component of Exeter Community Power’s initial outreach and education initiative.

- **Opt-Out Period Education & Outreach**: The opt-out period will last a minimum of 30 days from the date of mailing of customer notifications. After notices have been sent, the Program will continue its education and outreach to provide residents and businesses the opportunity to learn more and find answers to key questions relating to their decision to opt-out or enroll in one of the optional products of the program. This will include, at a minimum and per RSA 53-E, a public information meeting within 15 days of sending written customer notifications.

- **Marketing Plan for Launch**: This component identifies the steps the Program may take in marketing, including identification of media and other community resources, examples of education and outreach documents, and an expected timeframe for the outreach effort.

- **Ongoing Outreach & Education**: Outreach and education activities will continue following Program launch. Key elements may include:
  - Program performance, particularly relating to competitive market prices, financial status and adoption of optional program products.
  - On-going campaigns to recruit participation into its optional product(s) that contain more renewable energy than required by law (“Opt-Up campaigns”). Increasing participation in these products will serve the stated Program goals to expand new renewable energy and increase overall renewable energy use.
  - Promotion and support of the NHSaves energy efficiency program, and other energy efficiency, weatherization programs and development of local alternative energy generation.
6. Operation and Funding

A. Operations

Exeter Community Power will contract with qualified vendors and carefully vetted suppliers to provide the services, credit support and electricity required to launch and operate the program.

This plan assumes, but does not require, that Exeter Community Power will participate fully in the Community Power Coalition of New Hampshire (CPCNH) by contracting operational services and power supplies jointly with other participating Community Power programs. Alternatively, the Town may choose to contract with a private third-party entity for services required and will formally evaluate the benefits and costs of each option. CPCNH or the third-party contractors will be expected to fund the upfront cost of implementing Exeter Community Power, the expense of which will be amortized and recovered in the program’s rates and charges to participating customers. The Program may also seek opportunities to apply for grant funding, either independently or through CPCNH.

Services provided by CPCNH or third-party entities required to launch and operate the program may include the following:

- Procurement of energy supplies;
- Energy portfolio risk management services;
- Wholesale load-serving entity services;
- Electronic data interchange services with the utility; and
- Customer data management, billing, contact management and communications (such as posting notifications, managing a call center and website, etc.).

Additional support services such as management and planning, budgeting and rate setting, local project development support, regulatory compliance, and legislative and regulatory engagement services (on matters that could impact the program and participating customers) will be addressed through a combination of CPCNH staff support and/or third-party services.

Exeter Community Power will provide “all-requirements” electricity supply for its customers, inclusive of all of the electrical energy, capacity, reserves, ancillary services, transmission services (unless otherwise provided for by Unitil), transmission and distribution losses, congestion management, and other such services or products necessary to provide firm power supply to participants and meet the requirements of New Hampshire’s Renewable Portfolio Standard.

Electricity supply contracts will be executed or guaranteed by investment-grade entities, and suppliers will be required to use proper standards of management and operations, maintain sufficient insurance and meet appropriate performance requirements.
Additionally, RSA 53-E provides Community Power programs with authorities pertaining to meter ownership, meter reading, billing, and other related services. These authorities provide Exeter Community Power with the practical ability to help customers adopt and use innovative technologies (for example, building energy management, smart thermostats, backup battery storage systems, controllable electric vehicle chargers, etc.) in ways that save money, manage load, enhance grid resiliency and reduce the reliance on fossil fuels in our power supply.

While a broad range of innovative services are possible through community power, the implementation of these features and services will take some time to develop. Time is needed both to build the capacity to add these services but also to allow the Public Utilities Commission to adopt enabling rules and coordination with Unitil to adapt existing meter and billing system processes. Refer to section 7-A below for Exeter Community Power’s near-term goals for its startup phase.

B. Costs, Funding and Rate Setting

All costs of the Exeter Community Power Program will recovered in the rates and charges paid by participating customers, under the terms of either the CPCNH Member Cost Sharing Agreement or the Electric Service Agreement negotiated by a third party community power broker / service provider with a Competitive Electric Power Supplier (CEPS).

As stipulated by RSA 53-E, customers who choose not to participate in Exeter Community Power shall not be responsible for any costs associated with the program, apart from incidental costs incurred by the Town prior to the point at which the program starts producing revenue from participating customers. Incidental costs may include the cost associated with planning the establishment of Community Power, reviewing service contracts or the Coalition Joint Powers Agreement by the town attorney, but not any operational or capitalized costs of the program. Those cost are paid only by the participants.

Exeter Community Power will only launch if it is able to offer default rates that are initially lower than or competitive with the fixed energy service charge rates offered by Unitil for residential and general service customers (rate schedules D and GS-2). Going forward the program will strive to maintain competitive rates for all default service customers, as well as customers who opt-in or opt-up to receive optional retail products, while also working to achieve the program’s goals. As stated earlier, a major focus of the Program, as set forth in this Plan is to make renewable electric source more available, accessible and affordable to Exeter customers.

In consultation with CPCNH, or the third party broker / service provider, and the Energy Aggregation Committee, the Select Board will adopt an Energy Risk Management Policy and Financial Reserve Policy to govern the program’s power procurement and rate-setting decisions. Rates will be set at a level such that revenues from participating customers are projected to meet or exceed the ongoing operating and capital costs of the program.

To ensure the financial stability of Exeter Community Power, a portion of revenues will be deposited in a financial reserve account. In general, the fund will be restricted for uses such as:

- In the near-term, maintain competitive customer rates in the context of price fluctuations in the electricity market and other factors;
In the medium term, as collateral for power purchase agreements (including for the development of new renewable and battery storage projects), and for additional credit enhancements and purposes that lower the program’s cost of service; and

Over the long term, may also be used to directly fund other program financial requirements, or to augment the financing for development of new projects and programs in the later years of the program, subject to the Select Board’s approval.

Changes to the program’s default service rates shall be set and publicly noticed at least 30 days in advance of any rate change. Meetings at which rate changes are considered will be public meetings, noticed in two public places at least 10 days in advance of the meeting.

7. Planned Product Options for Electricity Supply

A. General Approach

As stated earlier, some of the broader benefits of Exeter Community Power (see Section 2) will develop over time. The program’s immediate objectives are: (1) to offer competitive default supply rates with higher renewable energy content, (2) accrue operational reserves sufficient to ensure long-term financial stability, (3) offer voluntary products that retail customers may opt-up to receive, such as higher Renewable Portfolio Standard (RPS) power, and (4) to set Net Energy Metering supply rates that at levels that allow local customer-generators (e.g. homes with solar panels or geothermal systems) to participate in the program.

The first phase in the startup of Exeter Community Power will focus on balancing competitive electric rates, renewable power content and the accrual of program reserves to meet these objectives.

B. Planned Initial Electric Supply Options

The table below provides an illustrative example of a default service product and optional “opt-up” products that could be offered to customers:

<table>
<thead>
<tr>
<th>Attributes</th>
<th>DEFAULT SERVICE (automatic enrollment)</th>
<th>OPTIONAL PRODUCTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal: 5-10% above Renewable Portfolio Standard (RPS)</td>
<td>Green Start (“Opt-Up” Option)</td>
</tr>
<tr>
<td>Price</td>
<td>Meet or beat default utility rate at launch</td>
<td>~50% Renewable</td>
</tr>
<tr>
<td></td>
<td>Higher or competitive w/ default utility rate</td>
<td>Exceeds default utility rate</td>
</tr>
</tbody>
</table>
The products that Exeter Community Power initially offers to customers, and the rates charged for each product, will be refined and finalized in advance of program launch and as power purchase agreements are negotiated by the CPCNH or third party service providers on behalf of the Town.

C. Renewable Portfolio Standard Requirements

New Hampshire’s Renewable Portfolio Standard (RPS) requires all electricity suppliers to obtain renewable energy credits (“RECs”) for four distinct “classes” of renewables, each distinguishing between different technologies and dependent upon the year that the generators came online.

For 2021, Unitil is required to include 21.6% renewable energy in their energy supply. This minimum compliance requirement will increase incrementally to 25.2% by 2025 and remain fixed thereafter, absent an increase in the RPS.

Exeter Community Power will seek to procure voluntary renewables in excess of the RPS minimum requirements from “Class I” resources (as defined in Attachment 3). Additionally, the program could prioritize including as much renewable energy sourced from generating resources located in New Hampshire and New England as possible.

8. Inventory of Customer Electric Demand in Exeter

Electricity customers are classified into three broad categories in the table below (Municipal, Residential, and Commercial & Industrial), which shows the total number and annual electricity usage of all customers within Exeter. As of the drafting of this plan, we do not have information about the number of customers in each category currently use the Unitil default energy service versus those who already purchase electricity from a competitive supplier. Note that only non-municipal customers that are receiving Unitil default service would be automatically enrolled on an “opt-out” basis into the Exeter Community Power service.

System wide, according to recent “Customer Migration” PUC filings by Unitil, approximately 89% of all customers and 61% of annual kWh usage are classified under default supply. More detailed standardized demand data will be obtained from Unitil in advance of initiating procuring electricity. Refer to “Customer Data Privacy” in Section 5 above for details on how data confidentiality will be maintained in compliance with applicable statutes and regulations.
9. Relationship with Community Power Coalition of New Hampshire (CPCNH)

Exeter is a founding member of the Community Power Coalition of New Hampshire ("the Coalition" or "CPCNH"), a Joint Powers Agency authorized under RSA 53-A ("Agreements Between Governments: Joint Exercise of Powers") that will operate on a not-for-profit basis. RSA 53-A enables groups of communities to exercise the same powers that they are authorized to do individually.

Exeter has appointed representatives to the Coalition’s Board of Directors to help oversee and govern the new power agency. All meetings are subject to NH’s Right to Know Law and open to the public.

The Coalition was created to facilitate community power programs in towns, cities, and counties across New Hampshire. Specifically, the Coalition was established to assist in the following ways:

1. Access the resources and support required to streamline the process of establishing an Electric Aggregation Committee, drafting an Electric Aggregation Plan and approving a new Community Power program.
2. Jointly solicit and contract for third-party services and staff support to launch and operate Community Power programs, without requiring any upfront costs or imposing any financial liabilities on participating communities.
3. Participate in joint power solicitations and local project development opportunities.
4. Share knowledge and collaborate regionally on clean energy and resilient infrastructure development at the community-level throughout the state.

CUSTOMER ACCOUNT AND USAGE DATA - EXETER

<table>
<thead>
<tr>
<th></th>
<th>Unil ALL CUSTOMERS</th>
<th>Unitil Default Supply Customers</th>
<th>Competitive Supply Customers</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Customer Accounts</td>
<td>Annual Usage (MWh)</td>
<td>Customer Accounts</td>
</tr>
<tr>
<td>Municipal</td>
<td>820</td>
<td>7,348.1</td>
<td>TBD</td>
</tr>
<tr>
<td>Residential</td>
<td>7305</td>
<td>51,727.9</td>
<td>TBD</td>
</tr>
<tr>
<td>Comm &amp; Ind</td>
<td>1083</td>
<td>89,075.2</td>
<td>TBD</td>
</tr>
<tr>
<td>Total</td>
<td>9208</td>
<td>148,151.2</td>
<td>TBD</td>
</tr>
</tbody>
</table>

Source: Unitil; information for 2020 calendar year.
5. Advocate for Community Power Programs with the Legislature, and Public Utilities Commission and state agencies on public policy issues related to energy and Community Power.

The Coalition is governed by its community members under a joint powers agreement executed by each member with a voluntary and flexible membership structure. It is organized for the purpose of providing cost competitive electricity services on a statewide basis. See Appendix 7 for additional information about the Coalition.

This Aggregation Plan assumes, but does not require, that the Exeter Community Power program will rely upon the Coalition’s member services to launch and operate the program. Based on the design and projected size of the Coalition, the Aggregation Committee anticipates that implementing community power in Exeter though CPCNH will result in cost savings, less need for town staff support and enhanced future access to innovative energy projects and services. However, the Select Board retains the authority to contract for any and all required program services and electricity supplies, and to pursue program implementation and future projects independently of the Coalition.

10. **Net Metering Compensation**

Net metering process in New Hampshire is governed by RSA 362 A. Under the provisions of this statute, customers who install renewable generation or qualifying combined heat and power systems up to 1,000 kilowatts in size are eligible to receive credit or compensation for any electricity generated onsite in excess of their onsite usage.

Any surplus generation produced by these systems flows back into the distribution grid and offsets the electricity that would otherwise have to be purchased from the regional wholesale market to serve other customers.

Currently, customer-generators are charged their full retail rate for electricity supplied by Unitil and receive credits for electricity they export to the grid based on Unitil’s Net Energy Metering (NEM) tariffs.

Exeter Community Power, as governed by applicable PUC rules and guidance, intends to provide rates and terms that compensate participating customer-generators for the electricity supply component of their net metered surplus generation.

Customer-generators will continue to receive any non-supply related components (e.g., transmission and distribution credits) directly from Unitil, as specified under the terms of their applicable net energy metering tariff.

Certain aspects of administering net energy metering will require coordination between Unitil and Exeter Community Power. The enabling services and strategies that Exeter Community Power may pursue, in order to benefit and encourage customers to adopt distributed generation, include but are not limited to:

- Dual-billing customer-generators separately for supply services;
- Offering time-varying rates and alternative credit mechanisms to compensate customers for surplus generation;
• Streamlining the establishment of new Group Net Metering and Low-Moderate Income Solar Project groups;
• Facilitating interval meter and Renewable Energy Certificate (REC) meter installations for customer-generators; and
• Engaging at the Legislature and Public Utilities Commission to advocate for upgrades and reforms to metering and billing infrastructure and business processes to enable Net Energy Metering and other innovative services to benefit customer-generators.

Exeter Community Power’s exact terms, conditions, and rates for compensating and crediting different types of Net Energy Metering customer generators in Exeter are not established at this time and will be set at duly noticed public meetings and fully disclosed to all prospective Net Energy Metering customers through the program’s enrollment and rate setting notification processes as outlined in Sections 5 and 6.

11. Public Input Process

Efforts to inform the public about community power have already begun. The Exeter Community Power Aggregation Committee (ECPAC) has produced a brochure explaining community power programs and how Exeter might benefit from participation. In addition, ECPAC hosted a panel discussion aired on Exeter TV in which members of the Committee, a representative from Unitil, the town manager of Hanover and a founding member of the Community Power Coalition of NH addressed a set of frequently asked questions as well as questions from the viewing audience. Both the brochure and the panel’s Q/A can be accessed on the ECPAC website and are included in the Appendix of this Plan.

Public Hearings required by RSA 53E took place on November 29, 2021 and December 13, 2021. These hearings were held to inform the public about community power in general, to explain the important features of Exeter’s electric aggregation plan (EAP), and to invite questions, comments and input from the public on the draft EAP. Should the Exeter Select Board recommend the adoption of Exeter’s EAP in a warrant article for town vote, members of ECPAC will be present at the deliberative session to hear comments and answer questions from town voters. If the town votes to accept the community power plan, ECPAC will then conduct additional efforts to reach out to the community, specifically to fully inform and educate potential customers and participants in advance of the implementation of the program. Specific steps for outreach that will be taken during program implementation are outlined in Section 5.H. above.

12. Amending the Electric Aggregation Plan

From time to time, it may be necessary to amend the Exeter Community Power Aggregation Plan. As provided for in RSA 53-E:7, such amendments or modifications to the Plan itself or to the electric aggregation program it establishes, once adopted by Town Meeting, may be made by the Select Board. Such amendments to the plan or program may be made following a duly noticed public hearing at which the amendments or modifications are presented.
13. APPENDICIES

1. Community Power Enabling Statute (RSA 53-E)
2. Public Information Materials
3. Community Power Survey
4. Exeter Community Power Question and Answers Script
5. Public Hearing Notice
6. Overview of the Community Power Coalition of New Hampshire
7. Available Utility Data
APPENDIX 1: COMMUNITY POWER ENABLING STATUTES AND AMENDMENTS

RSA 53-E
Aggregation of Electric Customers by Municipalities And Counties

HB 315
(Amendments to RSA 53-E and related statutes adopted June 24, 2021)

AN ACT relative to the aggregation of electric customers and municipal host customer generators serving political subdivisions
TITLE III
TOWNS, CITIES, VILLAGE DISTRICTS, AND UNINCORPORATED PLACES

CHAPTER 53-E
AGGREGATION OF ELECTRIC CUSTOMERS BY MUNICIPALITIES AND COUNTIES

Section 53-E:1

53-E:1 Statement of Purpose. – The general court finds it to be in the public interest to allow municipalities and counties to aggregate retail electric customers, as necessary, to provide such customers access to competitive markets for supplies of electricity and related energy services. The general court finds that aggregation may provide small customers with similar opportunities to those available to larger customers in obtaining lower electric costs, reliable service, and secure energy supplies. The purpose of aggregation shall be to encourage voluntary, cost effective and innovative solutions to local needs with careful consideration of local conditions and opportunities.


Section 53-E:2

53-E:2 Definitions. –

I. "Aggregation" means the grouping of retail electric customers to provide, broker, or contract for electric power supply and energy services for such customers.
II. "Aggregator" means, unless the context indicates otherwise, a municipality or county that engages in aggregation of electric customers within its boundaries.
III. "Commission" means the public utilities commission.
IV. "Committee" means the electric aggregation committee established under RSA 53-E:6.
V. "County" means any county within the state.
VI. "Municipality" means any city, town, unincorporated place, or village district within the state.


Section 53-E:3

53-E:3 Municipal and County Authorities. –

Any municipality or county may:
I. Aggregate the retail electric customers within its boundaries who do not opt out of or who consent to being included in an aggregation program.
II. (a) Enter into agreements and provide for:
(1) The supply of electric power.
(2) Demand side management.
(3) Conservation.
(4) Meter reading.
(5) Customer service.
(6) Other related services.
(7) The operation of energy efficiency and clean energy districts adopted by a municipality pursuant to RSA 53-F and as approved by the municipality's governing body.
(b) Such agreements may be entered into and such services may be provided by a single municipality or county, or by a group of such entities operating jointly pursuant to RSA 53-A.


Section 53-E:3-a

53-E:3-a Municipal Aggregators Authorized. – Municipal aggregators of electricity load under this chapter, and municipalities operating municipal electric utilities under RSA 38, are expressly authorized to aggregate other services commonly and regularly billed to customers. Municipalities may operate approved aggregation programs as self-supporting enterprise funds including the use of revenue bonds pursuant to RSA 33-B and RSA 374-D and loans from other municipal enterprise funds as may be approved by the governing body and the legislative body of the municipality. Any such loans from other municipal enterprise funds shall be used for purposes that have a clear nexus to the primary purposes of such other funds, such as generation, storage, or sale of power generated from sites, facilities, or resources that might otherwise be operated or produced by the other enterprise fund. Nothing in this chapter shall be deemed to limit the capacity of customers to select any service or combination of services offered by such municipal aggregators or to limit the municipality from combining billing for any or all utility services.


Section 53-E:3-b

53-E:3-b Use of "Community Power" as a Name Reserved. – The use of the term "Community Power" following the name of a municipality or county shall be reserved for the exclusive use by such entity as a name for proposed or approved municipal or county aggregations. Aggregations operated jointly by a group of such entities pursuant to RSA 53-A may adopt an appropriate identifying name in conjunction with the term "Community Power" as a name.


Section 53-E:4

53-E:4 Regulation. –
I. An aggregator operating under this chapter shall not be considered a utility engaging in the wholesale purchase and resale of electric power and shall not be considered a municipal utility under RSA 38. Providing electric power or energy services to aggregated customers within a municipality or county shall not be considered a wholesale utility transaction. However, a municipal or county aggregation may elect to
participate in the ISO New England wholesale energy market as a load serving entity for the purpose of procuring or selling electrical energy or capacity on behalf of its participating retail electric customers, including itself.

II. The provision of aggregated electric power and energy services under this chapter shall be regulated by this chapter and any other applicable laws governing aggregated electric power and energy services in competitive electric markets.

III. Transmission and distribution services shall remain with the transmission and distribution utilities, who shall be paid for such services according to rate schedules approved by the applicable regulatory authority, which may include optional time varying rates for transmission and distribution services that may be offered by distribution utilities on a pilot or regular basis. An aggregator shall not be required to own any utility property or equipment to provide electric power and energy services to its customers.

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.

V. Municipal or county aggregations that supply power shall be treated as competitive electricity suppliers for the purpose of access to the electric distribution utility's electronic data interface and for ceasing operations.

VI. Municipal or county aggregations shall be subject to RSA 363:38 as service providers and individual customer data shall be treated as confidential private information and shall not be subject to public disclosure under RSA 91-A. An approved aggregation may use individual customer data to comply with the provisions of RSA 53-E:7, II and for research and development of potential new energy services to offer to customer participants.


Section 53-E:5

53-E:5 Financial Responsibility. – Retail electric customers who choose not to participate in an aggregation program adopted under RSA 53-E:7 shall not be responsible for, and no entity shall require them to pay, any costs associated with such program, through taxes or otherwise except for electric power supply or energy services consumed directly by the municipality or county, or incidental costs, which may include costs necessary to comply with the provisions of this chapter up to the time that the aggregation starts to produce revenue from participating customers.


Section 53-E:6

53-E:6 Electric Aggregation Plan. –
I. The governing body of a municipality or county may form an electric aggregation committee to develop a plan for an aggregation program for its citizens. A municipality or county may join other municipalities or counties in developing such plans.

II. The plan shall provide universal access, reliability, and equitable treatment of all classes of customers subject to any differences arising from varying opportunities, tariffs, and arrangements between different electric distribution utilities in their respective franchise territories, and shall meet, at a minimum, the basic...
environmental and service standards established by the commission and other applicable agencies and laws concerning aggregated service.

III. The plan shall detail:
   (a) The organizational structure of the program.
   (b) Operation and funding.
   (c) Rate setting and other costs to participants, including whether energy supply services are offered on an opt-in basis or on an opt-out basis as an alternative default service.
   (d) The methods for entering and terminating agreements with other entities.
   (e) The rights and responsibilities of program participants.
   (f) How net metered electricity exported to the distribution grid by program participants, including for group net metering, will be compensated and accounted for.
   (g) How the program will ensure participants who are enrolled in the Electric Assistance Program administered by the commission will receive their discount.
   (h) Termination of the program.

IV. The committee shall approve a final plan which the committee determines is in the best, long-term interest of the municipality or county and the ratepayers.

V. The committee shall solicit public input in the planning process and shall hold public hearings.


### Section 53-E:7

**53-E:7 Aggregation Program.**

I. The governing body of a municipality or county may submit to its legislative body for adoption a final plan for an aggregation program or any revision to include an opt-out default service program, to be approved by a majority of those present and voting.

II. If the plan is adopted or once adopted is revised to include an opt-out alternative default service, the municipality or county shall mail written notification to each retail electric customer within the municipality or county. To enable such mailed notification and notwithstanding RSA 363:38, after an aggregation plan is duly approved the electric distribution utility or utilities serving an adopting municipality or county shall provide to such municipality or county a current list of the names and mailing addresses of all their electric customers taking distribution service within the municipality or county. Notification shall include a description of the aggregation program, the implications to the municipality or county, and the rights and responsibilities that the participants will have under the program, and if provided on an opt-out basis, the fixed rate or charges that will apply. No retail electric customer shall be included in a program in which the customer does not know all of the rates or charges the customer may be subject to at least 30 days in advance of the customer's application and has the option, for a period of not less than 30 days from the date of the mailing, to opt out of being enrolled in such program, unless the customer affirmatively responds to the notification or requests in writing to be included in the program.

III. Within 15 days after notification of the plan has been sent to retail electric customers in the service area, a public information meeting to answer questions on the program shall be held.

IV. Services proposed to be offered by or through the aggregation shall be on an opt-in basis unless the approved aggregation plan explicitly creates an opt-out alternative default energy service program where the rate or price is known at least 30 days in advance of its application and, for a period of not less than 30 days from the date notification is mailed, the customer has the opportunity to opt out of being enrolled in such program, by return postcard, website, or such additional means as may be provided. Customers who are on default service provided by an electric distribution utility shall be automatically enrolled in an aggregation
provided alternative default service if they do not elect to opt out. Customers opting out will instead remain on default service. Customers taking energy service from a competitive electricity supplier shall not be automatically enrolled in any aggregation program, but may voluntarily opt in. New customers to the electric distribution utility after the notification mailing required by paragraph II shall be given a choice of enrolling in utility provided default service or aggregation provided default service, where such exists. New customers shall be informed of pricing for each when they apply for service. Such new customers may also enroll with a competitive electricity supplier. 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. Municipal aggregations shall take priority or precedence over any county aggregations. Customers automatically enrolled in a municipal or county provided default service shall be free to elect to return to utility provided default service or to transfer to a competitive electricity supplier with adequate notice in advance of the next regular meter reading by the distribution utility, in the same manner as if they were on utility provided default service or as approved by the commission.

V. Once adopted, an aggregation plan and program may be amended and modified from time to time as provided by the governing body of the municipality or county. In all cases the establishment of an opt-out default service program shall be approved as provided in paragraph I.

VI. The commission may adopt rules, under RSA 541-A, to implement this chapter, including but not limited to rules governing the relationship between municipal or county aggregators and distribution utilities, metering, notice of the commencement or termination of aggregation services and products, and the reestablishment of a municipal or county aggregation that has substantially ceased to provide services. Where the commission has adopted rules in conformity with this chapter, complaints to and proceedings before the commission shall not be subject to RSA 541-A:29 or RSA 541-A:29-a.


Section 53-E:8

53-E:8 Other Aggregators. – Nothing in this chapter shall preclude private aggregators from operating in service areas served by municipal or county aggregators.

CHAPTER 229
HB 315 - FINAL VERSION

2021 SESSION
21-0533
10/08

HOUSE BILL 315

AN ACT relative to the aggregation of electric customers and municipal host customer generators serving political subdivisions.


COMMITTEE: Science, Technology and Energy

AMENDED ANALYSIS

This bill revises the procedures applicable to municipal or county aggregators and municipal electric utilities for the aggregation of energy services. This bill also establishes an exemption under net energy metering for net metered facilities that generate electricity to offset electrical requirements of a group consisting of political subdivisions.

---------------------------------------------------------------
Explanation: Matter added to current law appears in bold italics.
Matter removed from current law appears [in brackets and struckthrough.]
Matter which is either (a) all new or (b) repealed and reenacted appears in regular type.

STATE OF NEW HAMPSHIRE

In the Year of Our Lord Two Thousand Twenty One

AN ACT relative to the aggregation of electric customers and municipal host customer generators serving political subdivisions.

Be it Enacted by the Senate and House of Representatives in General Court convened:

229:1 Aggregation of Electric Customers; Definition; Aggregation. Amend RSA 53-E:2, I to read as follows:
I. "Aggregation" means the grouping of retail electric customers to provide, broker, or contract for [electric power supply and] energy services for such customers.

229:2 New Paragraph; Definition; Energy Services. Amend RSA 53-E:2 by inserting after paragraph V the following new paragraph:
V-a. "Energy services" means the provision of electric power supply solely or in combination with any or all of the services specified in RSA 53-E:3.

229:3 Municipal and County Authority; Agreements. Amend RSA 53-E:3, III(a) to read as follows:
II.(a) Enter into agreements and provide for energy services, specifically:
(1) The supply of electric power and capacity.
(2) Demand side management.
(3) Conservation.
(4) Meter reading, with commission approval for meters owned or controlled by the electric distribution utilities or used for load settlement.

http://www.gencourt.state.nh.us/bill_Status/billinfo.aspx?id=527&inflect=2
(5) Customer services for aggregation provided services.
(6) Other related services.
(7) The operation of energy efficiency and clean energy districts adopted by a municipality pursuant to RSA 53-F and as approved by the municipality's governing body.

229:4 Municipal Aggregators. Amend RSA 53-E:3-a to read as follows:

53-E:3-a Municipal Aggregators Authorized. Municipal aggregators of electricity load under this chapter, and municipalities operating municipal electric utilities under RSA 38, are expressly authorized to aggregate energy services [commonly and regularly billed to customers as described in RSA 53-E:3.] Municipalities may operate approved aggregation programs as self-supporting enterprise funds including the use of revenue pursuant to RSA 33-B and RSA 374-D and loans from other municipal enterprise funds as may be approved by the governing body and the legislative body of the municipality. Any such loans from other municipal enterprise funds shall be used for purposes that have a clear nexus to the primary purposes of such other funds, such as generation, storage, or sale of power generated from sites, facilities, or resources that might otherwise be operated by the other enterprise fund. Nothing in this chapter shall be deemed to limit the capacity of customers to select any service or combination of services offered by such municipal aggregators or to limit municipality from combining billing for [any or all utilities] energy services with other municipal services.

229:5 Regulation of Aggregators. Amend RSA 53-E:4, IV to read as follows:

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 providing 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[s]. Such metering shall be implemented subject to the commission finding it is in the public good, assuring that meters used for distribution tariff implementation remain under the control and majority ownership of the electric distribution and [approval is] otherwise approving the terms and conditions for such arrangements, including sharing or transfer of meter data from and to the electric distribution utility.

229:7 Financial Responsibility. Amend RSA 53-E:5 to read as follows:

53-E:5 Financial Responsibility. Retail electric customers who choose not to participate in an aggregation program adopted under RSA 53-E:7 shall not be responsible for, and no entity shall require them to pay, an associated with such program, through taxes or otherwise except for electric power supply or energy services consumed directly by the municipality or county, or incidental costs, which may include costs necessary to with the provisions of this chapter up to the time that the aggregation starts to produce revenue from participating customers, but shall not include any capitalized or operating costs of an aggregation program.

229:8 Electric Aggregation Plan. Amend RSA 53-E:6, I to read as follows:

I. The governing body of a municipality or county may form an electric aggregation committee to develop a plan for an aggregation program for its citizens. A municipality or county may join other municipalities or cities in developing such plans. A county plan may provide an aggregation program for all or a subset of municipalities within the county that request to participate by a majority vote of their respective governing bodies.

229:9 Aggregation Program. RSA 53-E:7 is repealed and reenacted to read as follows:

53-E:7 Aggregation Program.

I. The governing body of a municipality or county may submit to its legislative body for adoption a final plan for an aggregation program or any proposal to include an opt-out aggregation program, to be approved by majority of those present and voting.

II. Every electric aggregation plan and any revision of a plan to include an opt-out default service program shall be submitted to the commission, either before or after being submitted by the governing body to the legislative body for approval, to determine whether the plan conforms to the requirements of this chapter and applicable rules of the commission. The commission shall approve any plan submitted to it unless it finds that it does not meet the requirements of this chapter and other applicable rules and shall detail in writing addressed to the governing bodies of the municipalities or counties concerned, the specific respects in which the proposed plan substantially fails to meet the requirements of this chapter and applicable rules. Failure to disapprove a plan submitted hereunder within 60 days of its submission shall constitute approval thereof. A municipality or county may submit a plan that is revised to comply with applicable requirements at any time and start the review process over. Any plan submitted to the commission under this paragraph shall also be submitted on the same date to the offices of the consumer advocate under RSA 362:28 and any electric distribution utility providing service within the jurisdiction of the municipality or county. The consumer advocate, utilities, and members of the public may file comments about such plans within the first 21 days of their submission. Commission review and approval of electric aggregation plans shall not require a contested case but shall allow time for submission and consideration of all comments.

III. If the plan is adopted or once adopted is revised to include an opt-out service, the municipality or county shall mail written notification to each retail electric customer within the municipality or county service area in advance of any mailed notice. If the plan is not so revised, and notwithstanding RSA 363:38, after an aggregation plan is duly approved the electric distribution utility or utilities serving an adopting municipality or county shall provide customers with a copy of the plan. The electric distribution utility or utilities shall provide notice of the aggregation plan at least 30 days before the date that the aggregation plan becomes effective. Such notice shall include the implications to the municipality or county of the aggregation plan, including rate impacts and any other information necessary for successful enrollment in the aggregation. The notice shall be mailed on or before the date that the aggregation plan is effective. The notice shall be mailed to each retail electric customer within the municipality or county and shall be distributed to customers within the municipality or county.

IV. Within 15 days after notification of the plan has been sent to retail electric customers in the service area, a public information meeting to answer questions on the program shall be held.

V. Services proposed to be offered by or through the aggregation shall be on an opt-in basis unless the adopted aggregation plan explicitly creates an opt-out alternative default energy service program where the rate or rates are lower than the rates in effect at the time of the notification and mailings. The plan shall include a description of the aggregation program, the implications to the municipality or county of the aggregation plan, and the rights and responsibilities of the participants who will have under the program, and if provided on an opt-out basis, the fixed rate or charges that will apply. No retail electric customer shall be included in an aggregation program in which the customer does not know all of the rates or charges the customer is required to pay and the option, for a period of not less than 30 days from the date of the mailing of the notice to the customer, to discontinue participating in the program. Customers taking service from a competitive electricity supplier shall not be enrolled in the aggregation program, unless they voluntarily opt in.

VI. New customers to the electric distribution utility after the notification mailing required by paragraph III shall initially be enrolled in utility provided default service unless the customer has relocated within a single utility service area and is continuing service with a competitive supplier or a municipal or county aggregation program. Upon request of an aggregator, but not more frequently than monthly and notwithstanding RSA 363:38, a municipal or county aggregation may elect to participate in the ISO New England wholesale energy market as a load serving entity for the purpose of procuring or selling electrical energy or capacity on behalf of its participating retail electric customers, including it in a plan approved by the commission.

http://www.gencourt.state.nh.us/bill_Status/billinfo.aspx?id=527&inflect=2
VII. Municipal aggregations shall take priority or precedence over any county aggregations and each such aggregation shall be responsible for assuring that customers are enrolled with the correct aggregation.

VIII. Customers enrolled in a municipal- or county-provided default service shall be free to elect to transfer to utility provided default service or to transfer to a competitive electricity supplier with adequate notice in a of the next regular meter reading by the distribution utility, in the same manner as if they were on utility provided default service or as approved by the commission. No such customer shall be required to pay any exi charge for such transfer. Customers requesting transfer of supply service upon dates other than on the next available regular meter reading date may be charged an off-cycle meter reading and billing charge. Upon req the customer the aggregator shall transfer the customer back to utility provided default service.

IX. Once adopted, an aggregation plan and program may be amended and modified from time to time as provided by the governing body of the municipality or county. In all cases the establishment of an opt-out service program shall be approved as provided in paragraphs I, II, and IV.

X. The commission shall adopt rules, under RSA 541-A, to implement this chapter and, to the extent authorities granted to municipalities and counties by this chapter materially affect the interests of electric distr utilities and their customers, to reasonably balance such interests with those of municipalities and counties for the public good, which may also be done through adjudicative proceedings to the extent specified or not ad in rules. Such rules shall include but not be limited to rules governing the relationship between municipal and county aggregators and distribution utilities, metering, billing, access to customer data for planning and op of aggregations, notice of the commencement or termination of aggregation services and products, and the reestablishment of a municipal or county aggregation that has substantially ceased to provide services. Wh commission has adopted rules in conformity with this chapter, complaints to and proceedings before the commission shall not be subject to RSA 541-A:29 or RSA 541-A:29-a.

229:10 New Section; Billing Arrangements. Amend RSA 53-E by inserting after section 8 the following new section:

53-E:9 Billing Arrangements.

I. For purposes of this section the term “supplier” shall mean an aggregator functioning as a load serving entity under this chapter or a competitive electricity supplier serving an aggregation under this chapter. The ter also include competitive electricity suppliers generally to the extent and for such customer rate classes as the commission finds, after notice and hearing, that it is for the public good. Such a determination shall be on a specific basis, as proposed and assented to by the utility.

II. Each electric distribution utility shall propose to the commission for review and approval a program for the purchase of receivables of the supplier in which the utility shall pay in a timely manner the amounts due suppliers from customers for electricity supply and related services less a discount percentage rate equal to the utility’s actual uncollectible rate, adjusted to recover capitalized and operating costs specific to the implement and operation of the purchase of receivables program, including working capital. Additionally, such discount rate adjustments shall include a pro rata share of the cost of administering collection efforts such that the participation in the purchase of receivables program shall not require the utility or non-participating consumers to assume any costs arising from its use. Such pro rata costs must include, but not be limited to, any increase in the utility’s bad debt write-offs attributable to participants in the purchase of receivables program, as approved by the commission. However, the allocation of costs arising from different rate components and determinations of uncollectible rate shall be equitably allocated between such suppliers, utility provided default service, and other utility charges that are a part of consolidated billing by the utility as approved by the commission. The commission shall make such determinations and pro rata rates shall be subject to periodic adjustment as approved by the commission.

229:11 Eligible Customer Generator; Exception Added for Municipal Hosts. Amend RSA 362-A:1-a, II-b through II-e to read as follows:

II-b. "Eligible customer-generator" or "customer-generator" means an electric utility customer who owns, operates, or purchases power from an electrical generating facility either powered by renewable energy or employs a heat led combined heat and power system, with a total peak generating capacity of up to including one megawatt, except as provided for a municipal host as defined in paragraph II-c, that is located b retail meter on the customer's premises, is interconnected and operates in parallel with the electric grid, and is used to offset the customer's own electricity requirements. Incremental generation added to an existing gen facility, that does not itself qualify for net metering, shall qualify if such incremental generation meets the qualifications of this paragraph and is metered separately from the nonqualifying facility.

II-c. "Municipal host" means a customer generator with a total peak generating capacity of greater than one megawatt and less than 5 megawatts used to offset the electricity requirements of a group of one or more customers who are political subdivisions, provided that all customers are located within the same utility franchise service territory. A municipal host shall be located in the same municip all group members if the facility began operation after January 1, 2021. A municipal host may be owned by either a public or private entity. For this definition, "political subdivision" means any city, town, school district, charter public school, village district, school administrative unit, or any district or entity created for a special purpose administered or funded by any of the above-named governmental units.

II-d. "Eligible fuel" means natural gas, propane, wood pellets, hydrogen, or heating oil when combusted with a burner, including air emission standards for the device using the approved fuel.

II-e. "Heat led" means that the combined heat and power system is operated in a manner to satisfy the heat usage needs of the customer-generator.
APPENDIX 2: PUBLIC INFORMATION MATERIALS
WHAT SHOULD EXETER RESIDENTS & BUSINESSES DO?

A Community Power Plan must be approved by the Select Board and brought to a Town vote.

GET INFORMED: The Exeter Community Power Aggregation Committee (ECPAC)*, authorized by the Exeter Select Board in May 2021, is preparing an Electric Aggregation Plan (EAP) which will be submitted to the Select Board. View a recent panel discussion filmed by Exeter TV. Find the link on our webpage.

GIVE INPUT: Public Hearings will be held on November 29 and December 13. Please come with your thoughts and questions.

VOTE: If the Select Board approves the Electric Aggregation Plan, a warrant article will be presented for vote at Town Meeting in March 2022, to establish the Community Power Plan.

PARTICIPATE: If adopted, most residents and businesses currently served by Unitil will automatically be enrolled in the community power plan, but may opt out at any time.

*The ECPAC is associated with the Town of Exeter Energy Committee

SCHEDULE

2021-2022

11/29/21 Public Hearing #1 at Nowak Room
12/6/21 Deliver proposal to Exeter Select Board
12/13/21 Public Hearing #2 at Nowak Room

If Select Board approves then:
1/18/21 Select Board writes a warrant article
2/5/22 Town Deliberative Session
3/8/22 Town Vote

For more information:
Community Power Coalition of NH
www.cpcnh.org
Exeter’s Community Power Web Page
www.exeternh.gov/bcc-cpac

What you need to know about our electricity

Exeter Community Power Aggregation
What is Community Power Aggregation?

In many states across the country, municipalities and counties have launched regional Community Power Aggregation programs as a means of taking control of their combined electricity purchases, both to reduce the cost to consumers and to push for production of more renewable energy.

In New Hampshire, Community Power Aggregation (CPA), authorized by NH RSA 53-E, works by having a large group of customers come together to buy their electricity directly from the producer instead of having the utility, such as Unitil, purchase it. The benefit of initiating a CPA in Exeter is to be able to offer residents and customers a higher mix of renewable energy supplies at comparatively lower costs than currently available.

Currently, Exeter’s primary utility provider, Unitil, purchases electric power for most Exeter residents and businesses every six months. This is called the “default supply”. If approved by Exeter, Community Power would allow the town to purchase electric power on behalf of residents, businesses, and municipal accounts from alternative energy suppliers. Customers can choose to opt out of Community Power agreement at any time. Unitil would continue to deliver the electricity, maintain the equipment and lines and handle billing.

The current “default supply” includes about 20% in renewable sources. The intention of the Community Power plan is to add other options, some with greater percentages of renewables at competitive prices.

Benefits

LOCAL CONTROL: Making decisions for the town and getting the benefit of economies of scale to lower costs and increase renewables in the electric supply.

CUSTOMER CHOICE: Customers can choose what types of energy supply they want to be using and can also choose whether to participate in the program.

CLEAN ENERGY: Through choice at both the municipal and individual customer levels, Exeter can both benefit from and invest in the development of clean energy resources.

INNOVATION: Community Power programs can create a number of benefits for residents and businesses including: affordable rates, green power options, demand response and time varying rates, greater access to rooftop solar, home energy storage or other technology innovations.

Frequently Asked Questions

Q: What is the cost Exeter residents and businesses?
A: There is no additional cost to Exeter taxpayers to participate in a Community Power program. Resident and business electricity costs will depend on what the CPA has negotiated and on what mix of energy sources they choose.

Q: Why is Exeter investigating Community Power now?
A: A Community Power has been allowed in NH since electric deregulation in 1993. It has never been used because of flaws and limitations in the governing law (RSA 53-E). That law was changed in 2019 and since then a coalition of about 15 NH communities, including Exeter, has formed to facilitate Community Power programs. Based on recommendations from the Energy Committee, the Exeter Select Board formed an Electric Aggregation Committee in May 2021 to develop a plan for establishing Exeter Community Power.

Q: If Exeter’s electric aggregation plan is approved by the Select Board and adopted by vote at Town Meeting, will I be required to participate in the Community Power program?
A: No. However, you will be automatically included unless you opt out, which you can easily do at any time. If you already receive power from an alternative provider, you will not be included in Exeter’s program unless you choose to opt in.

Q: How will low-income customers be accommodated?
A: We don’t anticipate there will be any change in assistance available to low income households as a result of shifting to a community power energy supply model.
Press Release

Exeter investigates advisability of Community Power for residents and town

The Exeter Community Power Aggregation Committee (ECPAC) is developing a plan to allow residents and the town to purchase electricity directly from suppliers. Community Power programs allow for options to use renewable energy sources and enable participating towns to procure electricity for residents and businesses at lower cost. The plan will be submitted to the Select Board and, if approved, will be on the ballot for a town vote at the meeting in March 2022.

To be fair, the savings are not likely to be dramatic for residential users – typically about $50 to $75 annually. A more significant advantage, though, is that community power plans allow individual consumers to choose the amount of renewable energy in their electricity supply. For instance, a consumer could choose a low-cost plan with a renewable mix like that provided by their utility or choose an alternative plan with a larger proportion of renewables. Community Power plans do not lock consumers into their service; consumers can opt out of a plan at any time to return to the service provided by their utility ensuring no change to their electric supply. If Exeter adopts a Community Power program, Unitil would continue as the energy distributor, maintaining lines and poles, handling billing and customer service just as before.

The town too can benefit from a community power plan. Some of the savings from direct energy purchase can be used to fund projects in the town such as modernized metering, energy storage to provide resilience to power disruptions and price spikes, and the inclusion of local energy sources into the town’s electricity supply.

Community Power programs, which enable NH communities to adopt community power, had bipartisan support in the state legislature and from Governor Sununu. Keene, Hanover, Nashua, and Harrisville are some of the NH municipalities in the process of implementing community power programs. Community Power Programs have operated successfully in several states for many years.

The ECPAC will begin holding information sessions for residents and businesses beginning in November. The first information session will be live on Exeter TV Channel 98 as well as Exeter TV’s Facebook page on November 17th at 7:00 pm. Those looking to join in on the discussion can register for a Zoom webinar to submit questions using the Q&A feature. The information session will consist of a pre-recorded panel discussion about Community Power followed by live Q&A with the panelists.

To Register for the Webinar, click here.

Or go to: https://exeternh.zoom.us/webinar/register/WN_dDy0K12bQ2-5XkoaQm4Bsw
"Community Choice Electric Power"

Explore Exeter's options for Community Power

Panel Discussion on Zoom
Wed., Nov. 17th at 7pm
Zoom info-session followed by Q&A

Moderated by Town Planner, Dave Sharples. Panel members include:

Julia Griffin, Hanover Town Manager;
Henry Herndon, Clean Power Coalition of NH Director;
Alec O’Meara, Unitil Media Relations Manager;
Nick Devonshire & Cliff Sinnott of Exeter Community Power Aggregation Committee

Watch live on Exeter TV:
cable channel 98, “Exeter TV” Facebook page or YouTube

To participate in the Q&A session, please request the Zoom link at:

What is Community Power?
Community Power, authorized by NH RSA 53-E, is a program that allows local governments to procure electric power on behalf of their residents, businesses, and municipal accounts from alternative suppliers. If adopted by a town, citizens and businesses may opt-out at any time and return to their original plan.

The Exeter Select Board authorized the Exeter Community Power Aggregation Committee (ECPAC), a sub-committee of the town energy committee, to gather information and present an energy aggregation plan (EAP) to the Select Board. If approved, the plan will appear as a warrant article for the town vote in March.
APPENDIX 3: COMMUNITY POWER SURVEY
DRAFT

Community Power Survey

In 2019 NH enacted legislation empowering municipalities to purchase electrical energy directly from suppliers giving municipalities the ability to provide residents and businesses electricity at competitive rates while allowing individual consumers choice concerning the amount of renewable energy in their energy supply. Local electric distribution utilities would continue to own and operate the "poles and wires" delivering electricity to all customers in the municipality and customers enrolled in a community power program may opt out at any time to return to utility of third-party supply. Community power programs enable consumers to select a cleaner mix of energy at a rate similar to or less than that from the utility.

In June of this year the Exeter Select Board approved the formation of the Exeter Community Power Aggregation Committee and charged it with the task of investigating community power and drafting a community power plan for Exeter. The Committee has prepared this survey to collect information in order to prepare a Community Power Plan that meets the interests and needs of the Exeter community.

Your Electricity Supply:

1. Who is your electricity supplier? You may have signed a contract with a so called “third party” supplier. If so, the name of that supplier will appear in the “Electric Supplier Service” portion of your Until electric bill. If no supplier name appears, Until is your default supplier.
   - [ ] Unil
   - [ ] Don’t know
   - [ ] Third party supplier /other

2. If your answer to question 1 was Unil, why did you stay with Unil. Check all that apply.
   - [ ] I did not know I had a choice
   - [ ] I see no need to look for a different supplier
   - [ ] I tried but could not find good rates
   - [ ] I heard it is too risky to switch
   - [ ] Other ____________________

3. If your answer to question 1 was “third party supplier/other”, Why did you choose a supplier other than Unil? Check all that apply.
   - [ ] More renewable content
Better rate
Other ____________________

4. What would you want a Community Power Program to bring to Exeter? Check all that apply.

- Choice of electricity options
- Competitive rates
- Increased local renewable energy
- Lower energy bills
- Local jobs
- Increased knowledge about energy and how to reduce costs
- Other ____________________

5. Several NH communities have set goals for municipal energy usage. Should Exeter do the same?

- Yes, 100% renewable by 2030
- Yes. 100% renewable by 2040
- Yes, 100% renewable by 2050
- No, a renewable energy goal is unnecessary.

6. Are you interested in adding more renewable energy to your electricity supply?

- I would like more renewable energy if I can still pay about the same as I pay today.
- I would like more renewable energy and I am willing to pay a little more than I pay today.
- I would like all (100%) renewable energy and am willing to pay more
- No, I would not like more renewable energy

7. Do you generate your own electricity with solar panels or another method?

- Yes, with solar panels
- No
- Other ____________________

Tell us about yourself

8. I am responding for a

- Home in Exeter
- Business in Exeter
- Other ____________________

9. Do you

- Own?
- Rent?
10. Does your household/business pay the electric utility bill?
   - Yes
   - No

11. Which best matches your age?
   - Under 18
   - 18-40
   - 41-65
   - 65+

12. Which best matches your household income level?
   - Under $50,000
   - $51,000 – 99,000
   - $100,000 +
APPENDIX 4: EXETER COMMUNITY POWER QUESTION AND ANSWERS SCRIPT
Community Power

Frequently Asked Questions

1. **What is a community power aggregation (CPA) and how might Exeter’s consumers, residential and commercial benefit from participation in Exeter’s CPA?**

Community power allows a community to have more control over what sources of energy are delivered to its customers through the utility and brings the opportunity to both lower cost and expand the renewable energy component of the energy supply available to Exeter customers.

In brief, Community Power Aggregation works by having a large group of customers come together to buy their energy supply directly from the producer of the energy instead of having our local utility, Unitil, buy it. Unitil would continue to distribute the energy to Exeter residents, businesses and the town. Under the CPA model, Exeter or an organization acting on the Town’s behalf would do the purchasing and would have the opportunity to negotiate the energy source mix, the length of the contract and the price of the energy supplied to Unitil for use by Exeter’s customers.

A large part of the reason for initiating a CPA in Exeter is to be able to offer residents and customers a higher mix of renewable energy supplies at comparatively lower costs than currently available. In addition to that, other benefits are expected in the future. A small fraction of the rate charged for energy supply will be set aside in an energy reserve fund which will accumulate over time and be available to fund energy initiatives offered to Exeter customers. These could include subsidized smart meters, residential solar incentives, energy storage and efficiency projects and even development of renewable energy projects. In many parts of the country the CPA model includes the development of local or regional renewable energy, energy storage and grid modernization projects funded through proceeds generated by the CPA.

2. **Why is the Town pursuing CPA in the first place, and why now?**

The Exeter Energy Committee recommended to the Select Board last spring that the Town begin formally exploring the creation of CPA to take advantage of the potential benefits described in answer to the first question – namely – reducing the cost of the default energy supply, making more renewable energy options available to Exeter customers and, longer term, developing innovative energy projects without burdening Exeter taxpayers. The reason this is coming up now is that a change was made in 2019 to the state enabling law for CPAs (RSA 53-E) which make their formation more feasible to start and more viable to operate. The major change was to allow a CPA, once established, to enroll all retail customers in its community into the program automatically unless they opted out or were already enrolled with an alternative (non-default) energy supplier. That change means that CPAs begin with a substantial (“aggregated”) customer energy demand with which to negotiate for energy supply. As a result of this change, there has been a large uptick in CPA interest by municipalities. To date, about a
dozen communities and counties in New Hampshire, including Exeter, are actively studying and/or creating CPAs. On October 1st, a new coalition of New Hampshire municipal governments was created to help facilitate CPA formation and provide energy market expertise and broker services that will needed for their successful operation. (See question 5)

3. **How does a CPA work?**

To understand how a CPA works we need to talk a little about energy deregulation. Community Power Aggregation taps into a key feature of energy utility deregulation which occurred way back in the 1990s: the separation of energy supply from energy distribution. Since energy deregulation went into effect, utilities such as Unitil have been required to divest themselves of energy production facilities (e.g. power plants) and limit their business to energy distribution (e.g. the power distribution grid, powerlines, poles, transformers, substations, etc. and related administrative functions such as metering and billing). Meanwhile energy producers develop power generating capacity, produce electricity and sell it both to utilities and to end users. Deregulation envisioned that a high level of competition would develop in the energy supply side of the business, as electricity customers would be free to choose between suppliers. The suppliers would need to compete on price and perhaps other features. That was the theory. In reality, this competitive market has been very slow to develop, especially for retail consumers. It exists with large energy consumers such as industries and municipalities (for example, Exeter purchases its energy for its own municipal use through a competitive bid process and pays less per kWh than the default utility rate) but most end users, including most residential customers simply get their electricity supply from the utility’s ‘default supplier.’ A principle reason why competition never developed at the end user level is disaggregation. There are too many residential end users, each using too little energy to great enough demand to successfully negotiate on price.

CPAs are designed to create that large scale aggregation of retail customers that can affectively negotiate on price in the energy market.

4. **What must Exeter do to form a CPA and where is it in that the process?**

The state law which governs the formation of CPAs, RSA 53-E, “AGGREGATION OF ELECTRIC CUSTOMERS BY MUNICIPALITIES AND COUNTIES” lays out quite specifically, what a community must do to set up community power aggregation program. The basic steps, and our expected timeline on them are these:

1. Select Board establishes an Electric Aggregation Committee: Exeter did this in May, 2021, established as the Exeter Community Power Aggregation Committee (ECPAC)
2. The ECPAC prepares a Draft Community Power Aggregation Plan: In progress. The ECPAC started this in July and the draft is expected to be completed in November.
3. The Select Board will review and consider the Aggregation Plan and determine whether to present this to the Town legislative body for approval at the March Town Meeting: to be determined
4. Town Meeting approves or reject the Community Power Plan and Program in March 2022
5. If approved, the Town submits the Community Power Program to the PUC and/or State Energy Commission for approval: expected in April-June 2022

6. Implementation of the Program begins in accordance with the Plan: begins following PUC approval

7. The Town contracts with the Community Power Coalition of New Hampshire or other third party to provide services to implement the plan, including acquiring contracts for electric energy delivery.

8. If energy costs are at or below existing default energy rates, program is launched for eligible customers in Exeter

5. *Exeter is a member of the Community Power Coalition of New Hampshire. Can you explain what the Coalition is and what role they may have in Exeter's CPA.*

The Community Power Coalition of New Hampshire is a newly incorporated public entity in New Hampshire formed under RSA 53-A which allows municipalities and counties in NH to work in combination to perform any task or duty they can do individually. CPCNH has been incorporated with 12 initial member municipalities, including Exeter, to assist towns in NH who undertake community power programs. As envisioned, they will provide four key services: first to provide technical assistance to towns who are developing community power programs; second to aggregate electricity demand from member communities who choose to participate to create greater bargaining power when purchasing electric power contracts, third to provide technical services to towns such as purchasing power contracts, and establishing risk management strategies and reserves to respond to volatility in electricity markets, and fourth, to develop innovative alternative energy, grid modernization and other projects in which member communities can choose to participate. Exeter is one of the initial incorporating members of the coalition. Although a member of the Coalition, Exeter is not committed to use its services if and when it implements its community power program. We can choose to contract with another community power service provider if we choose. The coalition will be funded from revenues generated from its power contracts. No local taxpayer funds will be used.

6. *If Exeter’s energy aggregation plan (EAP) is approved by the Select Board and adopted by town vote at Town Meeting, will I be required to participate in the community power program? How will customers be notified and can they decide not to participate in Exeter Community Power if they so choose?*

In a word, NO, you will not be required to participate in the Exeter Community Power program. However, you will be automatically included unless you *opt out.* But the law is very clear on this point: all customers must be given ample notice (notice which must include the electric rates offered under the program mailed to every Unitil customer) and adequate timeframe (at least 30 days) to choose to opt out. You will also have the ability to opt out of the program later if you choose. If you already receive power from an alternative provider, you will not be included in Exeter’s program unless to choose to *opt in.* And remember, the Community Power program will not launch if the default energy rate we offer is not equal to or below that of the utility default rate.
7. Unitil is the utility that currently supplies Exeter’s electricity needs. What services does Unitil provide now and how will its role change if Exeter forms a CPA and adopts an energy aggregation plan?

Unitil’s role will largely remain the same as now. It will still provide the distribution of energy to your home or business and will continue to handle billing for electricity. It will also still provide the default electricity supplier for those who choose to opt out of Exeter’s program. The main difference for those who don’t opt out is that the electric supplier charges (included as a line item in your bill) will come from Exeter Community Power instead of Unitil’s default supplier.

8. *Can you explain a little more about the difference between electric delivery charges and electric supplier charges that I currently see on my Unitil bill? What will change on my bill if I decide to participate in Exeter Community Power?*

The only change (unless you have opted-out) will be that the portion of your bill labeled “ELECTRIC SUPPLIER SERVICE” will change from the default supplier to Exeter Community Power and may indicate the specific power option you have chosen (for example a higher renewable energy source mix). The “ELECTRIC SERVICE” portion of your bill (including “Customer Charge”, “Delivery Charge”, and “Stranded Cost Charge” will remain unchanged.

9. *What choice will individual consumers have concerning the source of their electric supply? Will individual customers be able to choose options with varying amounts of renewable energy?*

As mentioned earlier, a major reason that Community Power is being developed by Exeter is to provide electric customers greater opportunity to choose a larger portion of renewable energy in the “Energy Supplier” portion of their bill. Our intention is to offer two or three new mixes in addition to the default supply equivalent. The current default supply includes about 20% in renewable sources. We intend to add one ‘tier’ that includes about 50% renewable sources and another with a much greater portion of renewable sources – perhaps 90% or more.

10. *How will low-income customers be accommodated*

We don’t anticipate there will be any change in assistance available to low-income households as a result of shifting to a community power energy supplier model. The statewide Electric Assistance Program (EAP) provides qualifying customers with a discount on their monthly electric bill ranging from 8% to 76% depending on income and other factors. The New Hampshire Legislature authorized funding for this statewide program as part of electric utility deregulation back in the 1990s. Since then, all electric utility ratepayers support the statewide EAP through the System Benefits Charge (SBC) portion of their monthly electric bill. Funds to support the energy assistance program available to Exeter residents will continue to be available through Southern New Hampshire Services throughout the state to identify and enroll eligible customers for the statewide EAP. Other energy assistance programs for weatherization efficiency upgrades under the NHSaves program will be unchanged.
11. If Exeter adopts an energy aggregation plan (EAP) that authorizes its CPA to work with vendors to purchase electricity for the town’s residents and businesses, what are the risks to those residential and commercial customers?

The risk to customers is small. While it is certainly true that energy markets can be volatile and contracted costs for energy can swing significantly, Exeter Community Power will not be purchasing power directly, but rather through a third-party broker, either CPCNH or a private entity. A key part of the services provided by that broker is the management of energy pricing risk and hedging against this volatility. In addition, customers will be allowed to change their energy supplier either back to Unitil’s default or to another energy supplier on either a monthly or quarterly basis.

12. Currently Unitil and the PUC set the rates for its electricity customers. Who will set the rates if Exeter forms a CPA?

Exeter Community Power will establish the rate for only the ‘Energy Supply’ portion of customer’s electricity bill. The remainder consists of Electric Service charges (made up of customer charge, delivery charge, stranded cost charge, system benefits charge and taxes) are set by the utility and the PUC. For a New Hampshire household with the average electric energy demand of 630 kWh/month, at current Unitil rates, the energy supply portion would consist of about 39% on the monthly bill with the balance being electric delivery and service charges.

13. Have other communities in New Hampshire established CPAs and if so, where are they in the process and how successful have they been?

This is rapidly evolving, but as of mid October 2021, at least four other communities in New Hampshire are well along in the process of establishing community power programs, including Keene, Harrisville, Lebanon, and Hanover. All have drafted their Electric Aggregation Plans, and Keene has approved and launched its program using Standard Power/Good Energy as their energy broker/service provider. A total of fourteen NH municipalities have formally joined the CPCNH to support development of their community power programs: Hanover, Lebanon, Exeter, Nashua, Harrisville, Rye, Dover, Warner, Walpole, Newmarket, Plainfield, Durham, Enfield, and Cheshire County.

14. If it goes forward, when do you expect Exeter’s CPA to begin.

Based on the timeline the ECPAC has developed, we expect the Exeter Community Power Aggregation program to be considered by the Select Board this December or January, and for approval by Town Meeting in March 2022. If approved, and with the approval of our Energy Aggregation Plan by the PUC, we anticipate contracting for energy services in Summer of 2022 and beginning to provide energy supply services to Exeter customers in the Fall 2022 / Winter 2023. This schedule is tentative and may be delayed by the approval and roll out process governed by the PUC and the newly formed NH Department of Energy, and/or the availability of energy services provided through CPCNH and other providers.
APPENDIX 5: PUBLIC HEARING NOTICE
NOTICE OF PUBLIC HEARINGS

Exeter Community Power Electric Aggregation Plan

November 29, 2021 7:00 PM
Nowak Room
Exeter Town Hall, 10 Front Street, Exeter NH

and

December 13, 2021 7:00 PM
Nowak Room
Exeter Town Hall, 10 Front Street, Exeter NH

Two public hearings will be held at the above indicated dates, times and locations to present information and receive comments about the proposed Exeter Community Power Electric Aggregation Plan prepared by the Exeter Community Power Aggregation Committee. At these hearings, members of the Committee will present the Draft Energy Aggregation Plan, answer questions and take public comment. Copies of the Draft Plan will be available for review at the Exeter Public Library and in the Planning Office at the Exeter Town Offices and available on the Committee webpage prior to the hearings. Information pertaining to the Energy Community Power program and Energy Aggregation Plan is available on the Town website at the following address: https://www.exeternh.gov/bcc-cpac

Presentation and Hearing

Agenda

1. Welcome/Introductions
2. What is Community Power?
3. Steps to Develop a Community Power Program in Exeter
4. Review of Draft Aggregation Plan for Exeter
5. Next Steps
6. Public Hearing – Questions & Comments
APPENDIX 6: OVERVIEW OF THE COMMUNITY POWER COALITION OF NEW HAMPSHIRE (CPCNH)
Exeter is a founding member of the Community Power Coalition of New Hampshire (CPCNH), a nonprofit joint powers agency authorized under RSA 53-A and governed by participating communities under the terms of the Joint Powers Agreement unanimously approved by Exeter’s Select Board on May 10, 2021.

The Joint Powers Agreement is available on the Coalition’s webpage (https://www.cpcnh.org/about). The agreement includes the nonprofit’s Bylaws and Articles of Agreement, and details the common purpose, authorities, structure, Board of Directors, committees, cost sharing principals, liability protections, and other aspects of the organization.

Joint powers agencies are governed by communities, operated on a not-for-profit basis, and allow Community Power programs to voluntarily join forces to take advantage of economies of scale and shared services to boost operational efficiencies.

The public power industry has created over seventy joint powers agencies in the last fifty years, and several hundred local governments operate Community Power programs through joint powers agencies or comparable collaborative governance structures in Massachusetts, New York, Ohio, Illinois, and California.

The experience of these markets demonstrates that the economics of joint purchasing can enable access to advanced services and expertise for participating Community Power programs, which helps keep power rates competitive and supports long-term financial stability.

1. Coalition Governance Structure

The Coalition was incorporated on October 1, 2021 by the following founding local government Members: the cities of Lebanon, Nashua and Dover; the towns of Hanover, Harrisville, Exeter, Rye, Warner, Walpole, Plainfield, Newmarket, Enfield and Durham; and Cheshire County (https://www.cpcnh.org/incorporation-article). The towns of Hudson, Pembroke and Webster joined after incorporation.

Municipalities that adopt the Joint Powers Agreement in the future may subsequently apply for membership in the Coalition under the terms and procedures provided for under the joint powers agreement.

Each Member has appointed a Director and Alternate to serve on the Coalition’s Board of Directors. The Board will directly oversee the initial startup and implementation activities of the Coalition.

Exeter and all founding members will be directly represented on the Coalition’s Board until more than twenty-one (21) members join, at which point directors will be elected by vote of the members’ representatives at annual meetings (with a Board size of between 11 and 21 representatives, at the members’ direction).
Additionally, to exercise more regular oversight over specific aspects of the joint powers agency, the Coalition will have six standing committees: Executive, Finance, Audit, Regulatory and Legislative Affairs, Risk Management and Governance. The Board may also establish ad-hoc committees — and has already established the “Member Operations & Advisory Committee” as such — and each direct project that members choose to pursue in the future will be overseen by a committee specific to that project.

All meetings of the Coalition are posted online ([https://www.cpcnh.org/calendar](https://www.cpcnh.org/calendar)) and comply with New Hampshire’s Right-to-Know Law (RSA 91-A) — the purpose of which is to “ensure both the greatest possible public access to the actions, discussions and records of all public bodies, and their accountability to the people”, based on the recognition that “openness in the conduct of public business is essential to a democratic society.”

2. Coalition Member Benefits

The Coalition is governed “for communities, by communities” under a voluntary and flexible membership structure, will provide competitive electricity service on a statewide basis, and will strengthen the ability of communities to coordinate effectively on public advocacy issues.

The 16 members of the Coalition ([https://www.cpcnh.org/members](https://www.cpcnh.org/members)) represent more than 245,000 residents, or about 18% of the population of New Hampshire. To put the anticipated electricity usage of all Coalition Members Community Power programs in context, at full enrollment of all eligible customers, the Coalition would be approximately equivalent in size to the default service load of both Unitil and the New Hampshire Electric Coop on an individual basis, which is larger than Liberty Utilities’ default service load and smaller than Eversource (New Hampshire's largest investor-owned distribution utility).

Based on the design and projected size of the Coalition, the Exeter Community Power Aggregation Committee anticipates that implementing community power in Exeter though CPCNH will result in cost savings, lower staff requirements and enhanced access to innovative energy services.

The Exeter Electric Aggregation Plan anticipates relying upon the Coalition’s member services to launch and operate Exeter Community Power, but approval of this plan does not commit the Select Board to doing so. The Select Board retains the authority to contract for any and all required program services and electricity supplies, and to pursue projects independently of the Coalition. (See explanation of alternative program organization models in Section 4 of the Plan.)

The Coalition was created to provide municipalities across New Hampshire with a number of distinct benefits in terms of transparency, scope and cost of Community Power services, regulatory and policy engagement, local program options, quality of energy risk management advice, the accrual of financial
reserves sufficient to ensure long-term financial stability, and opportunities to develop new energy projects.

These benefits are summarized in the “Coalition Member Services” and “Regulatory and Policy Advocacy” sections below, and additional details are available online (https://www.cpcnh.org/services):

A. Coalition Member Services

The Coalition’s business model has been designed to provide Community Power programs with:

- **Innovative local programs and customer services**: new rates, technologies and services for customers that lower electricity supply costs and risk for the program in aggregate, along with the electricity bills of participating customers from a “full bill” perspective (i.e., inclusive of transmission and distribution charges).

- **Energy Risk Management & Financial Reserve Policies, Procedures and Practices**: expert guidance on energy risk management, procurement of a diversified portfolio of energy contracts, rate setting, and financial reserves — sufficient to ensure the stability and operational continuity of Community Power programs over the long-term (as technologies, market dynamics, risk factors, consumer preferences and energy policies continue to evolve).

- **Development of Renewable and Battery Storage Projects**: joint contracting opportunities for the construction of new renewable and battery storage projects financed under long-term contracts — to diversify program energy portfolios, provide a physical hedge against wholesale market price fluctuations, enhance the resiliency of our electrical grid, and stimulate local construction and economic development.

The Coalition intends to contract with qualified vendors and credit-worthy suppliers to provide the services, credit support and electricity required to launch and operate Community Power programs. These third parties are expected to fund the upfront cost of implementing Community Power programs, the expense of which would be amortized and recovered for a specified term, along with ongoing operating costs, in customer rates.

The extent of services offered by the Coalition is expected to thereafter expand over time, in response to new market opportunities and ongoing regulatory rule reforms, and to meet the local objectives of participating Community Power programs. The Coalition also plans to hire a small number of qualified staff to ensure effective oversight of operations, as well as enhanced transparency and expert management as the Coalition’s business operations evolve.

B. Coalition Public Advocacy

Changes in law and regulations that adversely impact Community Power programs will be a non-trivial source of risk for Exeter Community Power.

Additionally, extending and maintaining the full range of benefits that Exeter Community Power could create for customers will require informed participation and advocacy on energy issues at the Legislature and Public Utilities Commission.

Coordination with other municipalities and Community Power initiatives on matters of common interest through the Coalition have already produced meaningful results in these areas. For example, over the last year, the communities involved in the formation of the Coalition have:

- **Participated in the Community Power informal rule drafting process**, including by providing the initial and subsequent draft rules for discussion, arranging bilateral meetings with utilities and other stakeholders, and leading significant portions of the subsequent stakeholder workshops at the request of Public Utilities Commission staff.
• Intervened in regulatory proceedings to represent the interests of customers and Community Power programs, such as by advocating for expanded data access in the Commission’s Statewide Data Platform docket (DE 19-197), under which a settlement agreement with the utilities was negotiated and recently submitted to the Public Utilities Commission. (If adopted, the settlement would create a “Statewide Data Platform” to enable data access for customers and Community Power programs, which would be overseen by a Governance Council that includes Coalition representatives.)

• Testified in legislative hearings — and organized hundreds of people, elected officials and civic organizations to register in support of the Coalition’s position on key legislation — in order to successfully negotiate critical amendments to two bills recently signed into law:
  o House Bill 315, which clarifies and expands key Community Power authorities; and
  o Senate Bill 91, which expands battery storage options for customers as well as Net Energy Metering for communities and established a committee to study the creation of a new market that would expand the ability of Community Power programs to buy from in-state generators and battery storage projects (under 5 megawatts in size).

Exeter Community Power will continue and expand on these activities through the Coalition.

3. Coalition Cost Sharing Structure & Contracting Process

Under the terms of New Hampshire’s Community Power law (RSA 53-E):

• Community Power programs must be self-funded, with ongoing costs paid for using the revenues generated by participating customers.

• Municipalities are only allowed to incur incidental costs associated with implementing Community Power programs, such as the costs necessary to comply with the Community Power law, up to the time that the program starts to produce revenue from participating customers.

Membership in the Coalition, and the implementation of Exeter Community Power, will not require any upfront cost for the Town other than such incidental expenses (i.e., the staff time, counsel review of agreements, and other costs required to comply with the Community Power law).

To provide the services, credit support and electricity supply required to launch and operate Exeter Community Power:

• The Coalition will administer competitive solicitations on behalf of all participating Community Power programs to contract with qualified vendors and credit-worthy suppliers.

• Vendors are expected to fund and self-manage the upfront cost of launching Community Power programs, under at-risk and performance-based contract structures with payments contingent upon successful launch.

• Program implementation costs for Exeter, along with ongoing operational and power procurement expenses, will be factored into the customer rates adopted by the Select Board and be recovered from the revenues received from participating customers after the launch of Exeter Community Power.

Similar solicitations and at-risk, performance-based contract structures have been used to successfully launch and operate new joint powers agencies in other Community Power markets.

Exeter’s representatives on the Coalition’s Board of Directors will participate in the solicitation of services, agency startup activities and the development of a cost-sharing agreement with other founding members.

The Coalition’s Joint Powers Agreement provides certain requirements regarding how costs will be tracked and shared across participating Community Power programs, which will guide the development of the Coalition cost-sharing agreement:
• Costs will be tracked in three distinct categories: direct project costs, member services, and general and administrative costs (which are overhead costs that are not associated with any specific project or member service);

• Member cost-sharing agreements will be the same in all material respects: general and administrative costs will be allocated based on each Community Power program’s share of total electricity usage each year, while each member will choose and separately pay for the costs of specific services and projects (under terms that reflect a fair allocation across all the members that chose the same services and projects); and

• The debts, liabilities and obligations of the Coalition, and of other participating Community Power programs, will be non-recourse to Exeter (unless expressly agreed to by the Select Board under Exeter’s Cost Sharing Agreement or a Project Contract).

The Coalition intends to contract for all the services required to launch and operate member Community Power programs, which is expected to enable access to advanced services and expertise at least cost for Exeter Community Power. However, note that:

• The Town will be under no obligation to rely on the services provided through the Coalition until the Select Board executes the Coalition’s cost-sharing agreement and chooses which services will be provided through the Coalition.

• At that time, the Select Board may decide to rely on the Coalition for all or a subset of the services required to launch and operate Exeter Community Power. Additionally, if the Select Board decides to rely on the Coalition to provide all-requirements electricity supply to Exeter Community Power’s customers, the Select Board will also review and adopt an Energy Risk Management and Financial Reserves Policy provided by the Coalition. The program’s power procurement will be governed by this agreement, such that the Coalition will, for example, procure power with the renewable content specified by the Town and balance cost objectives to meet the program’s rate-setting goals.

• Alternatively, the Select Board could decide to withdraw from the Coalition entirely, prior to executing the cost-sharing agreement, and launch Exeter Community Power independently.

• Lastly, after Exeter Community Power launches, the Town could still decide to procure certain services independently or to withdraw from the Coalition at a future date, subject to the terms, conditions and any continuing obligations specified in the cost-sharing agreement approved by the Select Board.

Decisions made by the Select Board regarding how to best implement and operate Exeter Community Power, including the execution of the Coalition cost-sharing agreement and selection of services provided through the Coalition, will be made at duly noticed public meetings.


Exeter Community Power’s ability to maintain competitive rates, as market prices and Unitil’s default rates change over time, is a primary goal for the program. Competitive rates will significantly reduce the risk that customers opt-out of Exeter Community Power and allow the program to achieve our medium- to long-term goals.

To that end, working with the other members of the Coalition, Exeter Community Power will adopt an Energy Risk Management and Financial Reserve Policy. The purpose of this policy is to:

• Ensure that Exeter Community Power allocates customer revenues in ways that balance our community’s goals and objectives over the short-to-long term; and

• Define how the Coalition will conduct energy risk management, procurement and market operations on behalf of Exeter Community Power (so that the Coalition remains in compliance with our policy).
Combined with the operational procedures and practices of the Coalition’s business model, these policies are designed to ensure that Exeter Community Power and all participating members of the Coalition will be able to:

- Foresee, forecast and adequately plan for adverse contingencies (such as power supply shocks, economic downturns and changes in policy and regulations);
- Structure and manage a diversified portfolio (or “book”) of physical and financial energy contracts in order to (1) hedge price risk in an optimal fashion by assessing the cost of entering into forward contracts against the risk of wholesale market price exposure, (2) transact quickly to take advantage of changing market conditions and (3) incorporate energy contracts from a variety of preferred sources (e.g., renewables and battery storage assets, local generators, customer-generators and demand response programs, etc.);
- Maintain competitive rates, and additionally set aside funds to accrue financial reserves, while also implementing local programs (designed in ways that lower portfolio costs and risk factors);
- Draw on financial reserves or credit support sufficient to maintain (1) rate stability for participating customers and (2) adequate cash flow for the Coalition’s operations over the course of any adverse events and periods.

As Exeter Community Power accrues financial reserves, the Coalition will be able to facilitate additional ways to lower costs, create new value, and further enhance the financial stability of the program. As one example, the accrual of sufficient reserves will allow Exeter Community Power to begin self-providing the collateral required for wholesale power market transactions and power purchase agreements. This will lower the capital costs and risk premiums otherwise embedded into the price of power contracts negotiated by the Coalition. Similarly, the Coalition also intends to facilitate joint project development opportunities across participating Community Power programs, and to explore opportunities to jointly satisfy collateral obligations within these arrangements.

Lastly, the combination of the Coalition’s approach to energy portfolio risk management and the accrual of sufficient financial reserves by participating members is what will enable Exeter Community Power to enter into long-term contracts — in order to construct new renewable and battery storage projects.

5. Coalition Design & Start Up Process To-Date

The Coalition “Organizing Group” was initially convened in December 2019, with communities interested in Community Power meeting regularly to research national best practices and explore the viability of establishing a collaborative nonprofit to share services across municipalities and counties:

- The Coalition’s initial Organizing Group consisted of the cities of Lebanon and Nashua, the towns of Hanover and Harrisville, and Cheshire County;
- Technical and community advisors included representatives from both Thayer School of Engineering and Tuck School of Business at Dartmouth, the Monadnock Sustainability Hub, Clean Energy New Hampshire, Growing Edge Partners and Community Choice Partners, Inc.;
- Activities were carried out in four working group tracks: Governance Agreements, Regulatory and Policy Engagement, Design and Implementation, and Community Engagement.

Members of the Coalition’s Organizing Group have:

- Participated in the Community Power informal rule drafting process, including by providing the initial and subsequent draft rules for discussion, arranging bilateral meetings with utilities and other stakeholders, and leading significant portions of the subsequent stakeholder workshops at the request of Public Utilities Commission staff;
• Intervened in regulatory proceedings and legislative hearings to represent the interests of communities and customers, such as by advocating for expanded data access in the Commission’s Statewide Data Platform docket, DE 19-197, and successfully negotiating the clarification and expansion of key Community Power authorities in House Bill 315;

• Assessed power agency design best practices — in terms of public governance and competitive operating models — by interviewing elected officials, senior staff and vendors operating Community Power programs in other states, along with representatives from public power associations (such as the American Public Power Association and the Vermont Public Power Supply Authority) and other industry experts; and

• Hosted a virtual summit on Community Power that was attended by over eighty representatives from thirty-one municipalities, collectively representing one-quarter of the state’s default electricity market.

The City of Lebanon, using grant funding and in collaboration with the Organizing Group executed legal, community engagement and professional service contracts to help formally establish and implement the Community Power Coalition of New Hampshire.

A. Joint Powers Agreement Drafting Process

The Organizing Group began by surveying other Community Power states and the broader public power industry, assessed the legal and governance structure of a selection of successful nonprofit power agencies that provide services to multiple municipal members, and interviewed staff and elected officials involved.

After discussing joint governance issues and reviewing the governance documents of comparable entities, the Organizing Group created a draft Joint Powers Agreement for the Coalition in July 2020. In September 2020, the City of Lebanon and Town of Hanover, in collaboration with the Organizing Group, reviewed six responses to a Request for Qualifications and retained the legal services of Duncan, Weinberg, Genzer & Pembrooke, P.C. (DWGP). The firm was hired to provide advice on key aspects of joint power agency governance and to finalize the Coalition’s Joint Powers Agreement, in compliance with RSA 53-A., with additional support provided by New Hampshire counsel on a subcontracted basis. DWGP are national leaders with over 50 years in public power legal guidance, and the project was led by DWGP President Michael Postar Esq.

The Joint Powers Agreement was finalized in December 2020.

B. Community Outreach and Implementation Process

In February 2021, the City of Lebanon, using previously secured grant funding and in collaboration with the Coalition’s Organizing Group, contracted with Henry Herndon (formerly the Director of Local Energy Solutions at Clean Energy New Hampshire) and Samuel Golding, President of Community Choice Partners, Inc., to provide implementation support services prior to launch.

Mr. Herndon is facilitating branding and policy communication efforts, drafting an outreach strategy, compiling resources and facilitating the engagement of prospective members, and onboarding new members and their representatives throughout the state to the Coalition.

Mr. Golding is advising on Community Power rule development at the Public Utilities Commission and other regulatory and legislative affairs, drafting Electric Aggregation Plans and supporting municipalities through the local approval process, creating educational materials and presentations, drafting a business plan and budget for the Coalition, advising on Board policies and staffing, preparing vendor surveys and a request for proposals for the services and financing required to launch Community Power programs, and assisting in the bid evaluation, award and contracting process.
C. Incorporation, Organizational Development & Request for Services Process

Since incorporating as a Joint Powers Agency and government instrumentality on October 1st, 2021, the Coalition’s Board of Directors has grown to 34 representatives — elected officials, staff and volunteers serving on local energy committees — appointed by each of the Coalition’s 16 member communities to serve as either a Director or Alternate Director.

The Board moved quickly to establish an Executive Committee, Finance Committee, Member Operations & Engagement Committee, Risk Management Committee and to put in place the structures, protocols and work plans required to commence the process of launching the power enterprise. At present, the Regulatory & Legislative Affairs Committee and Governance Committee are under formation as well.

Most recently, on December 17th 2021, the Coalition issued a Request for Information (RFI) for operational services and credit support. The solicitation is available online (https://www.cpcnh.org/solicitations) and accompanied by substantial reference documentation (such as the Coalition’s draft Business Plan).

Additionally, Duncan, Weinberg, Genzer & Pembroke, P.C. was hired by the Coalition to provide legal services, and to act as General Counsel for the power agency, throughout its startup and early-stage operations.
APPENDIX 7: AVAILABLE UTILITY DATA

Electrical Use Data by Property Class - Town of Exeter (2019 2020)

Customer Migration Report – Unitil System Wide
## Electrical Use Data by Property Class - Town of Exeter (2019 2020)

<table>
<thead>
<tr>
<th>Year</th>
<th>Month</th>
<th>Property Class</th>
<th>Count</th>
<th>Billed kWh</th>
<th>Billed Dem</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>01</td>
<td>1 - RESIDENTIAL</td>
<td>7,162</td>
<td>5,002,861</td>
<td>19</td>
</tr>
<tr>
<td>2019</td>
<td>01</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,070</td>
<td>7,193,587</td>
<td>22,622</td>
</tr>
<tr>
<td>2019</td>
<td>02</td>
<td>3 - MUNICIPAL</td>
<td>823</td>
<td>694,008</td>
<td>2,473</td>
</tr>
<tr>
<td>2019</td>
<td>02</td>
<td>1 - RESIDENTIAL</td>
<td>7,142</td>
<td>4,614,265</td>
<td>15</td>
</tr>
<tr>
<td>2019</td>
<td>02</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,070</td>
<td>7,356,661</td>
<td>22,698</td>
</tr>
<tr>
<td>2019</td>
<td>02</td>
<td>3 - MUNICIPAL</td>
<td>823</td>
<td>730,875</td>
<td>2,521</td>
</tr>
<tr>
<td>2019</td>
<td>03</td>
<td>1 - RESIDENTIAL</td>
<td>7,148</td>
<td>4,146,625</td>
<td>23</td>
</tr>
<tr>
<td>2019</td>
<td>03</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,065</td>
<td>6,980,221</td>
<td>22,678</td>
</tr>
<tr>
<td>2019</td>
<td>03</td>
<td>3 - MUNICIPAL</td>
<td>823</td>
<td>637,123</td>
<td>2,514</td>
</tr>
<tr>
<td>2019</td>
<td>04</td>
<td>1 - RESIDENTIAL</td>
<td>7,191</td>
<td>3,555,378</td>
<td>8</td>
</tr>
<tr>
<td>2019</td>
<td>04</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,075</td>
<td>7,044,516</td>
<td>22,380</td>
</tr>
<tr>
<td>2019</td>
<td>04</td>
<td>3 - MUNICIPAL</td>
<td>823</td>
<td>655,414</td>
<td>2,604</td>
</tr>
<tr>
<td>2019</td>
<td>05</td>
<td>1 - RESIDENTIAL</td>
<td>7,299</td>
<td>3,445,380</td>
<td>54</td>
</tr>
<tr>
<td>2019</td>
<td>05</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,088</td>
<td>7,319,235</td>
<td>45,957</td>
</tr>
<tr>
<td>2019</td>
<td>05</td>
<td>3 - MUNICIPAL</td>
<td>825</td>
<td>740,529</td>
<td>5,359</td>
</tr>
<tr>
<td>2019</td>
<td>06</td>
<td>1 - RESIDENTIAL</td>
<td>7,304</td>
<td>3,171,293</td>
<td>22</td>
</tr>
<tr>
<td>2019</td>
<td>06</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,086</td>
<td>7,141,089</td>
<td>22,453</td>
</tr>
<tr>
<td>2019</td>
<td>06</td>
<td>3 - MUNICIPAL</td>
<td>823</td>
<td>707,775</td>
<td>2,791</td>
</tr>
<tr>
<td>2019</td>
<td>07</td>
<td>1 - RESIDENTIAL</td>
<td>7,309</td>
<td>4,980,963</td>
<td>22</td>
</tr>
<tr>
<td>2019</td>
<td>07</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,088</td>
<td>9,364,853</td>
<td>24,712</td>
</tr>
<tr>
<td>2019</td>
<td>07</td>
<td>3 - MUNICIPAL</td>
<td>823</td>
<td>753,877</td>
<td>2,575</td>
</tr>
<tr>
<td>2019</td>
<td>08</td>
<td>1 - RESIDENTIAL</td>
<td>7,298</td>
<td>5,045,851</td>
<td>23</td>
</tr>
<tr>
<td>2019</td>
<td>08</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,090</td>
<td>9,139,495</td>
<td>25,202</td>
</tr>
<tr>
<td>2019</td>
<td>08</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>786,582</td>
<td>2,683</td>
</tr>
<tr>
<td>2019</td>
<td>09</td>
<td>1 - RESIDENTIAL</td>
<td>7,300</td>
<td>3,381,239</td>
<td>21</td>
</tr>
<tr>
<td>2019</td>
<td>09</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,086</td>
<td>7,337,286</td>
<td>23,788</td>
</tr>
<tr>
<td>2019</td>
<td>09</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>711,284</td>
<td>3,084</td>
</tr>
<tr>
<td>2019</td>
<td>10</td>
<td>1 - RESIDENTIAL</td>
<td>7,306</td>
<td>3,529,100</td>
<td>6</td>
</tr>
<tr>
<td>2019</td>
<td>10</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,085</td>
<td>7,994,772</td>
<td>23,488</td>
</tr>
<tr>
<td>2019</td>
<td>10</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>788,687</td>
<td>3,011</td>
</tr>
<tr>
<td>2019</td>
<td>11</td>
<td>1 - RESIDENTIAL</td>
<td>7,185</td>
<td>3,652,253</td>
<td>9</td>
</tr>
<tr>
<td>2019</td>
<td>11</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,071</td>
<td>7,120,874</td>
<td>21,643</td>
</tr>
<tr>
<td>2019</td>
<td>11</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>745,396</td>
<td>2,847</td>
</tr>
<tr>
<td>2019</td>
<td>12</td>
<td>1 - RESIDENTIAL</td>
<td>7,213</td>
<td>4,217,888</td>
<td>9</td>
</tr>
<tr>
<td>2019</td>
<td>12</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,075</td>
<td>6,965,758</td>
<td>21,190</td>
</tr>
<tr>
<td>2019</td>
<td>12</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>731,898</td>
<td>2,661</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Year</th>
<th>Month</th>
<th>Property Class</th>
<th>Count</th>
<th>Billed kWh</th>
<th>Billed Dem</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>01</td>
<td>1 - RESIDENTIAL</td>
<td>7,212</td>
<td>4,884,604</td>
<td>12</td>
</tr>
<tr>
<td>2020</td>
<td>01</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,076</td>
<td>7,683,907</td>
<td>21,310</td>
</tr>
<tr>
<td>2020</td>
<td>01</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>766,709</td>
<td>2,558</td>
</tr>
<tr>
<td>2020</td>
<td>02</td>
<td>1 - RESIDENTIAL</td>
<td>7,201</td>
<td>4,527,287</td>
<td>12</td>
</tr>
<tr>
<td>2020</td>
<td>02</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,072</td>
<td>7,643,549</td>
<td>21,251</td>
</tr>
<tr>
<td>2020</td>
<td>02</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>759,994</td>
<td>2,455</td>
</tr>
<tr>
<td>2020</td>
<td>03</td>
<td>1 - RESIDENTIAL</td>
<td>7,234</td>
<td>4,202,411</td>
<td>16</td>
</tr>
<tr>
<td>2020</td>
<td>03</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,073</td>
<td>7,390,252</td>
<td>21,211</td>
</tr>
<tr>
<td>2020</td>
<td>03</td>
<td>3 - MUNICIPAL</td>
<td>822</td>
<td>632,938</td>
<td>2,540</td>
</tr>
<tr>
<td>2020</td>
<td>04</td>
<td>1 - RESIDENTIAL</td>
<td>7,219</td>
<td>3,775,081</td>
<td>6</td>
</tr>
<tr>
<td>2020</td>
<td>04</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,071</td>
<td>6,042,695</td>
<td>19,853</td>
</tr>
<tr>
<td>2020</td>
<td>04</td>
<td>3 - MUNICIPAL</td>
<td>820</td>
<td>441,131</td>
<td>2,255</td>
</tr>
<tr>
<td>2020</td>
<td>05</td>
<td>1 - RESIDENTIAL</td>
<td>7,332</td>
<td>3,485,702</td>
<td>3</td>
</tr>
<tr>
<td>2020</td>
<td>05</td>
<td>2 - COMM &amp; INDUSTR</td>
<td>1,092</td>
<td>5,866,274</td>
<td>19,859</td>
</tr>
<tr>
<td>2020</td>
<td>05</td>
<td>3 - MUNICIPAL</td>
<td>820</td>
<td>398,960</td>
<td>2,296</td>
</tr>
<tr>
<td>Year</td>
<td>Month</td>
<td>Property Class</td>
<td>Usage</td>
<td>Bill</td>
<td>Abnormality</td>
</tr>
<tr>
<td>------</td>
<td>-------</td>
<td>--------------------</td>
<td>--------</td>
<td>-------</td>
<td>-------------</td>
</tr>
<tr>
<td>2020</td>
<td>06</td>
<td>Residential</td>
<td>7,335</td>
<td>4,351,289</td>
<td>5</td>
</tr>
<tr>
<td>2020</td>
<td>06</td>
<td>Commercial &amp; Industrial</td>
<td>1,088</td>
<td>7,819,069</td>
<td>22,433</td>
</tr>
<tr>
<td>2020</td>
<td>06</td>
<td>Municipal</td>
<td>819</td>
<td>464,477</td>
<td>2,436</td>
</tr>
<tr>
<td>2020</td>
<td>07</td>
<td>Residential</td>
<td>7,341</td>
<td>5,390,645</td>
<td>6</td>
</tr>
<tr>
<td>2020</td>
<td>07</td>
<td>Commercial &amp; Industrial</td>
<td>1,088</td>
<td>8,681,968</td>
<td>24,095</td>
</tr>
<tr>
<td>2020</td>
<td>07</td>
<td>Municipal</td>
<td>820</td>
<td>550,007</td>
<td>2,481</td>
</tr>
<tr>
<td>2020</td>
<td>08</td>
<td>Residential</td>
<td>7,334</td>
<td>5,609,491</td>
<td>5</td>
</tr>
<tr>
<td>2020</td>
<td>08</td>
<td>Commercial &amp; Industrial</td>
<td>1,088</td>
<td>8,848,770</td>
<td>24,751</td>
</tr>
<tr>
<td>2020</td>
<td>08</td>
<td>Municipal</td>
<td>820</td>
<td>629,292</td>
<td>2,393</td>
</tr>
<tr>
<td>2020</td>
<td>09</td>
<td>Residential</td>
<td>7,399</td>
<td>4,278,618</td>
<td>7</td>
</tr>
<tr>
<td>2020</td>
<td>09</td>
<td>Commercial &amp; Industrial</td>
<td>1,090</td>
<td>8,434,865</td>
<td>23,295</td>
</tr>
<tr>
<td>2020</td>
<td>09</td>
<td>Municipal</td>
<td>820</td>
<td>719,952</td>
<td>2,386</td>
</tr>
<tr>
<td>2020</td>
<td>10</td>
<td>Residential</td>
<td>7,398</td>
<td>3,195,500</td>
<td>2</td>
</tr>
<tr>
<td>2020</td>
<td>10</td>
<td>Commercial &amp; Industrial</td>
<td>1,087</td>
<td>6,960,894</td>
<td>22,003</td>
</tr>
<tr>
<td>2020</td>
<td>10</td>
<td>Municipal</td>
<td>820</td>
<td>644,224</td>
<td>2,275</td>
</tr>
<tr>
<td>2020</td>
<td>11</td>
<td>Residential</td>
<td>7,296</td>
<td>3,544,745</td>
<td>0</td>
</tr>
<tr>
<td>2020</td>
<td>11</td>
<td>Commercial &amp; Industrial</td>
<td>1,073</td>
<td>6,755,717</td>
<td>21,008</td>
</tr>
<tr>
<td>2020</td>
<td>11</td>
<td>Municipal</td>
<td>820</td>
<td>636,085</td>
<td>2,126</td>
</tr>
<tr>
<td>2020</td>
<td>12</td>
<td>Residential</td>
<td>7,305</td>
<td>4,482,545</td>
<td>0</td>
</tr>
<tr>
<td>2020</td>
<td>12</td>
<td>Commercial &amp; Industrial</td>
<td>1,083</td>
<td>6,947,222</td>
<td>20,591</td>
</tr>
<tr>
<td>2020</td>
<td>12</td>
<td>Municipal</td>
<td>820</td>
<td>704,332</td>
<td>2,029</td>
</tr>
</tbody>
</table>
### CUSTOMER COUNT by CLASS

**Customers Served by Competitive Generation**

<table>
<thead>
<tr>
<th>Month</th>
<th>DOMESTIC</th>
<th>REGULAR GENERAL</th>
<th>LARGE GENERAL</th>
<th>OUTDOOR LIGHTING</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug-20</td>
<td>5,640</td>
<td>2,686</td>
<td>126</td>
<td>270</td>
<td>8,722</td>
</tr>
<tr>
<td>Sep-20</td>
<td>5,592</td>
<td>2,687</td>
<td>126</td>
<td>273</td>
<td>8,678</td>
</tr>
<tr>
<td>Oct-20</td>
<td>5,530</td>
<td>2,692</td>
<td>126</td>
<td>277</td>
<td>8,625</td>
</tr>
<tr>
<td>Nov-20</td>
<td>5,611</td>
<td>2,723</td>
<td>125</td>
<td>280</td>
<td>8,739</td>
</tr>
<tr>
<td>Dec-20</td>
<td>5,584</td>
<td>2,769</td>
<td>125</td>
<td>296</td>
<td>8,774</td>
</tr>
<tr>
<td>Jan-21</td>
<td>5,581</td>
<td>2,773</td>
<td>125</td>
<td>298</td>
<td>8,777</td>
</tr>
<tr>
<td>Feb-21</td>
<td>5,576</td>
<td>2,781</td>
<td>125</td>
<td>297</td>
<td>8,779</td>
</tr>
<tr>
<td>Mar-21</td>
<td>5,550</td>
<td>2,779</td>
<td>125</td>
<td>297</td>
<td>8,751</td>
</tr>
<tr>
<td>Apr-21</td>
<td>5,537</td>
<td>2,784</td>
<td>125</td>
<td>296</td>
<td>8,742</td>
</tr>
<tr>
<td>May-21</td>
<td>5,520</td>
<td>2,781</td>
<td>126</td>
<td>296</td>
<td>8,723</td>
</tr>
<tr>
<td>Jun-21</td>
<td>5,511</td>
<td>2,811</td>
<td>130</td>
<td>339</td>
<td>8,791</td>
</tr>
<tr>
<td>Jul-21</td>
<td>5,481</td>
<td>2,798</td>
<td>129</td>
<td>334</td>
<td>8,742</td>
</tr>
<tr>
<td>Aug-21</td>
<td>5,442</td>
<td>2,796</td>
<td>129</td>
<td>333</td>
<td>8,700</td>
</tr>
</tbody>
</table>

### CUSTOMER COUNT by CLASS

**Total Customers**

<table>
<thead>
<tr>
<th>Month</th>
<th>DOMESTIC</th>
<th>REGULAR GENERAL</th>
<th>LARGE GENERAL</th>
<th>OUTDOOR LIGHTING</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug-20</td>
<td>67,919</td>
<td>10,874</td>
<td>164</td>
<td>1,548</td>
<td>80,505</td>
</tr>
<tr>
<td>Sep-20</td>
<td>67,770</td>
<td>10,862</td>
<td>164</td>
<td>1,546</td>
<td>80,342</td>
</tr>
<tr>
<td>Oct-20</td>
<td>67,025</td>
<td>10,740</td>
<td>164</td>
<td>1,546</td>
<td>79,475</td>
</tr>
<tr>
<td>Nov-20</td>
<td>66,955</td>
<td>10,722</td>
<td>163</td>
<td>1,543</td>
<td>79,383</td>
</tr>
<tr>
<td>Dec-20</td>
<td>66,977</td>
<td>10,783</td>
<td>163</td>
<td>1,542</td>
<td>79,465</td>
</tr>
<tr>
<td>Jan-21</td>
<td>66,995</td>
<td>10,791</td>
<td>163</td>
<td>1,540</td>
<td>79,489</td>
</tr>
<tr>
<td>Feb-21</td>
<td>67,019</td>
<td>10,792</td>
<td>163</td>
<td>1,539</td>
<td>79,513</td>
</tr>
<tr>
<td>Mar-21</td>
<td>67,085</td>
<td>10,786</td>
<td>163</td>
<td>1,538</td>
<td>79,572</td>
</tr>
<tr>
<td>Apr-21</td>
<td>67,242</td>
<td>10,813</td>
<td>163</td>
<td>1,536</td>
<td>79,754</td>
</tr>
<tr>
<td>May-21</td>
<td>68,223</td>
<td>10,946</td>
<td>164</td>
<td>1,537</td>
<td>80,870</td>
</tr>
<tr>
<td>Jun-21</td>
<td>68,271</td>
<td>11,252</td>
<td>168</td>
<td>1,646</td>
<td>81,337</td>
</tr>
<tr>
<td>Jul-21</td>
<td>68,312</td>
<td>11,258</td>
<td>168</td>
<td>1,645</td>
<td>81,383</td>
</tr>
<tr>
<td>Aug-21</td>
<td>68,334</td>
<td>11,265</td>
<td>168</td>
<td>1,639</td>
<td>81,406</td>
</tr>
</tbody>
</table>

### CUSTOMER COUNT by CLASS

**Percentage of Customers Served by Competitive Generation**

<table>
<thead>
<tr>
<th>Month</th>
<th>DOMESTIC</th>
<th>REGULAR GENERAL</th>
<th>LARGE GENERAL</th>
<th>OUTDOOR LIGHTING</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug-20</td>
<td>8.3%</td>
<td>24.7%</td>
<td>76.8%</td>
<td>17.4%</td>
<td>10.8%</td>
</tr>
<tr>
<td>Sep-20</td>
<td>8.3%</td>
<td>24.7%</td>
<td>76.8%</td>
<td>17.7%</td>
<td>10.8%</td>
</tr>
<tr>
<td>Oct-20</td>
<td>8.3%</td>
<td>25.1%</td>
<td>76.8%</td>
<td>17.9%</td>
<td>10.9%</td>
</tr>
<tr>
<td>Nov-20</td>
<td>8.4%</td>
<td>25.4%</td>
<td>76.7%</td>
<td>18.1%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Dec-20</td>
<td>8.3%</td>
<td>25.7%</td>
<td>76.7%</td>
<td>19.2%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Jan-21</td>
<td>8.3%</td>
<td>25.7%</td>
<td>76.7%</td>
<td>19.4%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Feb-21</td>
<td>8.3%</td>
<td>25.8%</td>
<td>76.7%</td>
<td>19.3%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Mar-21</td>
<td>8.3%</td>
<td>25.8%</td>
<td>76.7%</td>
<td>19.3%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Apr-21</td>
<td>8.2%</td>
<td>25.7%</td>
<td>76.7%</td>
<td>19.4%</td>
<td>11.0%</td>
</tr>
<tr>
<td>May-21</td>
<td>8.1%</td>
<td>25.4%</td>
<td>76.8%</td>
<td>19.3%</td>
<td>10.8%</td>
</tr>
<tr>
<td>Jun-21</td>
<td>8.1%</td>
<td>25.0%</td>
<td>77.4%</td>
<td>20.6%</td>
<td>10.8%</td>
</tr>
<tr>
<td>Jul-21</td>
<td>8.0%</td>
<td>24.9%</td>
<td>76.8%</td>
<td>20.3%</td>
<td>10.7%</td>
</tr>
<tr>
<td>Month</td>
<td>DOMESTIC</td>
<td>REGULAR GENERAL</td>
<td>LARGE GENERAL</td>
<td>OUTDOOR LIGHTING</td>
<td>TOTAL</td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
<td>----------------</td>
<td>---------------</td>
<td>-----------------</td>
<td>----------</td>
</tr>
<tr>
<td>Aug-20</td>
<td>5,025,157</td>
<td>12,585,000</td>
<td>24,802,949</td>
<td>285,841</td>
<td>42,698,947</td>
</tr>
<tr>
<td>Sep-20</td>
<td>3,830,566</td>
<td>11,844,205</td>
<td>24,763,811</td>
<td>277,727</td>
<td>40,716,309</td>
</tr>
<tr>
<td>Oct-20</td>
<td>2,804,991</td>
<td>9,315,571</td>
<td>20,682,774</td>
<td>257,999</td>
<td>33,061,335</td>
</tr>
<tr>
<td>Nov-20</td>
<td>3,120,292</td>
<td>9,377,219</td>
<td>20,508,686</td>
<td>260,739</td>
<td>33,266,936</td>
</tr>
<tr>
<td>Dec-20</td>
<td>4,062,226</td>
<td>10,580,209</td>
<td>21,594,681</td>
<td>261,598</td>
<td>36,498,714</td>
</tr>
<tr>
<td>Jan-21</td>
<td>4,278,597</td>
<td>10,629,570</td>
<td>21,446,857</td>
<td>265,177</td>
<td>36,620,201</td>
</tr>
<tr>
<td>Feb-21</td>
<td>4,170,059</td>
<td>10,982,775</td>
<td>21,550,828</td>
<td>264,772</td>
<td>36,968,434</td>
</tr>
<tr>
<td>Mar-21</td>
<td>4,147,182</td>
<td>11,693,985</td>
<td>23,288,857</td>
<td>266,555</td>
<td>39,396,579</td>
</tr>
<tr>
<td>Apr-21</td>
<td>3,037,129</td>
<td>10,017,074</td>
<td>20,951,523</td>
<td>261,384</td>
<td>34,267,110</td>
</tr>
<tr>
<td>May-21</td>
<td>2,933,500</td>
<td>10,423,956</td>
<td>21,710,128</td>
<td>261,483</td>
<td>35,329,067</td>
</tr>
<tr>
<td>Jun-21</td>
<td>3,609,781</td>
<td>12,160,749</td>
<td>24,078,622</td>
<td>254,935</td>
<td>40,104,087</td>
</tr>
<tr>
<td>Jul-21</td>
<td>4,142,614</td>
<td>12,963,006</td>
<td>24,870,237</td>
<td>257,551</td>
<td>42,233,408</td>
</tr>
<tr>
<td>Aug-21</td>
<td>4,111,631</td>
<td>13,072,973</td>
<td>25,457,909</td>
<td>261,350</td>
<td>42,903,863</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>DOMESTIC</th>
<th>REGULAR GENERAL</th>
<th>LARGE GENERAL</th>
<th>OUTDOOR LIGHTING</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug-20</td>
<td>57,715,834</td>
<td>28,262,781</td>
<td>29,935,971</td>
<td>644,251</td>
<td>116,558,837</td>
</tr>
<tr>
<td>Sep-20</td>
<td>44,979,721</td>
<td>26,172,290</td>
<td>29,722,799</td>
<td>635,198</td>
<td>101,510,008</td>
</tr>
<tr>
<td>Oct-20</td>
<td>32,009,393</td>
<td>20,170,721</td>
<td>24,642,676</td>
<td>609,062</td>
<td>77,431,852</td>
</tr>
<tr>
<td>Nov-20</td>
<td>34,896,989</td>
<td>10,423,956</td>
<td>21,710,128</td>
<td>261,483</td>
<td>35,329,067</td>
</tr>
<tr>
<td>Dec-20</td>
<td>45,042,699</td>
<td>23,449,935</td>
<td>25,817,785</td>
<td>254,935</td>
<td>82,003,648</td>
</tr>
<tr>
<td>Jan-21</td>
<td>48,326,828</td>
<td>23,804,287</td>
<td>25,351,429</td>
<td>257,551</td>
<td>111,299,701</td>
</tr>
<tr>
<td>Feb-21</td>
<td>47,028,445</td>
<td>24,511,887</td>
<td>25,812,410</td>
<td>254,935</td>
<td>82,003,648</td>
</tr>
<tr>
<td>Apr-21</td>
<td>33,843,374</td>
<td>21,236,355</td>
<td>24,806,383</td>
<td>259,813</td>
<td>81,476,409</td>
</tr>
<tr>
<td>May-21</td>
<td>33,843,374</td>
<td>21,236,355</td>
<td>24,806,383</td>
<td>259,813</td>
<td>81,476,409</td>
</tr>
<tr>
<td>Jun-21</td>
<td>43,474,063</td>
<td>26,241,575</td>
<td>28,940,957</td>
<td>568,583</td>
<td>99,225,178</td>
</tr>
<tr>
<td>Jul-21</td>
<td>50,786,739</td>
<td>28,410,304</td>
<td>30,282,704</td>
<td>571,860</td>
<td>110,051,607</td>
</tr>
<tr>
<td>Aug-21</td>
<td>50,902,470</td>
<td>29,195,229</td>
<td>30,963,896</td>
<td>578,180</td>
<td>111,639,775</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>DOMESTIC</th>
<th>REGULAR GENERAL</th>
<th>LARGE GENERAL</th>
<th>OUTDOOR LIGHTING</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug-20</td>
<td>8.7%</td>
<td>44.5%</td>
<td>82.9%</td>
<td>44.4%</td>
<td>36.6%</td>
</tr>
<tr>
<td>Sep-20</td>
<td>8.5%</td>
<td>45.3%</td>
<td>83.3%</td>
<td>43.7%</td>
<td>40.1%</td>
</tr>
<tr>
<td>Oct-20</td>
<td>8.8%</td>
<td>46.2%</td>
<td>83.9%</td>
<td>42.4%</td>
<td>42.7%</td>
</tr>
<tr>
<td>Nov-20</td>
<td>8.9%</td>
<td>45.7%</td>
<td>83.9%</td>
<td>43.1%</td>
<td>41.4%</td>
</tr>
<tr>
<td>Dec-20</td>
<td>9.0%</td>
<td>45.1%</td>
<td>83.6%</td>
<td>43.8%</td>
<td>38.5%</td>
</tr>
<tr>
<td>Jan-21</td>
<td>8.9%</td>
<td>44.7%</td>
<td>84.6%</td>
<td>45.5%</td>
<td>37.3%</td>
</tr>
<tr>
<td>Feb-21</td>
<td>8.9%</td>
<td>44.8%</td>
<td>83.5%</td>
<td>45.6%</td>
<td>37.7%</td>
</tr>
<tr>
<td>Mar-21</td>
<td>8.8%</td>
<td>44.9%</td>
<td>84.3%</td>
<td>52.9%</td>
<td>38.9%</td>
</tr>
<tr>
<td>Apr-21</td>
<td>8.7%</td>
<td>47.2%</td>
<td>84.5%</td>
<td>45.1%</td>
<td>42.1%</td>
</tr>
<tr>
<td>May-21</td>
<td>8.7%</td>
<td>47.8%</td>
<td>84.3%</td>
<td>44.9%</td>
<td>43.1%</td>
</tr>
<tr>
<td>Jun-21</td>
<td>8.3%</td>
<td>46.3%</td>
<td>83.2%</td>
<td>44.8%</td>
<td>40.4%</td>
</tr>
<tr>
<td>Jul-21</td>
<td>8.2%</td>
<td>45.6%</td>
<td>82.1%</td>
<td>45.0%</td>
<td>38.4%</td>
</tr>
<tr>
<td>Aug-21</td>
<td>8.4%</td>
<td>44.0%</td>
<td>82.0%</td>
<td>45.0%</td>
<td>38.4%</td>
</tr>
</tbody>
</table>