



**COMMUNITY  
POWER COALITION  
OF NEW HAMPSHIRE**  
*For communities, by communities.*

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March 19, 2024

Hon. Michael Vose  
Chair, Science, Technology & Energy Committee  
New Hampshire House of Representatives  
107 North Main St.  
Concord, NH 03301

**RE: SB 391**, *relative to electric grid interconnection for certain customer generators.*

Dear Chairman Vose and Members of the House Science, Technology & Energy Committee,

On behalf of the [Community Power Coalition of New Hampshire](http://www.CommunityPowerCoalitionNH.org) (CPCNH), I write to **support** the passage of Senate Bill 391. CPCNH supports SB 391, which would require the DOE to initiate a proceeding to examine and assess draft rules for the purpose of setting uniform procedures for the interconnection of distributed energy resources (DER) smaller than 5 MW into the electric distribution system of New Hampshire's investor-owned utilities.

**We support SB 391 for the following reasons:**

✦ ***Demand for customer-sited distributed energy resources (DER) continues to increase rapidly, particularly in the 1 MW to 5 MW community-scale size, and NH needs a timely, cost-effective, and predictable process for the development of interconnection procedures, rules, and standards.***

Higher energy supply costs combined with increased federal stimulus investment have increased the attractiveness of customer-sited DER, particularly in the 1 MW to 5 MW, community-scale size. In August 2022, the Federal Energy Regulatory Commission (FERC) issued an Order Accepting Tariff Revisions regarding ISO New England Inc. et al. under ER22-2226-000. The ruling clarifies that DER interconnections to the distribution grid under 5 MW and not ISO-New England market participants, are purely state jurisdictional matters.<sup>1</sup> Unfortunately, as the interconnection queue continues to grow, the largest utility in the state has a serious backlog. To illustrate this growing demand for DER, particularly in the 1 MW to 5 MW community-scale

size in Eversource's territory, CPCNH learned through the discovery process in the PUC Net Metering docket (DE 22-060) that as of June 2023, Eversource had approximately 8,400 net metering (NEM) 2.0 customer-generators under 100 kW, 112 between 100 kW and 1 MW, and only 4 greater than 1 MW. As of September 30, 2023, Eversource had 3,069 pending interconnection requests in the up to 100 kW scale, 49 in the 100 kW to 1 MW scale, and 62 in the 1 MW to 5 MW scale.

Delays in the interconnection process jeopardize the ability to integrate new and more economical local energy resources. As NH communities and Community Power Aggregations (CPAs) look to interconnect their own DG installations such as solar PV, landfill biogas, energy storage including solar PV plus storage, run-of-river hydro, timely, cost-effective, and predictable process for the development of interconnection projects, rules, and standards will be essential to ensure that these projects come online at the pace and scale needed to serve communities and CPAs.

As a result of SB 262 of 2022, the NH Department of Energy (DOE) recently concluded a year-long investigation into interconnection (IP 2022-001) to "investigate [the] modification of the rules of the [PUC] in PUC 903.01(e) to ensure cost-effective, predictable, and timely interconnection procedures for customer generators to the state's electric distribution system."

In its final report, DOE concluded that "[s]takeholders generally agree on the need for clear, predictable, and timely interconnection rules, procedures, and standards, with maximum consistency among the utilities wherever warranted and reasonable," and recommended that a follow-on working group consider an update to NH's interconnection rules. Many stakeholders participated in the investigation and while some issues remained unresolved, CPCNH supports the advancement of a timely process to examine and assess draft rules as this bill prescribes. Once draft rules have been developed, CPCNH supports timely action through a rulemaking process.

***✦ Uniform interconnection procedures will benefit communities and CPAs who want to increase competition and customer choices for net metering, including within the construct envisioned under the bipartisan-supported HB 1600.***

CPCNH and its member communities envision a future with greater retail competition and customer choice for DER such as through net metering and market-based price signals. Thanks to the unanimous bipartisan support from this committee, HB 1600 – which would clarify that Group Net Metering programs with Municipal Hosts can be developed for CPAs when serving the CPA as a whole – validates that those competitive options exist for CPAs and their customers. In

order to ensure that those benefits are not blunted, timely action to develop uniform interconnection procedures are needed.

✦ ***The DOE should consider IREC model interconnection procedures, rules, and standards as a starting point to provide necessary certainty to customers, developers, and utilities and to attract further private and public investment.***

Up-to-date model interconnection rules which incorporate the latest industry best practices for integrating DER onto the distribution grid are essential for managing the queues and supporting timely and predictable development of DER. The Interstate Renewable Energy Council (IREC), a nonprofit organization, has taken a lot of the guesswork out interconnection procedures through the development of its [Model Interconnection Procedures, 2023](#). These model procedures are designed to “enable faster and less costly interconnection of DERs, while maintaining safety and reliability.”

It is important to develop and adopt uniform interconnection procedures to establish reasonable and enforceable standards that will provide greater timeliness, predictability, and cost-effectiveness to all stakeholders involved in the process and will enable and not hinder greater competition. Therefore, the DOE should consider the IREC Model Interconnection Procedures, 2023 as the starting point for its draft rules, with the goal of adopting a set of interconnection procedures that are tailored to New Hampshire’s needs.

In closing, **CPCNH represents both the customers that we serve and the voters to whom we are accountable**, and our interest is acute in transitioning to a more market-based and competitive retail market that will allow Granite State communities and the customers they serve the ability to accelerate the transition to an affordable, equitable, and sustainable energy future. If you have any questions, please do not hesitate to contact me. Thank you.

Respectfully,

/s/

Deana Dennis

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Community Power Coalition of New Hampshire

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