



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

January 23, 2018

The Honorable Kevin Avard  
Chair, Senate Energy and Natural Resources Committee  
State House, Room 103  
Concord, New Hampshire 03301

**Re: SB 446, relative to net energy metering limits for customer-generators**

Dear Chair Avard and Members of the Committee:

Thank you for the opportunity to comment on SB 446, relative to net energy metering limits for customer-generators. This bill amends the definition of eligible customer-generator in RSA 362-A:1-a, II-b to expand the total allowable peak generating capacity for net energy metering systems from one to five megawatts. Additionally, the bill allows facilities smaller than 20 megawatts in size to allocate up to five megawatts for net energy metering participation. As clean renewable energy supports our mission of fostering a clean environment, the New Hampshire Department of Environmental Services (NHDES) supports this bill.

The intent of net energy metering is to allow customer-generators to export the excess power generation from their eligible distributed electricity generation facilities to be used on the electric distribution system in real time. In return, they receive a credit for that generation, which they can use when they need to import power at a later time. This arrangement is advantageous as it allows entities to avoid unnecessary investment in energy storage, unless desired.

Under current law, the peak generating capacity for eligible facilities is one megawatt. The changes to the statutory language in RSA 362-A:1-a, II-b proposed by SB 446 will greatly expand the peak capacity for net energy metering projects in New Hampshire. Passage of this bill would enable businesses, local government, and manufacturers with sites capable of hosting larger projects to more fully take advantage of a project's potential generation capacity and meet a larger portion of their overall load, while reducing their reliance on fossil fuels for heat and power.

For customer-generators, whose project sites offer more renewable-energy-generation capacity than they can utilize, the excess generation could be utilized in group net energy metering arrangements. The intent of group net-metering is to allow customer-generators with excess generation capacity to become group hosts and share their surplus generation with other customers of the same electric distribution utility. This arrangement is advantageous to the New Hampshire customers who face physical or financial barriers that restrict their direct investment in renewable projects. Such group net energy metering arrangements can also be utilized by businesses and municipalities with multiple properties in the same electric distribution territory;

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a single renewable generation facility can be applied across the collective load. By allowing much larger net energy metering projects for individual entities and groups, SB 446 will enable greater investment in clean renewable distributed energy generation, which will improve environmental quality and reduce greenhouse gas emissions.

Thank you again for the opportunity to comment on SB 446. If you have any questions or require further information, please contact either Chris Skoglund, Climate and Energy Program Manager, Air Resources Division ([Christopher.Skoglund@des.nh.gov](mailto:Christopher.Skoglund@des.nh.gov), 271-7624) or Rebecca Ohler, Administrator, Technical Services Bureau ([Rebecca.Ohler@des.nh.gov](mailto:Rebecca.Ohler@des.nh.gov), 271-6749).

Sincerely,



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Robert R. Scott  
Commissioner

cc: Senators Avard, Birdsell, Fuller Clark, Gannon, Giuda, Gray, Innis, Kahn, Reagan, Sanborn, Watters, Representatives Vose, Backus, Barry, Seidel