



**Public Service  
of New Hampshire**

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A Northeast Utilities Company

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November 13, 2013

NHPUC 13NOV13PM4:13

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

RE: DE 13-090, Puc 300 Rules on Electric Service  
Written Comments of Public Service Company of New Hampshire

Dear Ms. Howland:

On September 26, 2013, the New Hampshire Rulemaking Register published a notice regarding the Puc 300 Rules on Electric Service. That notice called for a public hearing on November 6, 2013 and for written comments to be filed on or by November 13, 2013. Public Service Company of New Hampshire ("PSNH" or "Company") appeared and spoke at the November 6, 2013 public hearing and hereby incorporates those comments. For purposes of these written comments, PSNH provides the enclosed version of the rules with redlines and embedded comments reflecting PSNH's views and opinions on certain of the rules and proposed rules, and proposals for amendments to certain of the rules and proposed rules. Further, PSNH provides the below comments on specific rules to provide additional explanation or expansion on concerns with certain rules as described.

- As noted at the public hearing, PSNH recommends that certain meter testing requirements in Puc 305 be amended as proposed in PSNH's attached document.
- PSNH believes that proposed section Puc 306.06 regarding notification is in need of further review and revisions. Specifically:
  - The notification timeframe should be amended.
  - The rule should allow for notification by means other than a telephone call, such as email or text messages.

- As drafted, the requirements for notification are burdensome in that they require notification for nearly every system interruption since the notification is required for interruptions of 5 minutes or more. Further, the customer threshold for notification is too low to be workable.
  - The notification requirements are also vague in that they require notification, for example, for “municipal facilities” which could encompass many locations and facilities that have little or no impact on the system, safety or customers. Further, the rule includes a “catch-all” provision that covers any accident or event involving damage to property regardless of whether that damage has anything to do with providing safe and reliable service to customers and without any regard to the value or amount of damage done.
  - The reporting requirements are excessive for at least some events, particularly those of small scale.
- PSNH has additional concerns with Puc 306.09, and in particular the requirement to hold 2 drills per year. PSNH believes that due to the complexity and expense of such drills, holding 2 annually is excessive and may not provide any greater benefit than a single drill. PSNH would propose that in place of a second drill, individual meetings with municipalities be held. This would allow municipalities to understand the Company’s emergency preparedness and restoration process and would allow those municipalities to share their specific concerns and priorities with the Company.
  - With respect to the newly-proposed section 306.10 on physical and cyber security, PSNH has numerous concerns. While PSNH sets out some specific concerns below, and in the attached document, it reiterates its position that this rule should not be adopted at present. PSNH is not opposed to providing meaningful and timely information to the Commission about the security of its systems and facilities. PSNH, however, does not believe that this proposed rule will be workable as proposed and that there should be a dialogue with the Commission and interested stakeholders about the specific information the Commission desires to obtain and under what circumstances providing that information is necessary and appropriate. Also, at the public hearing in this rule making, the Commission noted that it has hired a consultant to review these matters and PSNH believes it premature to adopt a rule that may, even unintentionally, conflict with whatever recommendations its own consultant may make. PSNH believes that adding a rule later once the information is more clear will be a more effective and efficient process than adopting a rule now with particular requirements, and then seeking to require amendments to the rule and the requirements within it at another time.
    - As to PSNH’s specific concerns:
      - As a general matter, PSNH believes that the rule should be limited to critical systems and facilities – such as those that would have a material impact on customers or compromise the safe and reliable operation of the electrical system.

- The proposed reporting timeframe of 2 hours, regardless of the reason to report, is too short in some instances and may not be possible in instances where the Company is not immediately aware of an issue.
  - It is not clear from the federal laws and orders referenced what the contents of any plan are supposed to be.
  - PSNH presently follows mandated requirements of the North American Electric Reliability Corporation (“NERC”) for Critical Infrastructure Protection (“CIP”) for its critical infrastructure and critical cyber-assets. At a minimum, PSNH would propose that complying with those requirements would be sufficient to meet the Commission’s requirements, at least as to any critical infrastructure and critical cyber-assets of PSNH. PSNH’s NERC CIP Program includes notification requirements to the Commission. PSNH is willing to work with the Commission and its staff to provide further information through the existing NERC CIP program to those who have obtained the proper security clearance to review other materials as appropriate.
  - The reporting requirements for the Form E-37 are too broad in that they incorporate items such as vandalism, and cover items such as “loss of control” of “any portion” of the distribution system, which could happen in a storm or other circumstances. PSNH believes that the requirements for this report need to be more clearly defined and limited, if the form is adopted at all.
- On section Puc 307.10 on tree pruning, PSNH is generally in agreement with the recommendations of Until Energy Systems and Granite State Electric Company.
  - PSNH has other items of concern as noted in the body of the accompanying document.

Thank you for the opportunity to provide these comments. PSNH is more than willing to participate further in this process to ensure that the rules ultimately adopted are workable for the Company and that they provide the Commission with timely information that is relevant to the safe and reliable operation of PSNH’s system. PSNH requests that the Commission consider these comments and those from the public hearing and that a useful and usable set of regulations is produced. If you have any questions, please do not hesitate to contact me. Thank you for your assistance with this matter.

Very truly yours,



Matthew J. Fossum

Enclosures  
Cc: Service List