

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Electric Assistance Program

DOCKET NO. DE 18-057

Request for Approval to EAP Design Change

**Joint Petition of Public Service Company of New Hampshire d/b/a Eversource Energy
and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities
for Recovery of Costs of EAP Changes**

Pursuant to Order No. 26,132 (May 4, 2018) and N.H. Code Admin. Rule Puc 203.06, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (“Liberty”) hereby petition the Commission for recovery of costs relating to changes to their respective billing and customer information systems required to implement adjustments to the application of the Energy Assistance Program (“EAP”). In support of this Petition, Eversource and Liberty state the following:

1. On April 5, 2018, the EAP Advisory Board submitted a recommendation to the Commission seeking a change in the application of the EAP program in New Hampshire. As noted in that recommendation, the purpose of the EAP is to help low-income residential customers afford the vital services they receive from the electricity grid by providing a discount on electric bills of EAP participants. Historically, the discount had not been available for that portion of a bill comprising charges owed to a non-utility competitive energy supplier. The EAP Advisory Board had convened a subcommittee to consider options for applying the discount to the energy supply charges of competitive energy suppliers. Ultimately, the EAP Advisory Board

recommended that the Commission approve the application of the discount to the entire bill of all program participants, regardless of whether the EAP participant purchased electricity from the utility or from a competitive supplier.

2. To accomplish this recommendation, the EAP Advisory Board recommended that for customers enrolled in EAP, and obtaining electricity from a competitive supplier, so long as the competitive supplier was using consolidated billing from the utility, the discount would be applied to all charges, including those for electricity. Moreover, the EAP Advisory Board recommended that to avoid the complexity associated with basing discounts on supplier rates, the discount for competitive supply customers would be based upon the utility's default energy service rate as a proxy. The discount would still only be applicable to each customer's first 750 kWh of usage and all usage over 750 kWh would not be discounted.

3. Finally, the EAP Advisory Board noted that implementing the recommendation would require changes to utility billing and customer information systems. Therefore, the EAP Advisory Board recommended that the Commission approve the changes based upon the cost estimates provided by the utilities, subject to the review of those costs upon completion. The Commission approved the EAP Advisory Board's recommendation in Order No. 26,132 (May 4, 2018) and the utilities were to implement the changes by October 1, 2018.

4. This joint submission of Eversource and Liberty includes the information required for the Commission to approve the costs of the changes required by the EAP Advisory Board's recommendation and Order No. 26,132. Described in the attached testimony of Linda Enderwick on behalf of Eversource, and Nicole Harris on behalf of Liberty, the utilities implemented the changes necessary to provide the EAP discount to customers using competitive

suppliers on October 1, 2018 as ordered. As noted by the EAP Advisory Board in its recommendation:

The billing system changes associated with the Advisory Board's recommendation are costs that the utilities would not incur but for the EAP. The Board recognizes that it is appropriate for the utilities to recover costs associated with the billing system changes which the Commission determines to be reasonable and prudent.

April 5, 2018 Recommendation of the EAP Advisory Board in Docket No DE 18-057 at 4. Consequently, the Eversource and Liberty hereby request that the Commission review and approve for recovery the costs of those changes consistent with the EAP Advisory Board's recommendation.


WHEREFORE, Eversource and Liberty respectfully request that the Commission:

- A. Find that the costs of the changes incurred by Eversource and Liberty to implement the EAP Advisory Board's recommendation and Order No. 26,132 were prudently incurred and reasonable in amount;
- B. Order that the identified costs be recovered by Eversource and Liberty; and
- C. Order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire d/b/a Eversource Energy
By Its Attorney

Dated: May 16, 2019


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Respectfully submitted,

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