



April 26, 2019

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

NHPUC 26APR'19PM2:20

Re: Docket No. DE 19-057
Public Service Company of New Hampshire d/b/a Eversource Energy
Notice of Intent to File Rate Schedules – Temporary Rates

Dear Director Howland:

Enclosed for filing with the New Hampshire Public Utilities Commission ("Commission"), please find an original and six copies of Public Service Company of New Hampshire d/b/a Eversource Energy's ("PSNH" or the "Company") Petition for Temporary Rates (the "Temporary Rate Petition") in the above-captioned proceeding. Pursuant to RSA 378:27, PSNH is seeking implementation of temporary rates effective July 1, 2019. This Temporary Rate Petition is accompanied by a Notice of Intent to File Rate Schedules for the Company's permanent rate request, on or about May 28, 2019. That filing will include new rate schedules, testimony and exhibits in support of an adjustment in permanent distribution rates.

Enclosed with this submission is the pre-filed written testimony and attachments of William J. Quinlan, Eric H. Chung, Troy M. Dixon, and Edward M. Davis, supporting the temporary rate request and explaining the revenue allocation. In further support of this Temporary Rate Petition, PSNH provides the following. In Order No. 26,177, issued on September 17, 2018, the Commission directed PSNH to:

[A]ddress the rate effects of the tax reductions by March 31, 2019, and request a rate for effect July 1, 2019, that is designed to provide customers with the full benefit of the tax reductions when Eversource files its certification of 2018 Exogenous Events, if, by that time, Eversource has not already done so in a rate case filing.¹

Later, in November 2018, the Company petitioned the Commission to continue its Reliability Enhancement Program ("REP") for 2019 and to reconcile certain costs and revenues incurred in 2018. Prior to this filing, the Company met with Commission Staff to discuss both the Company's proposal for the REP and its proposal to delay the need for a base-rate proceeding by deferring

¹ Order No. 26,177 (Sept. 27, 2018) at 1.

effective date for temporary rates thereby enabling the Commission's approval of temporary rates for effect July 1, 2019. Therefore, there is no legal impediment to the setting of temporary rates pending the filing of a permanent rate petition, as long as that permanent rate petition is filed on or before the effective date of temporary rates.

As discussed in the joint testimony of Company Witnesses Eric H. Chung and Troy M. Dixon, the reports on file with the Commission show that PSNH is earning substantially less than the return on equity approved by the Commission a decade ago in Docket No. DE 09-035.⁵ Review of permanent rate issues is not required for the investigation of temporary rates; therefore, the fact that the permanent case will follow by 30 days has no negative impact on the Commission's temporary rate-case investigation.

It is in the public interest to allow the temporary rate filing to precede the permanent rate filing by 30 days. The 30-day delay in the permanent rate filing will allow the Company to assemble complete, accurate and reviewable cost information for the permanent rate filing based on a test year ending December 31, 2018, which will facilitate the Commission's in-depth review. At the same time, the proposed temporary rates will help to address the Company's test-year operating deficiency. Finally, a temporary rate effective date of July 1, 2019 is consistent with and implements the Commission's "Order Regarding Rate Effects from Tax Reform," Order No. 26,177 dated September 27, 2018, requiring that TCJA benefits must be provided by PSNH to customers no later than July 1, 2019.

The Company appreciates the Commission's attention to this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Matthew J. Fossum", written over a horizontal line.

Matthew J. Fossum
Senior Counsel

cc: DE 19-057 Service List

⁵ *Pub. Serv. Co. of N.H. v. State*, 102 N.H. 66, 69-70 (1959) (it is appropriate to use that last found return on equity or overall rate of return when setting temporary rates).

TABLE OF CONTENTS

Transmittal Documents

1. Temporary Rates Cover Letter
2. Table of Contents
3. Petition for Approval of Temporary Rates
4. Motion to Waive Customer Notice Requirements

Case Overview

Testimony of William J. Quinlan

Revenue Requirement

Testimony of Eric H. Chung and Troy M. Dixon

- Attachment EHC/TMD-2 (Temp) [Cost of Service]
- Attachment EHC/TMD-3 (Temp) [Support for Adjustments]
- Attachment EHC/TMD-4 [Reference Documents]

Presentation of Rate Tariffs

Testimony of Edward A. Davis

- Attachment EAD-1 (Temp) [Unmarked Copies of Proposed Tariff Pages]
- Attachment EAD-2 (Temp) [Marked Copies of Proposed Tariff Pages]
- Attachment EAD-3 (Temp) [Summary of Current and Proposed Revenues and Rates]
- Attachment EAD-4 (Temp) [Report of Proposed Rate Changes]
- Attachment EAD-5 (Temp) [Customer Bill Comparisons]
- Attachment EAD-6 (Temp) [Detailed Revenue Calculations]
- Attachment EAD-7 (Temp) [Distribution Revenue Normalizing Adjustments]