

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

ELECTRIC ASSISTANCE PROGRAM FUND

Docket No. DE 14-078

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY'S MOTION FOR WAIVER**

Pursuant to N.H. Code Admin. Rule Puc 201.05 and 203.05, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or "the Company") hereby moves for a waiver of certain requirements of Order No. 25,901, issued on May 13, 2016 in Docket No. DE 14-078. In support of this Motion, Eversource states as follows:

1. On April 7, 2016 the Electric Assistance Program ("EAP") Advisory Board submitted a recommendation in this docket concerning changes to the various discount levels offered through the EAP. On April 28, 2016, the New Hampshire Electric Cooperative, Inc. ("NHEC") filed a letter in response to the recommendation requesting permission to make the changes to the discount levels on a bills-rendered basis rather than a service-rendered basis. Pursuant to Puc 1203.05, there is a presumption that rates should be changed on a service-rendered basis unless a utility receives permission from the Commission to implement the change in another manner. According to NHEC's letter, it believed implementation on a bills-rendered basis was appropriate for it because: (1) it is not rate-regulated by the Commission and is not subject to the presumption in Puc 1203.05; and (2) it historically had implemented rate changes on a bill-rendered basis, and, although it would be moving to service-rendered changes in the future, it would not be able to do so in advance of the July 1, 2016 proposed implementation date of the EAP changes.

2. On May 13, 2016, the Commission issued Order No. 25,901, which, among other things, approved the EAP rate changes contained in the recommendation. In addition, and in recognition of the issues raised by NHEC, that Order stated “For consistency among program participants the Commission directs that all utilities implement these changes on a bills rendered basis, and grants a waiver of Puc 1203.05 for that purpose to the other participating utilities.” Order No. 25,901 at 4-5. No parties other than NHEC had sought to make the change from service-rendered billing, and it appears that there was no opportunity to discuss or debate the merits of requiring all utilities to implement bills-rendered changes prior to the issuance of Order No. 25,901. Eversource hereby requests a waiver of the waiver granted in Order No. 25,901 relative to service-rendered billing.

3. In light of the presumption that all rate changes should occur on a service-rendered basis, changes in the EAP discounts in Eversource’s billing system are programmed to be implemented in that way. In the time following the issuance of Order No. 25,901, Eversource has examined alternatives for reprogramming its billing system to implement the EAP change on a bills-rendered basis on July 1, while at the same time assuring that other rate changes proposed for effect on July 1 will be implemented on a service-rendered basis. Eversource has determined that the substantial programming effort to accommodate the change to a bills-rendered implementation in this instance could take several months, and cannot be accomplished prior to July 1. Moreover, any changes to Eversource’s billing system would appear to be necessary only on a temporary basis in light of NHEC’s statements that it is working to transition to service-rendered billing in the future. Because Eversource is not able to make the change from service-rendered billing to accommodate the July 1 implementation date, and because it would likely be required to undo any billing system changes in the near future, Eversource requests a waiver of


the waiver granted in Order No. 25,901 such that Eversource would be permitted to implement the EAP changes on July 1 on a service-rendered basis. Eversource acknowledges that using service-rendered billing would mean that the administration of the EAP would not be consistent among the utilities for a short time. However, in light of Eversource's inability to implement a bills-rendered change until after July 1, there will be a degree of inconsistency in any event, and allowing Eversource the ability to implement the change on a service-rendered basis will result in a lesser degree of inconsistency than requiring a bills-rendered change at a future date.

WHEREFORE, Eversource's respectfully requests that the Commission:

- A. Grant a waiver of the waiver set out in Order No. 25,901; and
- B. Grant such further relief as is just and equitable.

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


Dated: June 13, 2016

By: 
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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

June 13, 2016
Date


Matthew J. Fossum