



DE 15-251

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NHPUC 7AUG15PM3:57

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

ORIGINAL
N.H.P.U.C. Case No. <i>DE 15-251</i>
Exhibit No. <i>#4</i>
Witness <i>Panel #1</i>
DO NOT REMOVE FROM FILE

RE: DE 15-251 - Complaint of Robert Fisher
Eversource Exhibit Submission

Dear Director Howland:

On July 20, 2015 the Commission issued an order that, among other things, scheduled a hearing for August 10, 2015 in the above-referenced complaint. As part of that order, the Commission required that any exhibits intended to be used at the hearing be submitted on or by August 7, 2015. Consistent with the requirements of the order, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") herein submits the exhibits it would intend to introduce.

As a preliminary matter, Eversource notes that in its July 20, 2015 order, the Commission required that the parties submit written statements of potential witnesses, including a summary of the facts and the witnesses' positions, and permitted the parties to submit summaries of the legal issues in this matter. Eversource submitted such a filing on July 24, 2015 and Mr. Fisher did so on July 31, 2015. Upon review of the parties' filings, it is apparent that there is no disagreement on the material facts underlying this matter. The statements of Mr. Fisher, and Eversource's witness, Janice Johnson, are consistent on the facts and circumstances relating to this case. Furthermore, in various locations throughout Mr. Fisher's submission (for example, Attachment 5 pages 6 and 13) he notes that this matter is limited to the appropriate interpretation of the Commission's regulations, an argument Eversource does not dispute.

In that there is no dispute on the material facts, and that the matter relates only to the legal issue of the appropriate interpretation of the Commission's regulations, it appears that there is little, if any, reason for the testimony of witnesses or submission of factual evidence at the August 10, 2015 hearing. Given the scope of the matter, the Commission may reasonably require that the hearing consist solely of arguments relating to the interpretation of the relevant regulations, rather than include unnecessary witness testimony or factual exhibits.

Despite the above, should the Commission conclude that there is cause to review documentary evidence and to accept the testimony of witnesses, Eversource provides the below described documents as exhibits with this submission:

Eversource Exhibit 1 – Pages 1 & 2 consist of screen shots from Eversource’s small customer billing system, C2, showing the billing and payment history of Mr. Fisher’s account. Pages 3 & 4 consist of screen shots from Eversource’s credit system, CACS, showing the dates of the disconnect notices sent to Mr. Fisher and the amounts covered in those notices.

Eversource Exhibit 2 – A generic template for Eversource’s standard notice of disconnection for non-payment. Eversource’s systems do not retain copies of the notices as issued – the notices are automatically generated and the relevant portions are populated by the system.

Eversource Exhibit 3 – A copy of the initial deposit request of \$680 sent to Mr. Fisher in March, 2015.

Eversource Exhibit 4 – A copy of the April, 2015 notice of disconnect for failure to pay the \$380 deposit that was sent to Mr. Fisher.

Eversource Exhibit 5 – A copy of Eversource’s policy and procedures, effective as of May 23, 2012, relating to deposits and acceptance of the guaranty of a customer on behalf of another and noting, at page 3, Section IV.1. “Acceptable credit history is not having any disconnect notices in the last 12 months.”

Thank you for your assistance with this matter. Please do not hesitate to contact me with any questions.

Very truly yours,



Matthew J. Fossum
Senior Counsel

Enclosures
CC: Service List