

March 12, 2018

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



RE: Docket No. DE 16-308
New Hampshire Electric Cooperative & Public Service Company of New Hampshire
Joint Petition to Alter Franchise Areas in Nottingham, New Hampshire

Compliance Proposal of Eversource

Dear Director Howland:

In the above-captioned docket, on March 16, 2016 Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") and the New Hampshire Electric Cooperative ("NHEC") jointly petitioned for a revision to their respective utility franchise boundaries to accommodate the request of Mr. Joseph Falzone of Harbor Street Limited Partnership to have NHEC provide electric service to all of the lots in Phase I of the Maple Ridge residential subdivision located between Friar Tuck Lane and Oak Ridge Road in Nottingham. In August 2016, the Staff filed a recommendation in the docket recommending that the franchise boundaries be adjusted as proposed, but also that further approvals be sought before any service might be provided to the then-undeveloped Phase II and Phase III of the Maple Ridge development.

On September 8, 2016, the Commission issued Order No. 25,941 approving the adjustment to allow NHEC to serve Phase I. In that Order, the Commission adopted the recommendation of the Staff and directed "Eversource to submit a proposal regarding service to customers in Phase II and/or Phase III of the subdivision prior to its commencement of any work related to service to customers located within either of those development phases." Order No. 25,941 at 4. Recently, Eversource has been informed that the remaining phases of the Maple Ridge subdivision are ready for development and the developer is seeking to have electric service installed as soon as possible. Consistent with the requirement in Order No. 25,941, Eversource provides the enclosed proposal for service to Phase II and Phase III.

As shown in the maps included with the initial petition in this docket, Phase I of the Maple Ridge development consists of residential lots extending from Oak Ridge Road in the south to a wetland buffer area approximately one-third of the way along Maple Ridge Road. Phases II and III extend northerly from that wetlands buffer to an intersection with Friar Tuck Lane in the north. Eversource serves existing homes on Friar Tuck Lane. Eversource is

proposing to extend its facilities from Friar Tuck Lane southerly down Maple Ridge Road to the point of the wetlands buffer separating Phase I and Phase II. The proposed extension is shown in the attached map, included as Attachment 1. The entirety of Phase II and Phase III are located within Eversource's existing franchise area and no franchise line adjustment is necessary. Further, there are no special construction issues or concerns that have been identified with this extension, and it would be undertaken in a manner consistent with Eversource's practice for such extensions along public rights-of-way throughout its service territory.

As Eversource understands the issues of the Staff at the time of the prior adjustment, the Staff desired that additional proposals be submitted out of concern that homes along the Maple Ridge subdivision would be served by different utilities, which could lead to customer confusion. For the following reasons, Eversource believes such concerns are unfounded in this case and that the development should be permitted to proceed as proposed by Eversource. Initially, it is common throughout the state to have adjacent or nearby homes served by different utilities and Eversource is not aware of any issues of customer confusion that would require differing treatment in this case. Further, if the franchise line was redrawn to permit NHEC to serve all of Maple Ridge Road, there would still be adjacent properties served by different companies. Eversource would continue to serve the homes along Friar Tuck Lane adjacent to those on Maple Ridge Road. Separating the utility service areas by using a naturally occurring buffer is the most reasonable course in this case.

Additionally, and as noted above, there is an existing wetlands buffer between Phase I and Phase II which provides a natural and reasonable point of demarcation between the homes in each of those phases. Also relevant is that by having Eversource extend its facilities from the north, it avoids either utility having to place facilities within the wetlands buffer area. Eversource understands that all of Phase II and Phase III are ready for construction, and the developer is ready to begin work as soon as power is provided through both phases. Therefore there is no issue with Eversource constructing its facilities through Phase III to reach Phase II, but delay in constructing Eversource's facilities would delay further development in both phases. Permitting Eversource to proceed as proposed is reasonable and appropriate.

Accordingly, Eversource proposes to construct facilities to serve the new homes to be built along Maple Ridge Road consistent with the existing franchise boundary lines and the expectations of the developer. Thank you for your cooperation. Please do not hesitate to contact me with any questions.

Very truly yours,



Matthew J. Fossum
Senior Counsel

Enclosure

Cc: Service List
Linda Farrar, Eversource
Justin Hatch, Eversource
Dean Benton, NHEC