


**STATE OF NEW HAMPSHIRE****Inter-Department Communication****DATE:****AT (OFFICE):** NHPUC

**FROM:** Kurt Demmer – Utility Analyst, Electric Division

**SUBJECT:** DE 17-127  
Public Service Company of New Hampshire d/b/a Eversource Energy  
Request for a Waiver of PUC 305.03

**TO:** Chair Honingberg and Commissioners Bailey and Giaimo  
Executive Director Howland



On August 15, 2017, Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) filed a petition pursuant to the New Hampshire Code of Administrative Rules Puc 201.05, requesting an additional 12 month extension to the waiver granted under petition 13-215. This waiver relates to the test schedules for watt-hour and demand meters under Puc 305.03.

In support of its waiver, Eversource cites Puc 201.5 which states that the Commission shall waive the provisions of any of its rules, except where precluded by statute, upon request by an interested party, or on its own motion, if the Commission finds that the waiver serves the public interest and the waiver will not disrupt the orderly and efficient resolution of matters before the Commission.

In determining the public interest, the Commission shall waive a rule if compliance with the rule would be onerous or inapplicable given the circumstances of the affected person or the purpose of the rule would be satisfied by an alternative method proposed. Eversource has stated that the meter testing program is being replaced by a program that is more suited for testing solid state Automatic Meter Reading (AMR) meters. The proposed testing program will not be in place in order to test meters starting October 2017. Eversource has also stated that since the solid state meters have been recently installed, additional testing is not needed due to the lower failure rate compared to the electromechanical meters that were replaced.

Staff sent data requests to Eversource on August 24<sup>th</sup>, 2017 and has received the first set of responses.

Staff does not support this request and believes that Eversource has not met the criteria that this waiver will serve the public's interest for the following reasons:

- (a) Eversource has replaced over 500,000 customer meters in the past 4 years as part of the Company's transition from manual meter reading to AMR. The AMR deployment plan should have included the Puc required testing program once the waiver expired. The meter testing program proposed by Eversource is based on an adoption of ANSI C12.1-2014, however Puc 305.03(g) rule cites "A utility shall notify the commission in writing before changing any meter testing schedule which the utility has adopted pursuant to this section." In absence of an approved proposed meter testing program which was still in draft form as of 9/1/2017, does not preclude the continuation of the prior approved program which can commence in October 2017. Since the deployment of the AMR installations has exceeded the original projected completion date of 2<sup>nd</sup> quarter 2016, additional time has elapsed to allow Eversource to notify the Commission of the new testing program for review prior to the project completion of this year. There should be no delay in implementing the previously approved meter testing program that was performed by Eversource in previous years.
- (b) Eversource's position that electronic digital meter are less prone to the kinds of errors found in electromechanical meters is misleading. Although there is a higher standard of calibration achieved using the digital meter, the digital meter is not immune to equipment failure or inaccurate reads, especially if the unit has been exposed to high voltage transients or other conditions that may have occurred during shipping or storage. Eversource states that the meters went through a calibration and testing process by the manufacturer upon installation, and they were sample tested at the time of installation. This does not protect the customer from receiving a compromised meter as the manufacturer tests prior to the meter being shipped. A meter test after the meter has been installed and in service is a closer representation of what the customer's service meter is providing for accuracy.
- (c) Finally, as a result of the AMR installation project, Eversource has reduced labor by 49 full time equivalents (FTE's). In addition to that reduction, Eversource was already granted a waiver in 2013 to annually test a selected meter population. In both cases, considerable operational expense (OPEX) savings were anticipated to be realized by the Company. The Company should have utilized some of the anticipated savings to ensure that a meter testing program was in place for October 2017 as originally committed to in DE 13-125.

If you have any questions or concerns related to Staff's recommendation, please let me know.

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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**FILING INSTRUCTIONS:**

**a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429

**b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**

**c) Serve a written copy on each person on the service list not able to receive electronic mail.**