

**THE STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

AGREED UPON MODIFIED REQUEST FOR WAIVER OF PUC 305.03

Docket No. DE 17-127

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “Company”), in agreement with the Staff of the Commission and the Office of Consumer Advocate (“OCA”) (collectively “the Parties”), hereby submits this modified request, pursuant to New Hampshire Code of Administrative Rules Puc 201.05, that the Commission waive certain requirements of Puc 305.03, relative to the testing schedules for watt-hour meters and demand devices. In support of this filing, the Parties say the following:

1. On August 18, 2017, Eversource submitted a request for a waiver of certain provisions of Puc 305.03 which sets out certain sampling and scheduling requirements for the testing of watt-hour meters and demand devices. On August 30, 2017, the OCA submitted its notice of intent to participate in the docket and the Parties engaged in informal discovery relative to Eversource’s request. On September 25, 2017, the Staff filed a recommendation in the docket recommending against the waiver for a variety of reasons. Thereafter, the Parties held informal discussions leading to the agreed upon modified request described below. The Parties agree that the below request satisfies the criteria for a waiver under Puc 201.05 and recommend that the Commission adopt and approve this modified request.

2. A significant concern raised relative to Eversource’s initial proposal was that following the transition to Eversource’s new Automated Meter Reading (“AMR”) meters, the number of meters Eversource proposed to be tested is significantly lower than previous levels,

but such a reduction was not justified by testing data and information about the performance of the AMR meters installed since 2014. The Parties agree that the number of meters initially proposed for testing by Eversource was in line with the requirements of the testing standards contained in ANSI/ASQ Z1.9-2003 and ANSI C20.1-2008 adopted by the American National Standards Institute (“ANSI”) following the promulgation of the Commission’s current regulations in Puc 305.03. However, the Parties also agree that while Eversource had not intended to eliminate or otherwise avoid its obligations to test meters, during the period of installation of the AMR meters, those meters had not been included in a formal in-service testing program, and now should be incorporated into a formal in-service testing program that is more inclusive than the standard in ANSI/ASQ Z1.9-2003. Accordingly, the Parties have agreed that in lieu of moving to the new standard at present, the criteria included in paragraph 3 of this modified request shall form the basis for a transitional period, after which Eversource may renew its request to implement the more recent testing standard, as further described below.

3. The following shall form the basis for Eversource’s testing of meters for the remainder of 2017 and calendar year 2018 to provide a transition to the potential implementation of the new standard in 2019:

- a. Eversource will abide by the proposed selection plan for selecting a population of meters to be sample tested as described in Attachment A to this filing.
- b. Beginning January 1, 2019, Eversource will transition from a testing period occurring in an October through September time frame to one based on a calendar year.
- c. To accommodate the shift to a calendar year based program, 2018 will be a transition year in which the following testing quantities will be utilized:

- The size of the sample will be double of those proposed by ANSI/ASQ Z1.9-2003 levels for each of the sampling lots defined in Eversource's proposal.
- Testing for the meters included within the new "double" amount will be completed by October 1, 2018.
- In addition to the doubled amount described above, Eversource shall also test a prorated amount equal to 1.25x (3 months) the transitional amount which will be selected and required to be completed prior to December 31, 2018. The total number of meters to be tested, and the relevant schedules for completion of testing, are set out in the below table:

Lot #	Sample Size Code	ANSI Z1.9 Sample Size ¹	Double ANSI Z1.9 Sample Size	Prorated to 12/31/2018 Sample Size	Lot Description
1	P	200	400	500	Itron C(N)1S (D) (DR) (R) (T)
2	N	150	300	375	Itron Bridge C(N)2SO (D)
3	M	100	200	250	Itron Polyphase Bridge CP2SO
4	M	100	200	250	GE/Aclara I-210 (+) (C) (CN) (N)
5	G	15	30	38	All remaining solid state meters (GE/Aclara kV (2) (C) (+); Itron SS1S1D; L&G S4, Elster A1D)
6	G	15	30	38	All remaining electromechanical meters

- Eversource may test the meters pursuant to any schedule it deems appropriate to complete the testing by the dates specified above.

¹ ANSI Z1.9 Sample Size is based on Eversource's "in service" population of Lot# on an annual (12 month) basis.

d. To the extent reasonably practicable, meters removed from service during the testing period for reasons other than vandalism or maintenance should be included in the cohort of meters to be tested. However, at least 50% of each sample lot/code/size (cohort) listed above must be drawn from meters remaining in service during the testing period.

e. Following completion of the testing of the “doubled” amount by October 1, 2018, Eversource will present the testing results from those meters to Staff and the OCA. Limits to determine acceptability under those tests will be: 1) a failure rate less than 1 percent; and 2) a passing condition within the ANSI/ASQ Z1.9-2003 testing criteria based on an AQL equal to 1.0 percent utilizing a General Inspection Level II. Eversource will report such results separately for the meters removed from service during the testing period for reasons other than sample testing and the meters removed from service specifically for sample testing.

f. Should the testing results for the meters within the “doubled” amount fall within the limits specified in the preceding paragraph, Eversource may, at the time of its report in October 2018, renew its request to implement the ANSI/ASQ Z1.9-2003 testing requirements beginning on January 1, 2019.

4. In addition to the above schedule and requirements for the transition of the meter testing, the Parties also agree to two additional changes that Eversource may implement in 2017 to its periodic test program and which constitute waivers from the existing rules. First, meters currently assigned to the 12-year periodic program (Self-contained poly-phase meters under Puc 305.03(c)(2)) will be included in Eversource’s sampling program in a manner consistent with meters under Puc 305.03(c)(1). Second, the meters currently assigned to the 4-year periodic

program (polyphase transformer-rated meters under Puc 305.03(c)(4)) will be moved to the 8-year program. These changes will result in all Eversource meters (other than the typically non-retail meters maintained under ISO requirements) under Puc 305.03(c)(3) and Puc 305.03(c)(4) being included in the 8-year program.

5. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

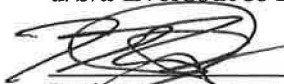
6. Based upon the discussions of the Parties and the information exchanged, the Parties believe that this modified request meets the requirements for a waiver pursuant to the Commission's rules. In recognition of differences in the design and function of the AMR meters, as well as the changes in industry standards, and considering Eversource's field experience to date, the Parties agree that Eversource should have a reasonable opportunity to demonstrate that implementation of the new standard and procedures is justified. In such a case, compliance with the existing rule is inapplicable. Moreover, permitting Eversource to obtain the above-described limited waiver for the purpose of demonstrating that a more expansive waiver is proper, ensures that the purposes of the rule – that Eversource will appropriately inspect and test its installed meters on a regular basis in line with industry standards to confirm that they are working properly, and to repair or remove from service those meters not working properly – will continue to be satisfied.

WHEREFORE, the Parties respectfully request that the Commission grant a waiver of Puc 305.03 as described above, and order such further relief as may be just and equitable.

Respectfully submitted,

Dated: October 27, 2017

**Public Service Company of New Hampshire
d/b/a Eversource Energy**



By its Attorney, Matthew J. Fossum

Dated: October 27, 2017

**Staff of the New Hampshire Public Utilities
Commission**



By its Attorney, Suzanne Amidon

Dated: October __, 2017

Office of the Consumer Advocate



By is Attorney, Brian D. Buckley

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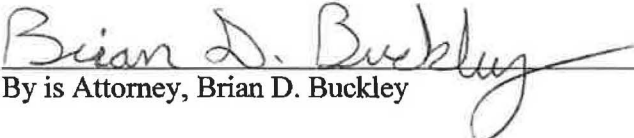
Dated: October __, 2017

**Staff of the New Hampshire Public Utilities
Commission**

By its Attorney, Suzanne Amidon

Dated: October 27, 2017

Office of the Consumer Advocate


By its Attorney, Brian D. Buckley