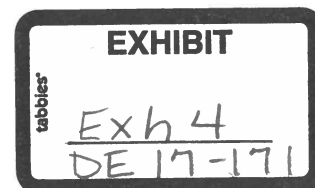


Public Service of New Hampshire d/b/a Eversource Energy
Docket No. DE 17-171



Date Request Received: 01/17/2018

Date of Response: 01/31/2018

Request No. RR 1-001

Page 1 of 2

Request from: New Hampshire Public Utilities Commission Staff

Witness: Kenneth J. Millerd

Request:

Can Eversource identify and segregate payments made by mailed check, rather than other payment methods, for separate treatment until a new payment vendor is in place later in 2018? Please explain what can be done with customers making those payments, in particular with respect to the imposition of late payment charges.

Response:

Because customers may change their payment methods from month-to-month, changes directed to customers paying by mail may affect different customers in a given month. Nonetheless, Eversource provides the following:

After a bill is rendered and a payment is received, Eversource could identify and segregate payments that have been made by check for separate treatment until a new payment vendor is in place. Doing so would require manually running a query of the billing system regularly (likely daily) to identify any payments made by check, and that were processed at a time late enough that the billing system will have generated a late payment charge. Given the timing of bills and payments, customers that are assessed late payment charges, stemming from potential vendor-processing delays or for any other reason, would see this charge appear on their bills. These impacted customers could subsequently be credited for the late payment charge; this credit would appear on the following month's bill.

Given that late payment charges do not result only from mail processing delays, to determine which charges might be appropriate to reverse, a manual analysis would be subsequently required to determine the appropriateness of reversing the late payment charge as being related to a payment processing delay, rather than for some other reason. Alternatively, there would need to be a requirement to assume that every customer paying by check should have any and all late payment charges waived, regardless of the mail or processing time. Although this option would eliminate the manual review to determine the cause of the late payment charge, it would still require the manual queries of the billing system on a regular basis and separate special programming to reverse the late payment charges.

The table below provides a summary of late payment charge activity from 2015 through 2017. As shown, the volume of late payment charges has not materially changed over the time period. Although not a material change, Eversource is committed to providing accurate bills to its customers and addressing any customer billing issues in a timely manner. The recent tariff change effective December 1, 2017, which added five days to when the late payment charge is assessed, as well as the other customer service improvements initiated to respond to our customers' recent dissatisfaction, will

improve the situation until a new payment processing vendor, which has recently been hired, can complete implementation in the second quarter 2018. Therefore, the significant manual measures required to segregate payments for special late payment charge treatment are not warranted, particularly in view of the impending shift to a new and more local payment processing vendor.

YEAR	TYPE	# LPCs Assessed (All Cust)	# LPCs Assessed (Mail Option)	# Customers Assessed LPCs (Mail Option)
2015	Residential	859,392	256,133	72,024
	Commercial	125,142	83,540	25,429
2016	Residential	856,536	232,985	64,779
	Commercial	111,861	73,284	22,942
2017	Residential	850,488	225,595	68,408
	Commercial	125,071	87,860	28,082