

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

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY
METER TEST REPORT AND RENEWED REQUEST FOR WAIVER OF PUC 305.03**

Docket No. DE 18-XXX

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “Company”) hereby requests, pursuant to New Hampshire Code of Administrative Rules Puc 201.05, and the Commission’s December 19, 2017 secretarial letter in Docket No. DE 17-127, 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, Eversource says the following:

1. Puc 305.03 sets out certain scheduling requirements for the testing of watt-hour meters and demand devices. Under Puc 305.03(c)(1)b.1. Eversource is required, on an annual basis, to select a sample test group of meters for testing and to repair, recalibrate or retire the meters it tests as may be necessary. In addition, pursuant to Puc 305.03(c)(1)b.2. and Puc 305.03(d), Eversource is to select additional meters, beyond those in the sample test group, for testing, and is to repair, recalibrate or retire those meters as may be necessary.

2. Following the transition of its fleet electromechanical meters to new digital Automated Meter Reading (“AMR”) meters, Eversource sought a waiver from the Commission relative to the testing requirements contained in Puc 305.03. *See generally* Docket No. DE 17-127.¹ As noted in the “Agreed Upon Modified Request for Waiver of Puc 305.03” (“Agreed Waiver”) submitted by Eversource on October 27, 2017 in Docket No. DE 17-127, and which was approved by the

¹ The waiver initially sought by Eversource in Docket No. DE 17-127 was, in part, a continuation of a similar waiver that had been granted during Eversource’s transition to new meters. *See generally* Docket No. DE 13-215.

Commission by Secretarial Letter on December 19, 2017, the Commission Staff recommended against the initial waiver request. In particular, the Staff's recommendation noted that that number of meters Eversource proposed to be tested was significantly lower than previous levels, but such a reduction had not been justified by testing data and information about the performance of the AMR meters installed since 2014.

3. Following on that recommendation, Eversource engaged in discussions with the Staff and OCA that resulted in the Agreed Waiver. Pursuant to the terms of the Agreed Waiver, Eversource was to abide by certain testing requirements for 2017, while 2018 would serve as a transition year for meter testing. During the transition year, Eversource would follow an agreed upon sampling and testing protocol and would submit a report of that sampling and testing to the Commission. A copy of the required report is attached to this request as Attachment A. If, based upon the testing and reporting, the meters performed within the limits specified in the Agreed Waiver (paragraph 3.e.), Eversource was permitted, at the time of its report in October 2018, to renew its request to implement the testing requirements it had initially sought to employ pursuant to its initial waiver request in Docket No. DE 17-127. More specifically, Eversource was permitted to request a waiver of Puc 305.03 that would allow Eversource to implement the ANSI/ASQ Z1.9-2003 testing requirements beginning on January 1, 2019. Through this submission, Eversource hereby requests that the Commission grant the waiver contemplated in the Agreed Waiver and permit Eversource to implement the ANSI/ASQ Z1.9-2003 standard for meter testing.

4. 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.

5. The meters installed by Eversource are digital, “solid state,” meters which are less inclined to the kinds of errors found in electromechanical meters (e.g., friction, wear of mechanical components, magnetic circuit problems, etc.), and the meters were subject to calibration and testing at the time of installation. Further, based upon the discussions of the Parties and the information exchanged in Docket No. DE 17-127, Eversource, the Commission Staff and the OCA concluded that the Agreed Waiver, including the provision to renew the wider waiver request, was appropriate under the Commission’s rules. Those conclusions were based upon a recognition of the differences in the design and function of the new meters, as well as the changes in industry standards, and considering Eversource’s field experience to date. Those conclusions have now been bolstered by the successful testing of meters in 2018 pursuant to the Agreed Waiver. Having had the opportunity to demonstrate that implementation of a new standard and procedures is justified through testing and reporting in 2017 and 2018, compliance with the existing rule is inapplicable and waiver is appropriate.

6. Moreover, the limited waiver in effect pursuant to the Agreed Waiver has allowed Eversource to demonstrate that under the more expansive waiver Eversource will continue to meet the purposes of the rule, i.e., 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. Thus, the purpose of the rule will continue to be satisfied and granting the more extensive waiver is appropriate.

7. Lastly, in that this request for a waiver does not pertain to any matters currently pending before the Commission, and that this waiver is being requested pursuant to specific authorization previously granted by the Commission, Eversource avers that granting the waiver will not disrupt the

orderly and efficient resolution of matters before the Commission. Accordingly, in light of the Agreed Waiver, Eversource's experiences of testing and sampling under the Agreed Waiver, and the evidence that testing under the Agreed Waiver supports the broader waiver, Eversource requests that the Commission waive the provisions of Puc 305.03 and allow Eversource to implement the following changes to the sample testing protocol:


- Use sampling criteria methodology and volumes as outlined within ANSI/ASQ Z1.9-2003.
- Permit Eversource to adjust the testing schedule to an annual basis (January to December) starting in 2019.
- Permit Eversource to include all self-contained single and polyphase meters within the sample testing program.
- Permit Eversource to include meters removed through the course of normal business as part of the sample testing lots outlined within ANSI/ASQ Z1.9-2003.

WHEREFORE, Eversource respectfully requests 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,

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

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