

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: November 5, 2018

AT (OFFICE): NHPUC

FROM: Rich Chagnon 
Utility Analyst – Electric Division

SUBJECT: DE 18-162,
Public Service Company of New Hampshire d/b/a Eversource Energy
Meter Test Report and Renewed Request for Waiver of PUC 305.03

TO: Commissioners
Debra Howland, Executive Director

CC: Tom Frantz, Director, Electric Division
Amanda Noonan, Director, Consumer Services and External Affairs
Les Stachow, Assistant Director, Electric Division
Suzanne Amidon, Staff Attorney

Summary

On October 17, 2018, Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) filed its 2018 Meter Test Report (report) and its renewed request for waiver of Puc 305.03. This report and renewed waiver request was based upon a modified request and proposal agreed to between the Company, Staff and the OCA previously approved by the Commission in its December 19, 2017 secretarial letter in Docket No. DE 17-127.

Based upon the positive results of the tests as shown in the 2018 report, Staff recommends that the Commission approve Eversource's renewed request for waiver of Puc 305.03.

Background

On August 15, 2017, in Docket No. DE 17-127, 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 in Docket No. DE 13-215. This waiver relates to the test schedules for wathour and demand meters under Puc 305.03. Eversource has

replaced over 500,000 customer meters since 2013 as part of the Company's transition from manually read meters to automatic meter reading (AMR) meters.

On October 27, 2017, Eversource withdrew its initial request and submitted a modified request and proposal agreed to between the Company, Staff and the OCA.

The modified request and proposal was designed to create transitional criteria for the selection and testing of meters for the remainder of 2017 and calendar year 2018 pending the potential implementation of new standards in 2019. As part of this transition, Eversource would move from a testing period of October through September, to one based on a calendar year in 2019. Eversource, Staff, and the OCA agreed that, if testing results for meters during that period fall within certain limits specified within the modified request, then Eversource may renew its request to implement new ANSI/ASQ Z1.9-2003 testing requirements beginning on January 1, 2019.

Eversource, Staff and the OCA had agreed to two changes that require waiver of the meter testing rules. In particular, self-contained poly-phase meters assigned to a 12-year period program pursuant to Puc 305.03(c)(2) would be included in Eversource's sampling program in a manner consistent with meters under Puc 305.03(c)(1). In addition, poly-phase transformer-rated meters assigned to a 4-year periodic program under Puc 305.03(c)(4) would be moved to an 8-year program.

On December 19, 2017, the Commission issued a secretarial letter approving the limited waiver request pursuant to Puc 201.05, stating that the applicable standards for a waiver were satisfied and that granting a waiver of Puc 305.03 as described in the settlement was consistent with the public interest.

Eversource

On October 17, 2018, Eversource filed its report and its renewed request for waiver of Puc 305.03. As noted in its report, Eversource selected and tested slightly more meters than were required for each sample lot of meters to ensure that the minimum test quantities were met, stating that the ANSI analysis of these sample meter tests indicated that all sample lots were found to be within acceptable tolerance limits.

As a result, Eversource requested to allow implementation of the following changes to the sample meter 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.

Recommendation

Staff has reviewed Eversource's agreed upon modified request for waiver of Puc 305.03 in Docket No. DE 17-127, and the ANSI analysis report that indicates all sample lots were found to be within acceptable tolerance limits. Staff has determined that the requested waivers of the relevant provisions of Puc 305.03 would serve the public interest and would not disrupt the orderly and efficient resolution of matters before the Commission, as required under Puc 201 .05.

Staff recommends that the Commission approve Eversource's renewed request for waiver of Puc 305.03.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

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

Executive.Director@puc.nh.gov
amanda.noonan@puc.nh.gov
donald.kreis@oca.nh.gov
james.brennan@oca.nh.gov
leszek.stachow@puc.nh.gov
matthew.fossum@eversource.com
ocalitigation@oca.nh.gov
richard.chagnon@puc.nh.gov
suzanne.amidon@puc.nh.gov
tom.frantz@puc.nh.gov

Docket #: 18-162-1 Printed: November 05, 2018

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.