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EGGLESTON &  
CRAMER PC

ELIJAH D. EMERSON  
ADMITTED IN VT, NH, MA AND ME  
*eemerson@primmer.com*  
TEL: 603-444-4008  
FAX: 603-444-6040

106 Main Street | P.O. Box 349 | Littleton, NH 03561-0349

August 5, 2019

NHPUC 7 AUG 19 AM 8:36

Debra A. Howland, Executive Director  
Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

Re: DE 19-057, Public Service Company of New Hampshire d/b/a Eversource Energy

Dear Ms. Howland:

On July 31, 2019, Public Service Company of New Hampshire d/b/a Eversource Energy (“PSNH”) filed a letter with the Public Utilities Commission (the “Commission”) giving notice that it will withdraw the two “Clean Innovation Projects” (the “Projects”) and associated testimony from the above-mentioned docket with the intent to propose these Projects in separate dockets. PSNH indicated in this letter that the remaining Grid Transformation Enablement Program (“GTEP”) and associated Distribution Revenue Adjustment Mechanism (“DRAM”) will remain in the rate case.

Clean Energy NH (“CENH”) does not support this proposal.<sup>1</sup> It is concerned that creating additional dockets also creates a less efficient review process that consumes additional time and resources for all involved, especially while the remainder of the GTEP and the entirety of the DRAM remain in the rate case. Issues and relevant information are likely to span all three dockets, and the Commission is likely to have to make decisions on certain issues, like the DRAM, that will be impacted by the details of the Projects. By removing the Projects, it creates an incomplete picture of the GTEP and the DRAM.

Additionally, without the “Projects” remaining in this docket, the GTEP consists of accelerated investments in distribution pole replacements, distribution line reconstruction and reconductoring, and substation renewals – all of which fall squarely in the realm of distribution system maintenance. It is difficult to see any meaningful “grid transformation” or enablement resulting from these investments. CENH is also unconvinced by the testimony presented thus far that the GTEP is not an attempt to begin Grid Modification before important issues, such as utility cost recovery, have been resolved in Docket No. IR 15-296.

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<sup>1</sup> Puc 203.10(a) implies that PSNH must request permission to amend the petition and the Commission shall permit the amendment if it finds conditions (1) and (2) are met. PSNH has not requested permission to amend its petition but has simply notified the Commission that it will be amending the petition.

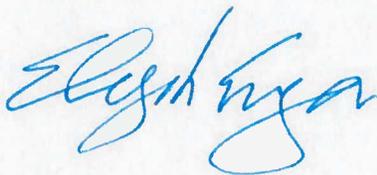
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It is CENH's position that splitting the "Projects," other GTEP elements, and the associated cost recovery mechanism will cause more complication and duplication of effort than any potential gain in expediency in the rate case. The amendment will not "encourage just resolution of the proceeding" and it will "cause undue delay" of the resolution of entirety of the issues presented in this matter.

For these reasons, CENH asks that the Commission deny the proposal to remove the Projects from Docket No. DE 19-057.

Regards,



Elijah D. Emerson

Cc: Service List