

STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire
Energy Service Solicitation for
August 2019 through January 2020

DIRECT TESTIMONY OF
FREDERICK B. WHITE

1 **I. INTRODUCTION**

2 **Q. Please state your name.**

3 A. My name is Frederick B. White.

4 **Q. Mr. White, please provide your business address and title.**

5 A. My business address is 107 Selden St, Berlin, Connecticut. I am a Supervisor in the
6 Electric Supply department of Eversource Energy.

7 **Q. Mr. White, please describe your responsibilities at Eversource Energy.**

8 A. I supervise and provide analytical support required to fulfill the power supply requirement
9 obligations of Public Service of New Hampshire, d/b/a Eversource Energy (“Eversource”
10 or the “Company”), including conducting solicitations for the competitive procurement of
11 power for Energy Service (at times referred to herein as “ES”) and for fulfilling Renewable
12 Portfolio Standards (“RPS”) obligations. I am also responsible for on-going activities
13 associated with independent power producers and purchase power agreements.

14 **II. PURPOSE**

15 **Q. What is the purpose of your testimony?**

16 A. The purpose of my testimony is to support the Company’s request for Commission
17 approval of Eversource’s planned procurements of full requirements power from wholesale
18 energy providers and Energy Service rates for both the Large and Small Customer groups
19 for the period August 1, 2019 through January 31, 2020. Energy Service is provided to
20 retail customers who are not taking service from a competitive supplier and is currently
21 provided to approximately 45% of Eversource’s total distribution load. Load requirements
22 may change from time to time and winning suppliers are responsible for their share of

1 Large or Small Energy Service supply regardless of changes in customer demand for any
2 reason, including daily load fluctuations, increased or decreased usage, demand-side
3 management activities, extreme weather and similar events. Suppliers are required to
4 supply their share of load for the full delivery term of August 2019 through January 2020.
5 My testimony will describe the solicitation process used by Eversource to procure full
6 requirements power, the results of the solicitation and selection of suppliers, and the
7 development of the RPS rate adder.

8 **Q. Please provide a list of attachments to your testimony.**

9	A.	FBW-1	Energy Service RFP for August 1, 2019 through January 31, 2020
10		FBW-2	RFP Results and Selection of Suppliers
11		FBW-3	Proxy Prices
12		FBW-4	RPS Rate Adder
13		FBW-5	Executed Transaction Confirmation – Dynegy - Large
14		FBW-6	Executed Transaction Confirmation – NextEra - Small
15		FBW-7	Executed Transaction Confirmation – Exelon - Small
16		FBW-8	Executed MPSA - Dynegy

17 **III. ENERGY SERVICE SOLICITATION PROCESS**

18 **Q. What is the background leading to Eversource procuring Energy Service from**
19 **competitive wholesale suppliers?**

20 A. On June 10, 2015, and following extensive negotiations, Eversource and numerous other
21 parties filed the 2015 PSNH Restructuring and Rate Stabilization Agreement (the “2015
22 Agreement”), which was approved by the Commission along with a related litigation
23 settlement in Order No. 25,920 (July 1, 2016).

24 Consistent with the 2015 Agreement, on June 29, 2017 Eversource filed a petition and
25 supporting testimony with the Commission seeking approval of a proposal for procuring
26 and providing default Energy Service to customers on a competitive basis, rather than
27 through its previous paradigm of a managed portfolio with owned generation resources.
28 This filing initiated Docket No. DE 17-113, “Petition for Approval of Energy Service
29 Supply Proposal.” Following discussions among the parties to that docket, a Settlement
30 Agreement was reached which described the method of and timing for Eversource’s
31 transition to competitively procured Energy Service following the sale of its thermal
32 generating assets. That Settlement Agreement was approved by Order No. 26,092
33 (December 29, 2017).

1 Consistent with the Settlement Agreement in Docket No. DE 17-113, Eversource
2 conducted its initial solicitation for full requirements ES (not including RPS obligations)
3 for the period April 1 through July 31, 2018. Also consistent with the Settlement
4 Agreement, going forward, subsequent solicitations are to be made for service effective in
5 the August through January, and February through July periods.

6 **Q. Please describe the process Eversource used to procure its Energy Service supply for**
7 **August 1, 2019 through January 31, 2020.**

8 A. Eversource conducted its procurement of Energy Service supply in accordance with
9 applicable law, Commission directives, and the Settlement Agreement approved by the
10 Commission in Order No. 26,092, and consistent with the manner of similar solicitations
11 for other companies throughout New England. On May 2, 2019, Eversource issued a
12 request for proposals (“RFP” – Attachment FBW-1) for power supply services for
13 Eversource’s Energy Service covering both the Large and Small Customer groups. The
14 RFP was issued to over 100 potential suppliers and all members of the New England Power
15 Pool (“NEPOOL”) Markets Committee, and posted on Eversource’s Wholesale Supply
16 (New Hampshire) website. Therefore, the RFP had wide distribution throughout the New
17 England energy supply marketplace.

18 Proposals were to be stated on an “as-delivered” energy basis to Pool Transmission
19 Facilities (“PTF”) within the Eversource metering domain, with prices stated monthly on a
20 fixed \$/MWH basis. Prices could vary by calendar month, but were required to be uniform
21 for the entire calendar month and cover the entire delivery term. The Small Customer
22 group was divided into four tranches and the Large Customer group was one tranche. The
23 prices for each tranche and customer group could be different. In addition, prices could not
24 contain demand components or vary by time-of-use within a calendar month. Each tranche
25 for each customer group was evaluated separately. Offers were due on June 4, 2019,
26 winning suppliers were selected the same day, and transaction confirmations were executed
27 the following day.

28 **III. ENERGY SERVICE SOLICITATION RESULTS**

29 **Q. Did Eversource receive acceptable responses to the RFP and select winning proposals**
30 **for serving Energy Service load?**

31 A. Yes. Eversource received multiple conforming proposals on June 4, 2019. Eversource
32 evaluated the offers and selected winning suppliers based on lowest price by customer

1 group using a forecast of monthly Energy Service load by customer group, compliance with
2 non-price bidding requirements and bidder qualifications, and risk relative to price and
3 ability to serve the load, in accordance with the RFP. On June 5, 2019, Eversource entered
4 into Transaction Confirmations for the period August 1, 2019 through January 31, 2020
5 with the winning suppliers for the Large and Small Customer groups. Together, a
6 Transaction Confirmation and a Master Power Supply Agreement (“MPSA”), provide the
7 terms for the purchase of Energy Service from a supplier, and both have been executed for
8 all the winning suppliers. Copies of executed Transaction Confirmations and the executed
9 MPSA with Dynege Marketing and Trade are included in this filing as Attachments FBW-5
10 thru 8. Executed MPSAs with NextEra and Exelon were previously provided in
11 Eversource’s filing on December 13, 2018 in Docket 18-002.

12 **Q. Please discuss the offers received and the analysis leading to the selection of winning**
13 **suppliers.**

14 A. The offers received and the identification of winning offers are shown in Attachment FBW-
15 2. In addition to ranking by price and the ability to meet credit requirements, Eversource
16 also considered the following regarding each supplier: experience in providing similar
17 services to Eversource; demonstrated understanding of the market rules related to the
18 provision of Energy Service; demonstrated understanding of its obligations under the
19 MPSA; and any past or present events that are known that may adversely affect their ability
20 to provide Energy Service. Eversource has previously experienced successful full
21 requirements power supply transactions with all the suppliers providing offers in response
22 to this RFP, and all have demonstrated good competence throughout the terms of those
23 transactions. No suppliers were downgraded by any prior experiences and all have met the
24 credit requirements outlined by the MPSA and RFP. Eversource concluded that all
25 responding suppliers were qualified to provide Energy Service and therefore selections
26 were based on lowest prices.

27 **Q. Did Eversource have a market price expectation as to the results of the procurement,**
28 **and how did results compare to expectations?**

29 A. Eversource independently prepares a “proxy” supplier price – our own internal analysis,
30 prepared on the same date as suppliers’ offers are due, to evaluate the reasonableness of the
31 offers received. While a sound process properly run, and robust participation, are the most
32 preferred attributes of any open solicitation process, a consistently calculated proxy price
33 can also serve to calibrate offers received to an objective reference point and may provide
34 some credibility or “feel” for the veracity of outcomes. Eversource’s affiliates have in

1 other jurisdictions over the past many years utilized an approach described below, and the
2 Company has replicated that approach for use in this solicitation.

3 In current markets, energy and capacity costs represent approximately 85-90% of the full
4 requirements cost to serve load (excluding RPS requirements). Eversource calculates the
5 costs of those components, and then applies low and high factors to account for all other
6 cost elements. The energy component is calculated utilizing forecasted monthly loads, the
7 number of peak and off-peak hours in each month of the delivery term, and peak and off-
8 peak energy market prices as of the RFP due date, to arrive at a load-weighted average
9 energy cost for the term. For the capacity component, Eversource converts ISO-NE's
10 forecast of regional capacity costs (based on known capacity prices) and loads to monthly
11 \$/MWh rates, and then uses the same forecasted monthly loads as for the energy
12 component to arrive at a load-weighted capacity price for the term. In attachment FBW-3
13 these components are shown in the first eleven rows of each of the Large and Small
14 Customers tables. The low and high factors mentioned above are applied to the energy
15 component and incorporate other cost elements such as hourly load weighting, ancillaries,
16 ISO-NE administrative costs, and supplier risk premiums and profits. The ratioed-energy-
17 components and capacity component are then added together to provide a range within
18 which suppliers offers might be expected to fall.

19 The factors are developed from prior winning offers by removing the then-applicable
20 capacity component, and dividing the net by the then-calculated energy component. Over
21 time a family of factors from several prior RFPs are accumulated, and from that group the
22 low and high factors are used to set the range for an upcoming RFP. The Company has
23 "borrowed" the factors from other jurisdictions where Eversource conducts full
24 requirements service RFPs and will over time incorporate more iterations from New
25 Hampshire solicitations until only New Hampshire RFP results are utilized. Factors
26 developed from the Company's three prior RFPs have been incorporated into the group of
27 historical factors used in the evaluation of this RFP's results.

28 To be sure, there is not a perfect approach that can account for all the current inputs and
29 factors that go into suppliers' decisions affecting their current offers. The approach
30 Eversource uses is intended to represent an approximation of where offers may come in
31 based on winning suppliers' approaches during previous solicitations. Overall, the analysis
32 is based on some known market prices and the Company's knowledge and experience in
33 the New England power markets. The proxy price results are shown in Attachment FBW-
34 3, to which suppliers' period average prices from FBW-2 can be easily compared. The

1 company views the winning offers for both Large and Small customers, when compared to
2 projected price ranges, as reasonable and acceptable.

3 **IV. RENEWABLE PORTFOLIO STANDARDS**

4 **Q. Previously you stated that the procurement of full requirements Energy Service did**
5 **not include RPS obligations. How will Eversource fulfill the RPS requirements**
6 **associated with Energy Service?**

7 A. In accordance with the Settlement Agreement in Docket No. DE 17-113, Eversource will
8 manage its RPS needs outside of the ES RFP process. Consistent with the manner
9 employed by Eversource for ES customers in New Hampshire over many previous years,
10 by Eversource's affiliated companies in other jurisdictions, and by other New Hampshire
11 utilities, Eversource will fulfill RPS requirements through purchases from the issuance of
12 periodic RFPs, through purchases directly from producers, or through the bilateral market.

13 Regarding fulfillment of Class I Renewable Energy Certificate ("REC") requirements,
14 Eversource will continue to purchase Class I RECs from the Burgess BioPower and
15 Lempster Wind facilities under existing PPAs. The REC amounts purchased from these
16 sources may more than meet Energy Service obligation quantities, eliminating the need for
17 other Class I purchases.

18 **Q. How will RPS requirements be reflected in Energy Service customers' rates?**

19 A. Eversource has established a RPS Adder rate based on REC class percentage requirements,
20 current market price information as of the full requirements power supply RFP due date,
21 and any RECs currently existing in inventory. Development of the RPS Adder is outlined
22 in Attachment FBW-4. In this manner, the RPS component of Energy Service rates will
23 reflect the current expected cost of RPS compliance obligations. The RPS Adder and the
24 rate developed to recover the costs of full requirements power supply procurements from
25 suppliers will be two components of the overall Energy Service rate. Please refer to Ms.
26 Menard's testimony which addresses Energy Service rate development.

27 **Q. Are there any provisions unique to the Burgess BioPower and Lempster Wind PPAs**
28 **due to the situation discussed above?**

29 A. Since the 2015 Agreement calls for the costs of those PPAs to be recovered via the
30 Stranded Cost Recovery Charge ("SCRC"), a transfer price must be set for Class I RECs
31 obtained under those PPAs which are used to satisfy the RPS compliance needs of ES
32 customers. Eversource has established the Class I transfer price according to the

1 Settlement Agreement and the methodology described in the June 28, 2017 Joint Testimony
2 of Shuckerow, White and Goulding in Docket No. DE 17-113. The \$/REC transfer price is
3 the current market price for Class I RECs shown in Attachment FBW-4, and the volume of
4 Class I RECs needed for RPS compliance for Energy Service during August 2019 through
5 January 2020, will be transferred at that price.

6 **V. CONCLUSION**

7 **Q. How does Eversource view the outcome of its solicitation for the provision of Energy**
8 **Service for August 1, 2019 through January 31, 2020?**

9 A. Eversource believes this filing describes a successful solicitation process resulting in
10 reasonable market-based power supply rates for the Company's Energy Service customers.

11 **Q. What is the plan for the provision of Energy Service after January 31, 2020?**

12 A. Eversource plans to issue a RFP for the Large and Small Customer groups in late October
13 2019 for Energy Service over the period February 1, 2020 through July 31, 2020. For
14 purposes of notice to the Commission, the following illustrates Eversource's proposed
15 schedule for the next RFP:

16 Issue RFP	Thursday, October 31, 2019
17 Final Offers Due	Tuesday, December 3, 2019
18 Filing	Thursday, December 5, 2019
19 Requested PUC Decision	No Later Than, Thursday, December 12, 2019

20 **Q. Does that complete your testimony?**

21 A. Yes, it does.