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August 23, 2019

Debra Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 19-XXX
Public Service Company of New Hampshire d/b/a Eversource Energy

2019 Least Cost Integrated Resource Plan

Dear Director Howland:

Enclosed for filing, please find the petition and supporting documentation for the 2019 Least Cost integrated Resource Plan for Public Service Company of New Hampshire d/b/a Eversource Energy. Please note, pursuant to Order No. 26,262 (June 14, 2019) in Docket No. DE 15-248, this filing is a "limited" filing as described in that order, rather than a "full" filing.

If you have any questions, please do not hesitate to contact me. Thank you for your assistance with this matter.

Very truly yours,



Matthew J. Fossum
Senior Regulatory Counsel

Enclosures

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

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

Docket No. DE 19-XXX

2019 Least Cost Integrated Resource Plan

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY'S PETITION FOR APPROVAL OF ITS
2019 LEAST COST INTEGRATED RESOURCE PLAN**

Pursuant to N.H. Code Admin. Rule Puc 202.01 and Puc 203.06 and RSA 378:39, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “the Company”) hereby petitions the Commission for review and approval of its 2019 Least Cost Integrated Resource Plan (“LCIRP”). In support of this Petition, Eversource states as follows:

1. On June 19, 2015, Eversource submitted its last LCIRP as required by RSA 378:38 and Order No. 24,659 (May 1, 2014), as clarified by the Commission in Order No. 25,676 (June 12, 2015) (the “2015 Plan”). Ultimately, a settlement agreement on the 2015 Plan was reached between Eversource and the Commission Staff and approved by the Commission in Order No. 26,050 (August 25, 2017). The settlement agreement relating to the 2015 Plan provided, in relevant part, that at the time it filed its next LCIRP, Eversource would provide the information required by RSA 378:38, as well as additional information as outlined in the agreement.

2. Pursuant to RSA 378:38, “each electric and natural gas utility, under RSA 362:2, shall file a least cost integrated resource plan with the commission within 2 years of the commission’s final order regarding the utility’s prior plan, and in all cases within 5 years of the filing date of the prior plan.” In that Eversource’s 2015 Plan filing was made on June 19, 2015, Order No.

26,050 provided that Eversource's next LCIRP would be due within 2 years of that date, or August 25, 2019.

3. On February 12, 2019, the Commission Staff submitted its recommendation on grid modernization in Docket No. IR 15-296. Among other things, the Staff's recommendation proposed that the LCIRP be replaced by a new submission, an Integrated Distribution Plan or IDP. This new IDP, the form of which is not yet settled, would have some elements of the old LCIRP as well as new requirements. In recognition of the possibility of requiring this new submission for Commission review and approval, the Staff recommended:

The IDP will require approximately 12 months to develop, using the comprehensive LCIRP template with the incorporation of the grid modernization initiatives plus an engaged stakeholder process. Eversource and Liberty Utilities are required to file their next LCIRP to the Commission by August 25, 2019, and July 1, 2019, respectively, and Unitil is required to file its LCIRP by January 9, 2020. Staff recommends that, if necessary, the utilities request that the LCIRP filing requirement be waived by the Commission, pursuant to RSA 378:38-a, in order to enable the utilities to submit the more robust, integrated, and transparent IDPs.

February 12, 2019 Staff Recommendation in Docket No. IR 15-296 at 67.

4. In light of that recommendation, on April 9, 2019, Eversource filed a motion seeking a waiver of the requirement to make an LCIRP filing by August 25, 2019. On June 14, 2019, the Commission issued Order No. 26,262 in Docket No. DE 15-248 and partially granted the waiver requested by Eversource. The Commission concluded that due to its "pending investigation on grid modernization, IR 15-296, and the anticipated timing of an IDP filing. . . a waiver of the August 25, 2019, filing deadline for Eversource will allow a more efficient use of utility resources." Order No. 26,262 at 5. Accordingly, the Commission did not require a submission by August 25, 2019 containing the elements of a full LCIRP filing.¹

¹ The Commission also declined to waive the 5-year requirement of RSA 378:38, but that conclusion does not bear upon this submission.

5. In granting its waiver, however, the Commission ordered that Eversource make a more limited filing by August 25, 2019, and that the “purpose of that filing will be to ensure that Eversource is adhering to the commitments made in its prior approved LCIRP.” *Id.* at 6.

Specifically, the Commission ordered:

Our prior approval of Eversource’s 2015 LCIRP contained a number of specific deliverables and we will require updates of those no later than August 25, as listed below:

- Confirmation that the utility is currently following the process of system planning utilizing those established procedures, criteria, and policies outlined in its 2015 LCIRP, and achieving the objectives included in its 2015 LCIRP;
- A copy of the Eversource-UES and Eversource-NHEC Joint Recommendations Report from each of the most recent joint planning meetings with UES and with NHEC;
- 2019 Organization charts for field distribution operations, planning, and engineering;
- An updated crew complement report (include bucket crews, digger crews, and troubleshooters assigned to each area work center in all five regions) for 2017, 2018, and 2019;
- The Company’s evaluation of targeted energy efficiency solutions for potential projects for 4 & 12 kV substations due to loading;
- An update on the HeatSmart customer recertification results;
- A copy of the most recent list of proposed capital projects which were presented to senior management for consideration of approval; and
- Details regarding the steps taken through each state of the Planning Process Flow for each of the highest-cost distribution capital projects with a status of In Service, Under Construction, or Planned, within the prior two years, and a demonstration of how the LCIRP plan was followed through the planning process.

We will not require Eversource to update its distribution automation plan or its customer engagement platform in the August 25, 2019, filing. Although those items were included in the order approving the 2015 LCIRP, they will be covered in more detail in the IDP.

Id. at 6-7. Consistent with the Commission’s directive in Order No. 26,262, Eversource includes in this submission the updated information required by the Commission.

6. Along with this petition, the Company has included numerous attachments demonstrating its compliance with the items identified above. Accordingly, Eversource has incorporated the requirements of the relevant settlement agreement and the Commission’s order,


and requests that the Commission review and approve this LCIRP filing consistent with RSA 378:39.

WHEREFORE, Eversource respectfully requests that the Commission:

- A. Review and approve Eversource's 2019 LCIRP; and
- B. Grant such further relief as is just and equitable.

Respectfully submitted,
Public Service Company of New Hampshire d/b/a Eversource Energy
By Its Attorney

Dated: August 23, 2019

By: 
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