

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
DE 20-092
ELECTRIC AND GAS UTILITIES
2021-2023 Triennial Energy Efficiency Plan
New Hampshire Electric Cooperative, Inc.’s
Motion for Waiver of Requirement in Order No. 26, 579
for Service-Rendered Billing

NOW COMES, New Hampshire Electric Cooperative, Inc. (“NHEC”), by and through its undersigned attorney, and respectfully moves the New Hampshire Public Utilities Commission (“the Commission”) to waive the provision in Commission Order No. 26, 579 requiring that the rates contained Order No. 26, 440 be reinstated on a service-rendered basis as of February 10, 2022 (the date of Order No. 26, 579). For the reasons discussed below, NHEC respectfully requests that it be permitted to bill the System Benefits Charge (“SBC”) rate authorized by Order Nos. 26, 579 and 26,440 effective on a bills-rendered basis commencing March 1, 2022.

1. NHEC is a non-profit, member-owned electric cooperative that is subject to limited regulation by the Commission. *See* RSA 362:2, II.
2. Along with the other New Hampshire electric utilities, NHEC offers energy efficiency programs that are approved by the Commission and funded by the SBC rate established by the Commission.
3. By Order No. 26,553 issued November 12, 2021, the Commission set the 2022 SBC rate at \$0.00373 per kWh. Pursuant to said order, NHEC filed a compliance tariff with the

Commission on December 13, 2021 indicating that the SBC rate would be effective “with bills rendered from January 1, 2022 to December 31, 2022”.

4. On February 10, 2022, the Commission issued Order No. 26,579 which suspended the rate provisions of Order No. 26,553 and reinstated the SBC rate set by Order No. 26,440 on December 29, 2020. The Commission required that the reinstated SBC rate (i.e., \$0.00528 per kWh) “be applied prospectively, effective, as soon as practicable, on a service-rendered basis, as of the date of this order.” Order No. 26,579, p. 4.
5. NHEC does not bill on a service-rendered basis. As indicated in the quoted tariff language in paragraph 3, above, NHEC charges its customer-members for electricity service on a bills-rendered basis. This means that the rate that is in effect at the time that a bill is issued will apply to all of the kWhs provided to the customer-member during the entire billing cycle (i.e., the period consisting of approximately 30 days immediately prior to the meter reading date).
6. NHEC’s billing software is different than that used by some investor-owned utilities which can apply different rates to different days within a calendar month. NHEC uses cooperative billing software which is not configured to apply split-month billing. Because NHEC’s billing system is incapable of billing different rates during a single calendar month, all NHEC rate changes must occur on the first day of a calendar month.
7. Given NHEC’s long-standing practice of applying new rates on a bills-rendered basis commencing on the first day of a calendar month, and given that Order No. 26,579 states that the SBC rate change should be implemented “as soon as is practicable”, NHEC proposes to implement the new SBC rate with bills rendered commencing March 1, 2022. This means that some customer-members, (i.e., those billed in the cycles that reflect

service provided in February prior to February 10, 2022) will be billed at the new, higher rate for the entire billing cycle.

8. To the extent that the above-described proposal for implementing the SBC rate change is inconsistent with the Commission's directive in Order No. 26,579, NHEC respectfully requests a waiver from the service-rendered requirements of said order.

WHEREFORE, NHEC respectfully requests that the Commission:

- A. Waive the requirement in Order No. 26,579 that NHEC implement the SBC rate change on a service-rendered basis;
- B. Permit NHEC to implement the SBC rate change required by Order No. 26,579 on a bills-rendered basis commencing March 1, 2022; and
- C. Grant such further relief as may be appropriate.

**NEW HAMPSHIRE ELECTRIC
COOPERATIVE, INC.**

By its Attorneys,
ORR & RENO, P.A.



By:

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Dated: February 14, 2022

Certificate of Service

I hereby certify that on the above date a copy of this Motion was sent by electronic mail to persons listed on the Service List in the above-captioned docket.

A handwritten signature in blue ink that reads "Susan S. Geiger". The signature is written in a cursive style with a large initial 'S'.

Susan S. Geiger

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