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Via electronic mail only

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 22-060 - Consideration of Changes to the Current Net Metering Tariff Structure, Including Compensation of Customer-Generators
Eversource timeframes for responses to Commission information requests

Chairman Goldner:

In response to the Commission's request in Order No. 27,085 that the utilities provide timeframes needed to respond to each of the Commission information requests issued on November 25, 2024, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") provides the following information regarding the time in which the Company is able to respond.

As an initial matter, the Company would like to explain that at the time the motion to stay was filed, the Company was still trying to ascertain what would be required to answer the Commission's requests. The new phases of the docket were not anticipated and just recently commenced, and because Eversource's rate case is currently demanding the same key staff resources that would be needed to respond to these requests, the Company had difficulty determining right away what would be needed to provide satisfactory responses. Because the Company could not yet ascertain the exact level of effort and time required to produce responses to the Commission's requests, Eversource took what appeared to be the most labor intensive of those requests (question 2) and produced a ballpark estimate of eight weeks based on the quantity of data requested and the fact that Eversource has two separate systems from which to cull the majority of that information for a combined total of 17,267 net metered customer accounts. The Company offered that estimate for the motion to stay, as it was the best assessment the Company had at that time.

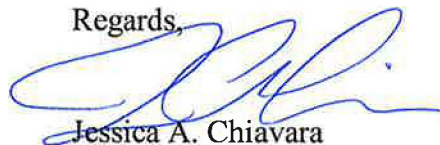
Upon further review, it is anticipated that the Company will be able to respond to all but question 2 by the original December 20 deadline. Question 2 is anticipated to take four weeks from today, January 9, to produce an answer because in addition to gathering the data from two billing systems, a third separate system will be needed to gather two of the data elements within the request, which will take more time than if all data were in one system. It should also be noted that it appears there is certain information the Company does not have, detailed on the next page. The Company is attempting to gather as much of the requested information as can be readily acquired, and intends to address the following subparts of question 2 in the manner detailed on the following page:

- a. The Company can provide this information.
- b. The Company does not enter a designation of business or residence into its billing systems. However, a reasonable assumption can be made that if a customer is on residential Rate R, the customer-generator is a residence, and if on any other rate (i.e. Rate G, GV, or LG) the customer is a business. There may be exceptions where this assumption is not accurate, but will hold true in the large majority of cases.
- c. The Company can get this from its distributed generation application processing software—a separate system from its billing system—and will endeavor to synthesize the information into one list. However it is possible that the two lists will need to be maintained in separate tabs if the lists cannot be synthesized.
- d. This element is in the same system as subpart (c) and will be produced accordingly.
- e. Eversource’s billing systems do not tag customer-generators by small and large as defined in the Puc 900 rules. However, in general customer-generators in Eversource’s C2 billing system are small, and those in the Large Power Billing system are large customer-generators. This assumption is likely not 100% accurate, there will be exceptions, but this is the closest information to that requested by the Commission that the Company could readily provide.
- f. Eversource does not maintain property records or track property information in either the application process or its billing systems and so does not have this data.
- g. Eversource does not have information for behind the meter consumption that the customer-generator takes from its own generation but can provide total front-of-the-meter consumption. As part of the RRA rate docket, Eversource does estimate behind the meter consumption as avoided sales, but these are Company calculations and not data. That information can be found in Docket No. DE 24-035, Attachments of S. Anderson, beginning on Bates page 134.
- h. Eversource does not have information for production that is consumed by the customer-generator behind the meter but can provide all production that is exported to the distribution system. But again, as part of the RRA rate docket, Eversource does estimate total generation for the purposes of calculating lost base revenue, but these are Company calculations and not data.

Eversource will file as many responses jointly with the other electric utilities as possible, and those responses will be filed with all others except for question 2 by December 20. For question 2 the Company respectfully requests that the Commission grant an extension until January 9, 2025.

Consistent with current Commission policy this filing is being made electronically only; paper copies will not follow. If you have any questions, please have the clerk’s office contact me. Thank you for your assistance with this matter.

Regards,



Jessica A. Chiavara

Senior Counsel, Eversource Energy

cc: DE 22-060 service list