

**THE STATE OF NEW HAMPSHIRE BEFORE THE
PUBLIC UTILITIES COMMISSION**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY**

Docket No. DE 23-XXX

PETITION TO APPLY SPECIAL PROVISIONS OF RATE B TO VELCRO USA Inc.

Pursuant to New Hampshire Code Admin. Rules Puc 203.06 and the terms of NHPUC No. 10 Tariff for Electric Delivery Service (“Tariff”), Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) respectfully submits this petition to the New Hampshire Public Utilities Commission (“Commission”) for approval to invoke the special provisions under Rate B of the Tariff for Eversource customer Velcro USA Inc. (“Velcro”). In support of this petition, the Company provides the following information for the Commission’s consideration.

1. Velcro is a Rate B customer, which means it has its own generation that provides much of its load requirements. Rate B is mandatory for customer-generators that would otherwise qualify for Rates G or GV, and require conjunctional service, which is where Eversource provides service in addition to the customer’s generation, as opposed to customers that have generation solely for backup or emergency purposes.¹

2. During the years 2016-2019, Velcro implemented certain energy efficiency measures and engine controls that significantly impacted its energy usage profile and backup and supplemental demand requirements. Because of this work, and at Velcro’s request, Eversource conducted a customer review, analyzing Velcro’s usage compared to its

¹ See Tariff at Original Pages 18 and 70.

operations and billings. This analysis revealed that the standard application of Rate B was limited in its ability to accurately capture the operating characteristics of Velcro's generator with the energy efficiency and engine controls upgrades included.

3. The first Special Provisions clause for Rate B in the Tariff, on Original Page 73 states: "the Company may include such other provisions in Customer's Service Agreement . . . as may be necessary to reflect the specific circumstances of such Customer, the operating characteristics of Customer's generating equipment or any other particular facts, without limitation, which are necessary, in the Company's sole judgment and subject to Commission approval, to give effect to the purpose and intent of this rate."
4. After thoroughly reviewing the comparative analysis of Velcro's usage, operations and billings, Eversource has determined that the impact on operations due to the upgrades implemented by Velcro warrant the inclusion of additional provisions to better reflect the purpose and intent of Rate B. Given the limitations of the standard application of Rate B when applied to Velcro's upgraded operations, Eversource designed modified billing parameters as reflected in the special provision narrative, attached to this petition.
5. These additional billing determinants are more responsive to the backup and supplemental service needs of Velcro, and therefore parallel Velcro's operations, as Rate B is intended to do. This is supported by the affidavit of Edward A. Davis, Director of Rates for Eversource, also attached to this petition. Since the application of the Special Provisions clauses more accurately reflects the intent of Rate B, the modified billing parameters collect an appropriate amount of revenue and create no unreasonable cost shifts either within Rate B or among rate classes. And though application of the Special Provisions clauses is at the sole discretion and judgment of the Company, Eversource presented the

proposed modified billing provisions to Velcro, and Velcro supports the Company's assessment and application of the Special Provisions. Likewise the New Hampshire Department of Energy ("DOE") has analyzed Eversource's proposed modifications to Velcro's billing determinants and has found them to be appropriate and reflective of Velcro's operations.

6. Because the Special Provisions in Rate B of the Company's Tariff allow the Company to invoke them using the Company's sole judgment, without limitation, to better effectuate the intent of Rate B, this is not a change in rates, it is merely a more precise application of an already existing, Commission-approved rate. Additionally, both the affected customer and the DOE support the Company's proposed application of the Special Provisions clauses. Therefore, Eversource respectfully requests that the Commission approve via order *nisi* the application of the Special Provisions clauses in Rate B as provided for in the attachment to this petition.

WHEREFORE, Eversource respectfully requests that the Commission:

1. Approve via order *nisi* the Company's use of the special provisions section of Rate B in the Tariff to bill Velcro as described in the special provision narrative and supported by the affidavit attached to this petition; and
2. Order any further relief as may be just and reasonable

Respectfully submitted this 22nd day of August, 2023

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A
EVERSOURCE ENERGY**



By: _

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

Dated: August 22, 2023



Jessica A. Chiavara