

ORIGINAL

RE: DE 24-094

PUC HEARING

September 13, 2024



AVICORE REPORTING

15 Constitution Drive, Suite 1A • Bedford, NH 03110 • (603) 666-4100
info@avicorereporting.com • www.avicorereporting.com

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

September 13, 2024 - 9:00 a.m.
21 South Fruit Street, Ste 10
Concord, New Hampshire

ORIGINAL

RE: DE 24-094
Public Service Company of New Hampshire
d/b/a Eversource Energy
Petition for Change in Pole Plant
Adjustment Mechanism Rates

PRESENT: Chairman Daniel C. Goldner, Presiding
Commissioner Pradip K. Chattopadhyay

Ben Martin-McDonough, Esq.,
PUC Legal Advisor

Tracey Russo, Clerk

APPEARANCES:

Reptg. Public Service Company of New
Hampshire d/b/a Eversource:
David K. Wiesner, Esq.

Reptg. New Hampshire Dept. of Energy
Alexandra K. Ladwig, Esq.
(Regulatory Support Division)

Court Reporter: Nancy J. Theroux, NH LCR No. 100

	I N D E X	PAGE
1		
2	APPEARANCES TAKEN	4
3		
4	INTRODUCTORY COMMENTS BY CHAIRMAN GOLDNER	4
5	OPENING STATEMENT:	
6	By Ms. Ladwig	8
7	WITNESS PANEL: JOSHUA LETOURNEAU, IAN FARLEY, YI-AN CHEN, and SCOTT ANDERSON	
8	Witness Panel Sworn In	12
9	Direct by Mr. Wiesner	13
10	Cross by Ms. Ladwig	29
11	Redirect by Mr. Wiesner	71
12	QUESTIONS BY THE COMMISSION	
13	By Cmsr. Chattopadhyay	53
14	By Chairman Goldner	61
15	WITNESS: STEPHEN R. ECKBERG	
16	Witness Sworn In	81
17	Direct by Ms. Ladwig	81
18	Cross by Mr. Wiesner	106
19	QUESTIONS BY THE COMMISSION	
20	By Cmsr. Chattopadhyay	116
21	By Chairman Goldner	124
22	CLOSING STATEMENT:	
23	By Ms. Ludwig	130
	By Mr. Wiesner	133

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

E X H I B I T S

EXHIBITS NO.	DESCRIPTION	PAGE
1	Eversource Energy Petition Pre-filed Testimony and Attachments	130
2	Department of Energy Technical Statement, Stephen Eckberg and Attachments	130
3	Department of Energy, Table 1 Recommended Adjustments to 2024 PPAM Rate, Stephen Eckberg	130
4	Department of Energy, Updated Table 1 from Technical Statement of Stephen Eckberg	130

1 P R O C E E D I N G

2 CHAIRMAN GOLDNER: Good morning. I'm
3 Chairman Goldner. I'm joined today by
4 Commissioner Chattopadhyay.

5 -- we're here this morning for a
6 hearing on Docket No. DE 24-094. Eversource
7 seeks to establish a new pole plant adjustment
8 mechanism or PPAM rate of .93 per megawatt hour
9 to collect \$7,156,419 in costs in calendar year
10 2023. Eversource proposes for this rate to
11 become effective on October 1st, 2024.

12 Our authority to convene a hearing in
13 this matter is provided in RSA Chapter 541-A,
14 374:2, 378:5, and 378:7. The parties' joint
15 exhibit list includes proposed exhibits.

16 Let's start by taking appearances,
17 beginning with the Company.

18 MR. WIESNER: Thank you, Mr. Chairman.
19 Good morning, Commissioners. I'm David Wiesner
20 representing Public Service Company of New
21 Hampshire, doing business as Eversource Energy.

22 CHAIRMAN GOLDNER: Thank you. Thank
23 you. And the New Hampshire Department of Energy.

1 MS. LADWIG: Good morning,
2 Commissioners. Alexandra Ladwig appearing on
3 behalf of the Department. With me today, I have
4 Stephen Eckberg, who is a utility analyst with
5 the Department. And, a side note, Mr. Eckberg
6 leaned over to me briefly when you were speaking,
7 and he wanted to clarify. I think you said per
8 megawatt hour for the rate, and he just wanted to
9 clarify per kilowatt hour.

10 CHAIRMAN GOLDNER: I show .93 per
11 megawatt hour. I spent the afternoon on my
12 chalkboard yesterday trying to figure how to
13 convert from cents per kilowatt hour to dollars
14 per megawatt hour, so maybe I miscalculated.

15 MS. LADWIG: Thank you, Commissioner.
16 We'll -- I guess, we will sort -- sort that out
17 or figure it out --

18 CHAIRMAN GOLDNER: Okay.

19 MS. LADWIG: -- how that ends up
20 working out. Thank you.

21 CHAIRMAN GOLDNER: I show .93, but if
22 that's wrong, please correct me. Thank you,
23 Attorney Ladwig.

1 Okay. Very good. So we'll provide
2 each of the parties an opportunity to make an
3 opening statement prior to testimony. Before
4 doing so, we just wanted to lay out our
5 understanding of the hearing so the parties can
6 respond in their opening statements.

7 After reviewing the filings, including
8 Eversource's petition and attachment, and the
9 DOE's technical analysis, we believe there are
10 four issues that must be addressed in this
11 hearing; namely, the DOE's four recommendations
12 regarding the reduction to the PPAM recovery
13 amount. Therefore, other than adopting pre-file
14 testimony, we believe testimony and
15 cross-examination can be limited to these four
16 issues. Assuming the parties agree, we would,
17 therefore, ask them to limit their testimony to
18 those issues.

19 In addition, we note that, given the
20 proposed effective date, any alterations to the
21 PPAM calculations would need to either be
22 completed in a timely manner, or the effective
23 date would need to be pushed back. Accordingly,

1 assuming the Commission were to adopt the DOE's
2 recommendations, we were interested in what the
3 parties believe would be the best way of
4 realizing the necessary alterations.

5 With that said, we'll now ask the
6 parties to make an opening statement, and let us
7 know whether we have accurately summarized the
8 issues, your position on each of the issues, and
9 whether there are any other issues that must be
10 addressed prior to taking testimony.

11 We'll begin with Eversource.

12 MR. WIESNER: We do not have an
13 opening statement that I will deliver. We'll
14 have our -- as has become our custom, we will
15 have our witnesses provide a very brief summary
16 of the filing, and, in particular, focus on the
17 issues that were raised by the Department's
18 technical statement filed last week, which it
19 seems is the Commission's preference, and we
20 believe it is most efficient this morning to have
21 our witnesses address those points on direct
22 testimony, subject, of course, to
23 cross-examination and Commissioner questioning.

1 CHAIRMAN GOLDNER: Okay. We'll move
2 now to the Department.

3 MS. LADWIG: Good morning. The
4 Department agrees with the Company and the
5 Commission, and we would like to note the
6 Department does largely agree with the
7 calculations done by Eversource in this year's
8 PPAM filing, with the exception of those four
9 recommended adjustments that the Commission
10 noted, which, again, would result in an increase
11 to the revenue component of the PPAM and,
12 ultimately, an overall decrease to the requested
13 PPAM.

14 We would also like to acknowledge that
15 this is only the second year of the PPAM filing,
16 and the first -- the PPAM has four components,
17 and the first year only covers one component. So
18 this is actually the first year considering three
19 of those four components and, really, the first
20 opportunity to kind of figure out how those are
21 actually implemented in practice and what makes
22 sense to actually include in those, and so the
23 Department's recommended adjustments ultimately

1 stem from what ended up being differing positions
2 once those components were actually calculated
3 and done in practice.

4 We'd also just like to acknowledge
5 that the Company invited the Department to engage
6 in productive and open discussions on these and
7 provided any information the Department asked
8 for. And, again, it just comes down to a
9 difference in positions between the Department
10 and the Company on how these should be treated.

11 So with those adjustments, we believe
12 the PPAM proposed by Eversource would be
13 consistent with the language in Order 26,729
14 establishing the PPAM, and we recommend the
15 Commission find, again, with whatever adjustments
16 end up coming out of it -- or I should say
17 whatever amounts end up being implemented as
18 a result of those adjustments, that the
19 Commission finds that the resulting PPAM is
20 just and reasonable and approve it for
21 implementation on October 1st, 2024, or, as the
22 Commission said, if needed, at a later date.

23 Thank you.

1 CHAIRMAN GOLDNER: Okay. I'll just
2 return to Attorney Wiesner, briefly.

3 If the Commission were to agree, in
4 part or in whole, with the Department's four
5 changes, maybe the first question would be, when
6 would the Company need an order in order to
7 implement the change for October 1st?

8 MR. WIESNER: I mean, the more time we
9 have, the better, because there are a number of
10 steps that need to be taken before a rate could
11 be finalized and bills generated and sent.

12 We would certainly not want to see the
13 effective dates slip past October 1st, which is
14 what's required. I think in -- in -- I think
15 that a week's time is sufficient, although not
16 optimal, so that would make it the 23rd or 24th,
17 if that's helpful.

18 CHAIRMAN GOLDNER: Okay. And if the
19 Commission were unable to deliver an order by
20 that time -- I'm hopeful that wouldn't happen,
21 but if we weren't able to deliver by the 24th,
22 then I suppose the answer would be to move it to
23 a November 1st implementation and then collect

1 over the following 11 or 12 months?

2 MR. WIESNER: I don't want to suggest
3 that if we couldn't implement it for October 1st
4 if the order date were later than the 24th.

5 CHAIRMAN GOLDNER: Okay.

6 MR. WIESNER: But -- but I think -- if
7 we can look at that as a target date, that would
8 be most helpful.

9 CHAIRMAN GOLDNER: Okay. Fair enough.

10 Okay. Let's move on to the testimony,
11 starting with Eversource.

12 Eversource is presenting four
13 witnesses here today. One at a time, can you
14 please state your name for the record. You can
15 start on my left.

16 THE WITNESS: (Letourneau) Josh
17 Letourneau.

18 THE WITNESS: (Farley) Ian Farley.

19 THE WITNESS: (Ms. Chen) Yi-An Chen.

20 THE WITNESS: (Anderson) Scott
21 Anderson.

22 CHAIRMAN GOLDNER: It is strange that
23 the red light would mean on. I'm totally with

1 the program on that. I've -- a green light would
2 have been more helpful.

3 Okay. Can you all please raise your
4 right hands.

5 (Whereupon, JOSHUA LETOURNEAU,
6 IAN FARLEY, YI-AN CHEN, and
7 SCOTT ANDERSON were duly
8 sworn by Chairman Goldner.)

9 CHAIRMAN GOLDNER: Thank you. Okay.
10 So the parties now, Attorney Wiesner, are ready
11 for direct. And I will just say, we can dispense
12 a little bit with tradition today. If we just
13 -- if we could just focus the maximum possible
14 on just the four issues and not worry much about
15 the rest of the filing, that would be
16 appreciated.

17 MR. WIESNER: Okay. We can -- we can
18 skip some of the summary that we might have
19 otherwise included.

20 CHAIRMAN GOLDNER: Thank you.

21 MR. WIESNER: But we do need to do
22 introduction and adoption testimony, and we will
23 try to accelerate our way through that.

1 DIRECT EXAMINATION

2 BY MR. WIESNER:

3 Q. So I will start with Ms. Chen. And if I could
4 ask you to please confirm for the record your
5 name and your title with Eversource.

6 A. (Chen) My name is Yi-An Chen, and I am Director
7 of Revenue Requirements for New Hampshire.

8 Q. And can you briefly describe the responsibilities
9 of that role with the Company?

10 A. (Chen) I am responsible for coordinating and
11 implementing revenue requirements calculations
12 and regulatory filings, such as the energy
13 service, strand and cost recovery charge,
14 regulatory reconciliation adjustments, pole plant
15 adjustment mechanisms, and other rates for the
16 Company.

17 Q. And did you prepare the joint testimony and
18 supporting attachments as part of the Company's
19 August 1st filing marked for identification as
20 Exhibit 1?

21 A. (Chen) Yes, I did.

22 Q. And was that joint testimony and supporting
23 materials prepared by you or at your direction?

1 A. (Chen) Yes, they were.

2 Q. Do you have any changes or updates to that joint
3 testimony at this time?

4 A. (Chen) No, I do not. Although, I will note that
5 in the RRA filing, Docket DE 24-035, the audit
6 sampling report issued by Deloitte & Touche noted
7 an amount of \$418.89 that should have been
8 allocated to the RRA and not to the PPAM. We do
9 not believe that change will have any material
10 impact on the rate submitted for Commission
11 approval in this proceeding, so we propose to
12 address that minor discrepancy in next year's RRA
13 and PPAM filings rather than this in docket.

14 Q. And do you adopt your joint testimony for the
15 purposes of today's hearing as it was written and
16 filed?

17 A. (Chen) Yes, I do.

18 Q. Now, turning to Mr. Anderson. Again, would you
19 state your name and title with Eversource for the
20 record?

21 A. (Anderson) My name is Scott Anderson. I'm the
22 Manager of Rates for New Hampshire.

23 Q. And what are your responsibilities in that role?

1 A. (Anderson) I'm responsible for activities
2 related to rate design, cost of service, and
3 rates administration for the Company.

4 Q. And did you file joint testimony, together with
5 supporting attachments, as part of the Company's
6 August 1st filing marked for identification as
7 Exhibit 1?

8 A. (Anderson) Yes, I did.

9 Q. And was that joint testimony and supporting
10 attachments prepared by you or at your direction?

11 A. (Anderson) Yes, they were.

12 Q. Do you have any changes or updates at this time?

13 A. (Anderson) One minor typo correction on Bates
14 page 13 of the direct testimony on Line 7. The
15 decrease to the current PPAM average rate should
16 be 52 percent, not 0.5 percent.

17 Q. And with that one correction, do you adopt your
18 testimony today as it was written and filed?

19 A. (Anderson) Yes, I do.

20 Q. Thank you. Now, turning to Mr. Letourneau.
21 Would you please state your name and title with
22 the Company for the record.

23 A. (Letourneau) Good morning. My name is Joshua

1 Letourneau, Manager of Distribution, Capital
2 Projects and Operations Support.

3 Q. And what are your responsibilities in that role?

4 A. (Letourneau) I am responsible for leading
5 development and executing -- execution of
6 distribution capital projects and customer
7 operations support team, collaborating with
8 internal and external stakeholders. I oversee
9 and am responsible for all operational,
10 financial, and administrative requirements for
11 distribution projects and customer operations
12 support.

13 Q. And have you previously testified before this
14 Commission?

15 A. No, I have not. This is my first time testifying
16 here.

17 Q. You are a newbie.

18 Did you file joint testimony and
19 corresponding attachments as part of the
20 Company's August 1st filing marked for
21 identification as Exhibit 1?

22 A. (Letourneau) Yes, I did.

23 Q. And what parts of that joint testimony were you

1 responsible for?

2 A. (Letourneau) I'm responsible for the sections of
3 the joint testimony addressing the Company's pole
4 inspection program and pole attachment fees,
5 revenues received from the Consolidated
6 Communication and other third-party attachers.

7 Q. And were the testimony and supporting materials
8 prepared by you or at your direction?

9 A. (Letourneau) Yes, they were.

10 Q. And do you have any changes or updates to make to
11 that testimony at this time?

12 A. (Letourneau) No, I do not.

13 Q. Do you an adopt your testimony today as it was
14 written and filed?

15 A. (Letourneau) Yes, I do.

16 Q. And now lastly, turning to Mr. Farley.

17 Please state your name and title with
18 the Company for the record.

19 A. (Farley) Good morning. My name is Ian Farley.
20 I'm the Manager of Vegetation Management.

21 Q. And what are your responsibilities in that
22 manager role?

23 A. I'm responsible for providing support to the

1 Company's New Hampshire vegetation management
2 program.

3 Q. And have you previously testified before the
4 Commission?

5 A. (Farley) I submitted pre-file testimony in the
6 Company's recent RRA rate adjustment filing.

7 Q. And did you file joint testimony and
8 corresponding attachments as part of the
9 Company's August 1st filing marked for
10 identification as Exhibit 1?

11 A. (Farley) Yes, I did.

12 Q. And what parts of that joint testimony and
13 supporting materials are you responsible for?

14 A. (Farley) I'm responsible for the sections
15 regarding the Company's vegetation management
16 plan and activities and related work performed
17 with respect to the poles acquired from
18 Consolidated Communications in 2023.

19 Q. And was that testimony and supporting materials
20 prepared by you or at your direction?

21 A. (Farley) Yes, they were.

22 Q. Do you have any changes or updates to make at
23 this time?

1 A. (Farley) No, I do not.

2 Q. And do you adopt your testimony today as it was
3 written and filed?

4 A. (Farley) Yes, I do.

5 Q. So now I'll turn to Mr. Letourneau, and we'll
6 begin addressing the recommendations that were
7 raised in the Department's technical statement,
8 marked as Exhibit 2 for this morning's hearing.

9 Mr. Letourneau, in the Department's
10 technical statement, there seems to be an
11 implication that Consolidated's third-party
12 attachers were not, in fact, billed for the
13 months of May and June of 2023 following the pole
14 acquisition transaction with the Company that
15 closed in May of last year; is that accurate?

16 A. (Letourneau) No, it is not accurate to say the
17 CCI third-party attachers were not billed for the
18 months of May and June of 2023.

19 Following the acquisition closing
20 effective May 1st, 2023, CCI's practice was to
21 bill its third-party attachers in January of each
22 year, with some billed for a six-month period and
23 some billed for a full calendar year. So, at the

1 time of the May 1st closing, CCI had already
2 issued bills to its third-party attachers for a
3 period running through the end of June 2023 and,
4 in some cases, through the end of December 2023.

5 Q. And did Consolidated collect those billed amounts
6 and pay them over to the Company for periods from
7 and after May 1st, 2023?

8 A. (Letourneau) Yes, consistent with the Company's
9 agreement with CCI, it is receiving those
10 third-party attachment fee payments and paying
11 them over to the Company on a prorated basis for
12 any period covering May through December 2023.

13 CCI has -- sorry. CCI had received
14 and paid over to the Company in excess of
15 \$486,000 from the third-party attachers as of
16 February 2024, representing almost all of what
17 was billed by CCI for 2023. That should be paid
18 to Eversource for post-closing periods, and that
19 total amount includes amounts billed to the
20 third-party attachers with respect to the months
21 of May and June 2023.

22 Q. Does the Company's PPAM rate adjustment filing
23 account for those CCI payments for the

1 third-party attachment fee billings it had
2 collected and paid over to Eversource?

3 A. (Letourneau) No, it does not. Not this year.
4 Because those payments were not received until
5 early 2024, they were not included in this
6 filing, which only covers PPAM costs and related
7 pole attachment revenues for calendar year 2023.
8 And because the Company was not issuing the
9 invoices to the attachers, the billed amounts
10 were not occurred to the 2023 calendar year
11 accounting.

12 Q. Now, turning to the question of late fees.

13 Can you provide an explanation of why
14 the Company did not bill any former CCI pole
15 attachers until December of 2023?

16 A. (Letourneau) Following the closing of May 2023
17 and in collaboration with CCI during the
18 post-closing transition, a significant amount of
19 time was needed to receive and process CCI's
20 records regarding its third-party attachment
21 billings. It was necessary to determine which
22 attachment fees involved poles acquired by
23 Eversource, given that CCI's service territory is

1 not the same as Eversource's.

2 CCI's records, including its prior
3 billings, covered poles located in other electric
4 utility service territories, sometimes in
5 different parts of the same town. And as CCI's
6 billings covered various time periods, it was
7 very important to work through all of that in
8 detail with CCI to ensure that third-party
9 attachers were not to be billed twice, once by
10 CCI and then again by the Company, and the
11 attachers would not be billed for pole -- for
12 pole attachments outside of the Company's service
13 territory.

14 As a result, the former CCI
15 third-party pole attachers were not billed by the
16 Company until December of 2023 for the period
17 covering July through December 2023.

18 Q. And is it fair to say that, because of the timing
19 of those bills issued to the former CCI
20 third-party attachers in December, that those
21 bills were not actually due to the paid until
22 January 2024 at the earliest?

23 A. (Letourneau) Yes, that is correct. The

1 Company's invoices were to be paid within 30 days
2 of their issuance, so bills issued to the
3 third-party attachers in December 2023 were not
4 due for payment until January 2024.

5 Q. And based on that timing, in your opinion, would
6 it have been appropriate to assess any late fees
7 to the former CCI third-party attachers for
8 periods during 2023?

9 A. (Letourneau) No, that would not be appropriate
10 in my opinion, and as previously noted, this PPAM
11 rate adjustment filing only covers CCI
12 pole-related expenses and revenues from calendar
13 year 2023 and not any such expenses and revenues
14 in 2024.

15 Q. And now I'll turn to Ms. Chen and ask, with
16 respect to late fees more generally, is it
17 correct that the Company accrued to 2023 the
18 amounts invoiced to those third-party attachers
19 in December 2023 at the time of the billing?

20 A. (Chen) Yes, that is correct. The PPAM is based
21 on annual amounts and accrual accounting with a
22 calendar year and lookback. Accordingly,
23 customers were effectively credited with amounts

1 billed to the third-party attachers in December
2 2023, when the bills were issued.

3 Q. And so, the total amounts billed were credited to
4 the PPAM rate in 2023, regardless of when the
5 Company received payment for the billed amounts;
6 is that correct?

7 A. (Chen) That is correct. The full pole
8 attachment revenue amounts billed by the Company
9 were credited to the PPAM in 2023, even if
10 payments from the attachers were not received
11 until 2024 or remain unpaid. Meaning that, from
12 a customer perspective, this methodology we use
13 to calculate the PPAM ensures that customers are
14 indifferent as to whether or not the Company
15 receives payment in the year of billing or at a
16 later period.

17 We have credited the PPAM costs by the
18 incremental pole attachment revenues at the date
19 we issued the bill in 2023.

20 Q. And are there any carrying charges that apply
21 to the Company's pole inspection and replacement
22 costs when incurred under the PPAM rate
23 design?

1 A. (Chen) No. Carry costs, at the primary rate
2 only, apply to the over and under recovery
3 balances in the reconciliation and not to the
4 underlying costs components, such as pole
5 inspection and replacement costs. That is a
6 specific feature of the PPAM rate design and is
7 similar to the RRA mechanism.

8 Q. Now, based on those circumstances, would it be
9 appropriate to reduce the PPAM revenue
10 requirement as recommended by the DOE to adjust
11 for imputed late fees on billed, but unpaid,
12 amounts for the third-party attachers?

13 A. (Chen) No, that would not be appropriate in my
14 opinion. Customers are held harmless to a delay
15 in payment, if any; and as a result, it would not
16 be appropriate to apply a late fee -- late
17 payment fees, if any, as a credit to customers,
18 when the PPAM calculation essentially assumes
19 100 percent of the amounts billed are paid at the
20 time they are billed.

21 Q. And what about the pole attachment fees billed in
22 2023 to Consolidated itself per the approved
23 transaction terms?

1 A. (Chen) The same analysis would apply for -- for
2 the third-party attacher billings. The amounts
3 billed to CCI in 2023 were accrued and credited
4 to the PPAM rate at the time of the billing,
5 regardless of when CCI ultimately paid the
6 invoice amounts.

7 Customers received the full credit of
8 those billings for 2023 at the PPAM rate
9 calculation. Accordingly, it would not be
10 appropriate to reduce the PPAM revenue
11 requirements as recommended by the DOE to adjust
12 for imputed late fees on billed, but unpaid,
13 amounts for CCI in my opinion.

14 Q. Thank you, Ms. Chen.

15 I'll now turn back to Mr. Letourneau
16 again. The DOE technical statement recommends
17 that the Company be required to remove from the
18 PPAM rate calculation the expense amount of
19 approximately \$18,000, recorded on Line 2 of
20 Attachment YC-SRA-JDL-IJF-4, Page 1. That's
21 Exhibit 1 at Bates 32.

22 Can you describe in more detail what
23 that expense item covers?

1 A. (Letourneau) Yes. The acquisition of the CCI
2 poles has created more work for tracking
3 third-party attachers. Due to the incomplete
4 data received from CCI following the closing,
5 Eversource is capturing data to make sure there
6 is accurate billing moving forward. That extra
7 work has involved dedication of personal --
8 personnel time and other resources that would not
9 have been required but for the CCI pole
10 acquisition.

11 Q. And is it fair to say that the complexities that
12 you previously referenced that resulted in
13 billings not going out to the third-party
14 attachers until December also were a driver for
15 those increased administrative expenses incurred
16 by the Company?

17 A. (Letourneau) Yes, that would be accurate.

18 Q. And in your opinion, were those additional
19 expenses incurred in order to obtain the value of
20 the third-party attacher revenues that apply as
21 an offset to the PPAM cost components?

22 A. (Letourneau) Yes, it is my understanding that it
23 was, and is, necessary for the Company to incur

1 such additional and incremental expenses in order
2 to obtain the third-party attacher revenues that
3 offset other PPAM expenses -- expense items that
4 factor into PPAM rate calculation.

5 Those costs would not have been
6 incurred but for the Company's acquisition of the
7 CCI pole infrastructure. They are incremental to
8 amounts collected in base rates or elsewhere and
9 are necessary in order to ensure the accuracy of
10 billing -- billings associated with the acquired
11 pole interests.

12 Q. Thank you, Mr. Letourneau.

13 Finally, back to Ms. Chen. Does the
14 proposed PPAM rate adjustment, as filed by the
15 Company, result in rates that are just and
16 reasonable?

17 A. (Chen) Yes, it does.

18 MR. WIESNER: And that is all we have
19 for direct examination this morning,
20 Mr. Chairman.

21 CHAIRMAN GOLDNER: Thank you, Attorney
22 Wiesner.

23 We'll turn now to cross and the New

1 Hampshire Department of Energy.

2 MS. LADWIG: Thank you.

3 CROSS-EXAMINATION

4 BY MS. LADWIG:

5 Q. I'm going to be honest, cross is probably going
6 to be a little bit longer than direct. I'm -- so
7 I'm -- I want to go through, just for ease of
8 organization, the four PPAM elements in order.
9 I'm, again, limiting to issues related to the
10 four issues that are -- the issues related to the
11 four adjustments recommended by DOE.

12 The first category being the pole
13 replacement O&M transfer costs, which are defined
14 with -- defined as the actual cost associated
15 with replacement poles for the prior calendar
16 year, based on the actual number of poles
17 replaced and the actual Eversource costs to
18 transfer the conductor from the old to the new
19 poles.

20 And so I believe the table that best
21 reflects that is in Exhibit 1, Bates 30. And
22 Line 1 shows the number of poles replaced in
23 2023, and that shows 147 poles replaced; is that

1 correct?

2 A. (Letourneau) That is accurate.

3 Q. Line 3 shows a total of recoverable pole
4 replacement O&M transfer cost of \$259,000; am I
5 reading that right?

6 A. (Letourneau) That is accurate.

7 Q. And those were the actual pole replacement
8 transfer costs for 2023?

9 A. (Letourneau) That is accurate as you describe.

10 Q. Line 2 says it's the Eversource cost to transfer
11 the conductor from the old pole to new pole. It
12 looks like that number of \$1,762, that's meant to
13 represent the average cost per pole conductor
14 transfer; am I interpreting that correctly?

15 A. (Letourneau) Could you repeat the question one
16 more time?

17 Q. Sure. So in Line 2, it says it's the
18 Eversource's cost to transfer the conductor from
19 the old pole to the new pole, and then the column
20 on the far right shows \$1,762. And from my
21 reading of what Line 2 -- where those numbers are
22 derived from, it looks like that represents the
23 average cost per pole conductor in 2023?

1 A. (Letourneau) That is accurate.

2 Q. Okay. And so if Eversource already had this
3 total of \$259,000 in actual costs in its records
4 as the amount it's seeking to recover, I was just
5 wondering, what was the purpose of calculating a
6 per pole average?

7 A. (Letourneau) Sorry. I had to put the mic back
8 on. Could you repeat the question one more time?

9 Q. Sure. So it looks like Eversource had that total
10 of \$259,000 actual costs, and it says that comes
11 from Company records, and that's the amount
12 Eversource is seeking to recover in this
13 category. So I was just wondering, what was the
14 purpose of calculating the per pole average on
15 Line 2?

16 A. (Letourneau) We wanted to be transparent in our
17 response.

18 Q. Thank you. And so the \$259,000 is -- that's just
19 the cost to transfer the conductor from the old
20 pole to the new pole, and it doesn't include any
21 other costs associated with the replacement
22 poles, correct?

23 A. (Letourneau) It includes the O&M cost to -- to

1 transfer the pole, correct.

2 Q. And how did -- how did Eversource confirm that
3 the 259,000 was only related to the CCI poles?

4 A. (Letourneau) It was a static list that we were
5 able to derive from the information we received
6 from CCI.

7 Q. Thank you. Moving now to the category of annual
8 inspection costs, and those are defined as the
9 actual inspection costs and other upfront costs
10 for the prior calendar year, consisting of the
11 number of poles inspected in the former
12 Consolidated maintenance area and the per pole
13 rate in effect, upfront cost of \$250,000 in Years
14 1 and 2, and \$75,000 in Year 3 will also be
15 included.

16 Since that says there's \$250,000 in
17 Year 1 and 2 upfront costs that would be included
18 in that component, it doesn't look -- I can't
19 find that number anywhere in this filing, and I
20 was curious why that would be.

21 A. (Chen) It is my understanding that there were no
22 upfront costs in 2023, so we did not -- you are
23 accurate; we did not include any of those

1 references in that notation here on the schedule
2 in the table up above.

3 Q. Thank you. And on Bates 31 of Exhibit 1, it has
4 the -- Line 2 has the per pole -- I believe that
5 shows the per pole rate in effect, and how is
6 that determined?

7 A. (Letourneau) Line 2? Can you tell me the amount
8 that you're seeing as well?

9 Q. Sure. It looks like it says \$94.61 as the
10 effective per pole rate.

11 How did the Company determine that
12 rate?

13 A. (Letourneau) Thank you. Yeah, we had a
14 contractor complete the inspection, and that was
15 the per unit price per pole.

16 Q. Thank you. Turning now to pole attachment
17 revenue, which is defined as the incremental
18 third-party pole attachment revenues that will be
19 applied as an offset to the items in A and B.
20 Pole attachment revenue for formerly
21 Consolidated-owned poles will be tracked
22 separately and billed at the Consolidated rate at
23 the time of closing until a pole -- until a full

1 pole attachment survey is conducted and/or a
2 single unified rate is applied to all poles.

3 So we're going to spend in time here
4 in Exhibit 1, Bates 32. And this category is
5 largely where a lot of DOE's recommended
6 adjustments come from.

7 So in that table in that exhibit, Line
8 1, Pole Attachment Revenue, there are three
9 columns that show an amount of \$1.25 million.
10 Those are in June 2023, September 2023, and
11 November 2023, and those amounts -- those are all
12 amounts billed to CCI by Eversource, correct?

13 A. (Chen) That is correct.

14 Q. Were any of those amounts actually received from
15 CCI during calendar year 2023?

16 A. (Chen) So one of them was -- was received in
17 2023. And the other two were received in 2024.

18 Q. And when was the one in 2023 received?

19 A. Our records show we received on October 17, 2023.

20 Q. Okay. And then the December 2023 column --
21 again, staying on Line 1 -- that shows an amount
22 of \$958,000, and that is the amount that
23 Eversource billed to third-party attachers other

1 than CCI, correct?

2 A. (Chen) That's correct.

3 Q. Were any of those amounts billed in December '23
4 received from the third-party attachers in 2023?

5 A. (Letourneau) They did not -- we did not receive.

6 Q. And that \$958,000, if I'm understanding correctly
7 your testimony on direct, that only covers the
8 months of July 2023 through December 2023; is
9 that correct?

10 A. (Letourneau) That is accurate.

11 Q. And CCI was actually -- they were the ones
12 collecting the revenues for May 2023 and June
13 2023 and then sending them to Eversource,
14 correct?

15 A. (Letourneau) That is correct.

16 Q. Because Eversource was entitled to those revenues
17 as of May 1st, 2023, which was the date the
18 transaction closed, right?

19 A. (Letourneau) You are correct.

20 Q. Does Eversource know the -- you mentioned on
21 direct you received upwards of \$486,000 from CCI
22 as of February 2024.

23 Do you know the amount of -- the total

1 amount of third-party revenues you're owed from
2 May 2023 and June 2023?

3 A. (Letourneau) Repeat the question one more time,
4 please.

5 Q. Sure. So you said you'd received a little over
6 \$486,000 of those revenues that CCI had billed to
7 third-party attachers in May and June of 2023.
8 Do you know the amounts you're owed for those
9 months?

10 A. (Letourneau) In my direct testimony, I had
11 stated we had received a portion, but it's not
12 the total amount.

13 Q. Okay. Do you know the total amount that you're
14 owed -- or that CCI is supposed to eventually
15 send over?

16 A. (Chen) Our -- the -- the information provided to
17 us, the total amount that CCI has billed the
18 other attachers was \$487,158.64.

19 Q. Okay. So you've received most of the revenues
20 for May and June 2023?

21 A. (Chen) That's accurate.

22 Q. Okay. And then Exhibit 2, Bates 55, that's the
23 attachments to the technical statement filed by

1 Mr. Eckberg. It's the very last page of Exhibit
2 2, and it includes the Company's responses to
3 some data requests submitted by the Department.

4 And then at the very bottom, the
5 Company's Response E explains the late payment
6 fee provision of the Pole Attachment Agreement
7 between Eversource and CCI. And, per the
8 agreement, late payment of any bills from
9 Eversource to CCI is subject to a late fee of
10 1.5 percent per month applied to the outstanding
11 balance from the due date of the bill.

12 Have any payments from CCI to
13 Eversource for these pole attachment invoiced
14 amounts been late?

15 A. (Chen) I'd just like to make sure that I
16 captured the question fully. So can -- perhaps
17 it will be helpful if you repeat that whole
18 question again.

19 Q. Sure. So Response E on that page, that explains
20 the late payment fee provision of the Pole
21 Transfer Agreement between Eversource and CCI,
22 and it appears that, per the agreement, late
23 payments of any bill from Eversource to CCI is

1 subject to a late fee of 1.5 percent per month
2 applied to the outstanding balance from the due
3 date of the bill.

4 Have any payments from CCI to
5 Eversource for these pole attachment invoices
6 been late?

7 A. (Chen) Based on the 30-day timeframe, yes. Some
8 of them were -- well, they were late.

9 Q. Okay. And that Response E, it shows, I believe,
10 the dates that the bills were sent to CCI in 2023
11 and the date the payment was received. And so
12 those -- those represent, I guess -- you could
13 use those to calculate the number of days that
14 each payment was late?

15 A. (Chen) Yes, if the late fees were applied.

16 Q. Okay. Has Eversource applied any late payment
17 fees to those billed amounts?

18 A. (Letourneau) No, they have not.

19 Q. Has Eversource attempted to collect any late
20 payment fees from CCI?

21 A. (Letourneau) No, they have not.

22 Q. And why not?

23 A. (Letourneau) Just to make sure my answer is

1 correct -- and I apologize for the delay -- could
2 you repeat the question?

3 Q. Sure. Why has Eversource not attempted to apply
4 or collect late fees on those late payments from
5 CCI?

6 A. (Letourneau) The Company's sundry billing system
7 was modified in a way that resulted in late fees
8 not automatically being charged, and it is a
9 time-consuming manual effort to charge late fees
10 now. The Company has not had the resources or
11 time to charge late fees through a manual
12 process, so no late fees have been assessed to an
13 attacher for this.

14 Q. So does the Company intend to ever update that so
15 that late fees can be assessed?

16 A. (Letourneau) I wouldn't be able to answer that
17 question.

18 Q. Sure. I understand that.

19 If Eversource had collected late
20 payment fees on those amounts, would those late
21 payment fees be included in the revenue portion
22 of the PPAM?

23 A. (Chen) So if -- so this is one of the -- the --

1 I just want to give some perspective to that
2 question.

3 So the late fees, if they were billed,
4 they would be recognized in -- from my
5 understanding, in accounting, as -- in Account
6 450, which is gonna be part of the revenue that
7 the Company receives. And I would also -- so,
8 essentially, if that is how the accounting
9 recognizes the late fee, then they would be
10 picked up in our revenue as part of the PPAM.

11 However, I'd just also like to note
12 that we have not experienced any of the late fees
13 in any other reconciliation filings, and to my
14 knowledge, that this never really came up as an
15 issue before.

16 Q. Okay. Thank you. So if Eversource had charged
17 late payment fees described in the Pole
18 Attachment Agreement, and those were included in
19 the pole attachment revenue in the PPAM, would
20 that pole attachment revenue in the PPAM amount
21 be higher?

22 A. (Chen) Based on what we just discussed, yes, it
23 would. But I also would just like to note that,

1 although the Company has not assessed the late
2 fees to the attachers, the Company still believes
3 that we -- the customers are not harmed in any
4 way, as described in our -- in our testimony
5 earlier, due to we do not -- we credit it back.

6 We do not charge any carrying charges
7 for any costs incurred between calendar year
8 2023, in this case, until the rates are in effect
9 October 1st, 2024. And that we believe that's a
10 very symmetrical way of doing the reconciliation
11 and recognizing how we are -- we are making the
12 customer whole by not harming them in any way, in
13 that, we are passing through the pole attachment
14 revenues when we bill those revenues and not when
15 we are in receipt of those revenues.

16 So we believe that -- with all of
17 those I just noted earlier, we believe that's a
18 symmetrical way of making sure the customers are
19 made whole and not harmed in any way.

20 Q. Sure. Sorry to go back to this, but I just
21 wanted to confirm, if there were late payment
22 fees applied, and those were included in the
23 revenue portion of the PPAM, would that revenue

1 portion of the PPAM amount be higher?

2 A. (Chen) Subject to check with our accounting, I
3 believe that would be true.

4 Q. Sure. And that revenue offsets the other cost
5 elements of the PPAM, right?

6 A. (Chen) Correct.

7 Q. And so if there was that higher revenue amount to
8 offset the other cost components of the PPAM, the
9 PPAM -- total PPAM amount the Company would be
10 requesting would be lower, right?

11 A. (Chen) Correct.

12 Q. And the total PPAM amount, once it's approved and
13 goes into rates, like the Company said on direct,
14 that amount starts collecting carrying charges,
15 right?

16 A. (Chen) That's right.

17 Q. All right. I want to talk now about -- stay on
18 the topic of late payment fees but as it relates
19 to third-party attachers other than CCI.

20 And so that page we were just on,
21 Exhibit 2, Bates 55, Response A, it says -- as
22 you also mention now -- that late payment fees
23 are not being applied to amounts owed by

1 third-party pole attachers other than CCI. And I
2 just want to make sure I understand what you said
3 and confirm.

4 Your response was that Eversource
5 hasn't applied late payment fees because it would
6 be a manual process that, I guess, isn't -- the
7 Company's deemed isn't worth it?

8 A. (Letourneau) Was this in conjunction to CCI or
9 the third-party attachers?

10 Q. The non-CCI, third-party attachers.

11 A. (Letourneau) Could you repeat the question one
12 more time?

13 Q. Sure. So I believe you explained that the reason
14 the Company hasn't applied late payment fees is
15 because there would have to be a manual billing
16 process that's complicated and that is -- could
17 you just explain that and how it relates to late
18 payment fees for third-party attachers?

19 A. Just so I can understand the question correctly,
20 is this the third-party attachees that we
21 acquired through the CCI acquisition?

22 Q. Yes.

23 A. (Letourneau) Okay. I wanted to make sure it

1 wasn't Eversource's third-party attachees.

2 Q. Yes. I appreciate it.

3 A. (Letourneau) We had worked with CCI, and they
4 had a billing system with their third-party
5 attachees, so we weren't able to bill until
6 December of 2023, and it was due to the
7 incomplete data that we received from CCI.

8 Q. Okay. And -- but you didn't attempt to apply
9 late payment charges to those amounts either,
10 right?

11 A. (Letourneau) We did not, because we wanted to
12 make sure that we had the correct billing that
13 would be going to the third-party attachees, and
14 we didn't want to double-bill.

15 Q. Okay. And would the Company attempt to apply
16 late payment fees to those amounts going forward
17 as applicable?

18 A. (Letourneau) For 2024 and beyond, I wouldn't be
19 able to answer that question.

20 Q. Okay. I recognize you might not know the answer
21 to this one either, but I figured I'd ask.

22 Do you know if any of the agreements
23 with those third-party attachers allow for late

1 payment fees or charges?

2 A. Through the CCI contract language that they had
3 with their third-party attachees?

4 Q. Yes. Whatever -- whatever contracts that you're
5 billing them under.

6 A. (Letourneau) I'm not privy to the CCI contract
7 language with the third-party attachees.

8 Q. Sure. Fair. The Company explained that CCI has
9 collected -- or Eversource has received from CCI
10 almost all of the revenue from third-party
11 attachers for May 2023 and June 2023. But the
12 Company indicated in Exhibit 2, Bates 55, again
13 Response A, that third-party attachers owe
14 roughly two-thirds of the total amount billed to
15 them by Eversource.

16 Do you know why CCI was able to
17 collect a majority of the payment owed to it by
18 third-party attachers, but Eversource has only
19 been able to collect one-third?

20 A. (Chen) As I sit here, I do not have the insight
21 into how CCI's collection efforts were or are.

22 Q. Sure. Has the Company attempted to collect
23 outstanding balances from the third-party

1 attachers?

2 A. (Chen) My understanding is the Company has been
3 trying to collect from -- from those
4 third-parties for the outstanding balances.

5 And if I may just add, the discussion
6 earlier on whether or not the Company's prepared
7 to charge CCI or other third-party attachers for
8 late fees, so the Company could implement that
9 approach if directed by the Commission, although
10 we believe the time commitment and related
11 administrative costs would be substantial, as
12 noted earlier in the -- in the testimony.

13 In view of the number of attachers and
14 invoices and various time periods involved, since
15 this is a very manual and not an automatic
16 process due to the system constraints, that
17 increases the administrative burden and
18 associated costs greatly.

19 So the Company believes that the
20 alternative to the DOE's recommendations would be
21 more reasonable and appropriate under these
22 circumstances.

23 Q. Okay. This may be getting a little too generic

1 or outside of what you're able to testify to
2 right now, but do you know, does the Company, for
3 any other third-party contracts, bill late
4 payment fees? Not related to pole attachment,
5 just in general.

6 A. (Letourneau) I don't have the answer as I sit on
7 the stand right now.

8 Q. Okay. Again, like you said, there are no
9 carrying charges associated with the pole
10 attachment revenue amounts billed in 2023 and
11 included in the PPAM. They're just the number
12 that shows up on the invoice, right?

13 A. (Chen) That's correct.

14 Q. And then I want to look at Exhibit 1, Bates 28,
15 and that's the forecast for the rate collection
16 for the PPAM over the next year, but it looks
17 like those numbers in the October 2024 column,
18 those are the totals for each PPAM component from
19 2023; is that right?

20 A. (Chen) That's correct. That's the calendar year
21 2023 cost -- actual cost for the attachment
22 revenue, I'll say.

23 Q. Okay. And so there's the \$259,000 of cost for

1 O&M transferred, the \$44,000 for inspection, the
2 11.3 million -- sorry, I skipped over -- the 11.3
3 million for vegetation management, those are all
4 costs. And then there's the -- we're going to
5 round up to 4.7 million in pole attachment
6 revenues. And so you end up with that 6.9
7 million in recoverable cost that Eversource is
8 seeking to recover from ratepayers through the
9 PPAM; is that correct?

10 A. (Chen) That's correct. Prior to applying any --
11 any carrying charges; that's correct.

12 Q. Okay. And -- and so the 6.9 million, that starts
13 collecting carrying charges as of the date the
14 PPAM rate goes into effect, right?

15 A. (Chen) That's correct.

16 Q. And so, like we talked about earlier, if you add
17 into that revenue component the May and June 2023
18 revenue amount of around \$486,000, any late
19 payment fees from CCI or third-party attachers
20 that could have been assessed, and that would
21 have been included in the 2023 PPAM -- if you add
22 in all of that, the 6.9 million amount would be
23 lower, correct?

1 A. (Chen) That is a correct statement, but I'd just
2 like to reiterate again. If we were -- if the
3 Company were -- were to apply the carrying
4 charges for the costs when they incurred --
5 because the costs definitely were more than the
6 revenue that we received as part of the pole
7 attachment revenue offset. So if the Company
8 were to apply the carrying charges for the costs,
9 the net -- basically, the net would be the costs
10 between when they -- the costs were incurred and
11 when we start to collect those from the customers
12 as of October 1st, 2024, in this case, that would
13 be -- the carry charges would actually be a
14 significant amount.

15 Q. Right. Because there's no carrying charges
16 assessed on any of the four PPAM components until
17 they go into rates?

18 A. (Chen) That's correct.

19 Q. Okay. But just to go back, if all of those
20 amounts, the May and June revenues, any late
21 payment fees, if those were added to the revenue
22 component of the PPAM, that revenue component
23 offsets the expenses, that total PPAM recoverable

1 amount of 6.9 million would be lower, right?

2 A. (Chen) That -- that is a correct statement.

3 Q. And presumably, the associated carrying charges
4 on the 6.9 million would be lower? Sorry, I
5 guess they wouldn't be on the 6.9 million. They
6 would be on the lower amount.

7 A. (Chen) That requires some detailed calculation.
8 Yeah, as I said today, I wouldn't be able to just
9 do a quick calculation on the fly. But -- but
10 the statement was -- the statement was accurate.

11 And then I would just note that the --
12 for -- for the month associated with May and June
13 2023, although the approach would not be
14 consistent to -- to credit the customer through
15 the PPAM in this PPAM rate due to -- we -- we --
16 the way that it's designed is to recognize what
17 was happening in the prior calendar year, which
18 is 2023 in this case.

19 But if we are directed by the
20 Commission, the Company could implement that
21 alternative approach for this PPAM rate
22 adjustment, rather than wait until next year
23 through the reconciliation process, which is how

1 you could -- it usual -- it would work out, based
2 on how the PPAM rate is designed to work.

3 Q. Okay. Thank you. I appreciate that and that
4 explanation.

5 At the risk of going slightly off of
6 the four recommendations, but I just want to
7 touch on a few vegetation management expense
8 questions. The last component of the PPAM --

9 CHAIRMAN GOLDNER: Ms. Ladwig --

10 MS. LADWIG: Yeah.

11 CHAIRMAN GOLDNER: -- I'm sorry, if
12 you could just explain to the Commission why you
13 would like to go off of the four topics that
14 we're dedicated to? Attorney Wiesner only had to
15 discuss the four issues. Is it necessary to go
16 here? Can we move along?

17 MS. LADWIG: Apologies. Yes, we -- we
18 can -- I should have asked permission. And I had
19 forgotten that -- that I had a couple of
20 questions on these. We can probably move along.

21 CHAIRMAN GOLDNER: Okay. Thank you.

22 BY MS. LADWIG:

23 Q. And then my very last question is something that

1 comes from what you mentioned on direct, that
2 there was a \$418, or something, amount that
3 should have been added to the RRA and not the
4 PPAM.

5 Could you just explain that a little
6 bit more? I'm not sure I completely caught it.

7 A. (Chen) Sure. So the audit sampling was directed
8 by the Commission in this RA Docket DE 24-035,
9 and Deloitte & Touche was selected as -- as the
10 auditor to review that. And they have -- so the
11 Company has received that audit -- the
12 independent audit sampling report by Deloitte &
13 Touche, and that was filed. And there is this
14 \$418.89 found that should have been allocated to
15 RRA and not to PPAM.

16 So that's really -- so, ultimately,
17 that's really just the -- the cost being
18 recovered in RRA or PPAM. And since the dollar
19 amount is really immaterial, we do not believe
20 that would impact any of the rates that have been
21 submitted in front of the Commission for
22 approval.

23 Q. Okay. And you said that that will be addressed

1 in next year's PPAM and RRA?

2 A. (Chen) That's correct. So that's why we
3 proposed to address that minor -- very minor
4 discrepancy in next year's RRA and PPAM filing.

5 MS. LADWIG: Okay. Thank you. I just
6 wanted to clear that up, and that's all the
7 questions I had. Thank you all so much.

8 CHAIRMAN GOLDNER: Thank you. We'll
9 turn now to Commissioner questions, beginning
10 with Commissioner Chattopadhyay.

11 BY CMSR. CHATTOPADHYAY:

12 Q. Good morning. To capture what was discussed
13 about the late payment fees appropriately, I want
14 -- I want to go back to that. And is it -- if I
15 understood it to mean that you do not apply the
16 late payment fees currently on the -- you know,
17 what do you -- what do you -- what revenue you
18 expect from CCI or -- I'm really confused about
19 the third-party attachers at issue after you --
20 after Eversource acquired those poles and after
21 you have sorted out who is who. At the end of
22 the process, now the attachers with CCI, are they
23 now your attachers -- or Eversource's attachers?

1 A. (Letourneau) That is correct.

2 Q. So, currently, do you have in place anything that
3 allows you to recover the late payment fees with
4 the attachers; and then, for the months that we
5 talked about that you were going through the
6 transition for CCI -- clearly, your Bates Page
7 55, Part E, the answer there suggests that --
8 that is part of the Pole Attachment Agreement, so
9 I'm trying to understand the differences between
10 the third-party attachers and CCI. So can you
11 please go back to what was shared and give me a
12 more clear sense of what's going on?

13 A. (Letourneau) Absolutely. So the Company's
14 sundry billing system was modified in a way that
15 resulted in late fees not being automatically
16 charged, and it is a time-consuming manual effort
17 to charge the late fee now, so we do have a
18 mechanism in order to capture the late fees.
19 It's just not a streamlined process.

20 Q. Are you saying that you don't have that in place
21 even going forward, after the acquisition has all
22 been completed?

23 A. (Letourneau) It would be a manual effort,

1 correct.

2 Q. Okay. Again, going back to some of the
3 questioning from the DOE. Any revenue that you
4 receive from the late payment -- the late fee,
5 that is going to lead to more revenue being
6 reflected, correct?

7 A. (Chen) Subject to check with our accounting, but
8 my understanding is that that is a correct
9 statement.

10 Q. Okay. Has the Company separately calculated what
11 those late payment fees would be? And I'm going
12 back all the way to also -- for the -- the
13 attachment fee bills that were sent to CCI, as
14 discussed in Part E of the response at Bates page
15 55, Exhibit 1. It's a general question, but I
16 want you to capture everything, so that's --
17 that's why I'm jumping on this a little bit more,
18 but do you know what -- what the late payment
19 fees should be at this point?

20 A. (Chen) Not to my knowledge. I think because
21 that's a manual process, as noted, so I believe
22 that would take a lot of time and effort to do --
23 to go back and calculate what the late fees would

1 have been to accurately account for it.

2 Q. And you said it will take a lot of time. Can you
3 give me a sense of how much time?

4 A. (Letourneau) Sorry about the delay. At this
5 time, it would be hard to formulate how much
6 exact time would be needed to -- to get an answer
7 for what the late fee -- late fee payments would
8 be.

9 Q. As for your ability to capture that the next time
10 around, meaning that the vendor rates are reset,
11 do you have confidence that you'll have that
12 dealt with? I mean, I'm really talking about
13 whether you can do it in a month, or can you do
14 it -- or do you need -- enough time that that's
15 really something that needs to be addressed the
16 next adjustment in the PPAM rate?

17 A. (Letourneau) I think after cleaning up the --
18 it's my understanding that after cleaning up the
19 CCI data and moving forward into 2024, it's an
20 avenue that we can certainly approach.

21 Q. Okay. On the \$18,000 question -- that was, I
22 think, the fourth issue that DOE had raised. Can
23 you -- can you clarify whether that was part of

1 the agreement somehow or -- you know, is it -- is
2 DOE correct in stating that that was -- that was
3 not part of the agreement, so I'm not -- I just
4 want you to respond to my clarity here.

5 A. (Chen) So I can try to -- to start, and if
6 anyone wants to supplement. So the \$18,000, my
7 understanding is those are the actual incremental
8 on NEM incurred post-CCI closing to handle and
9 coordinate the transfer of third-party attacher
10 information and records taken over from CCI.

11 So my understanding, as part of the
12 CCI transaction and closing, the intention for
13 PPAM is to recover anything that would -- would
14 have been incremental to the Company. So that's
15 why we believe this is an appropriate expense
16 item to be recovered in the PPAM mechanism.

17 And just to add -- I know -- so, in
18 other words, if the CCI transaction did not
19 happen, the Company would not have incurred these
20 costs, because these are incremental O&M costs
21 post-CCI transaction.

22 Q. If you go to Exhibit 2, Bates page 3, and Point
23 No. 5 -- and I'm going to read it, the latter

1 part of it. It says: The DOE does not consider
2 this to be an expense that is imputed by any of
3 the four PPAM expense categories, enumerated
4 above in this statement as Items A through D.
5 Specifically, this expense is not a pole
6 replacement O&M transfer cost, as that cost
7 category relates specifically to transfer of
8 conductors to newly installed poles, nor should
9 this expense be included as a component in pole
10 attachment revenue as the category specifically
11 includes revenues related to pole attachments and
12 makes no reference to netting up costs necessary
13 to bill pole attachers.

14 So I just want you -- I'm giving you an
15 opportunity to respond and say why if -- if this
16 expense is not part of pole replacement O&M
17 transfer costs, why should it be recovered
18 through this mechanism, and why shouldn't it be
19 recovered through, you know -- generally, we have
20 rate cases where we talk about stuff like that,
21 so I'm just trying to understand that aspect.

22 MR. WIESNER: Mr. Chairman, I suggest
23 that this is primarily a legal question, and I

1 think questioning of our fact witnesses would be
2 more appropriate if it focused on what types of
3 expenses these are, how much, rather than whether
4 they fit within a category within the tariff as
5 approved by the Commission.

6 CSMR. CHATTOPADHYAY: So do you have
7 any legal opinion on this?

8 MR. WIESNER: I mean, our -- our
9 opinion is that a very narrow reading of the
10 tariff provisions, which seems to be what the
11 Department is engaging in, might lead one to
12 conclude that these should not be covered.

13 We believe that -- a somewhat broader
14 interpretation of the language, focusing on the
15 incremental nature of the pole attachment
16 revenues, in particular, is the appropriate way
17 to look at this.

18 And, in fact, as the witnesses have
19 testified, it would not have been possible for
20 the Company to obtain the revenues obtained, in
21 particular, from the third-party attachers, other
22 than CCI, without this additional work being done
23 with the associated administrative costs. And

1 that's before we get to the question of
2 whether -- you know, what it would have taken to
3 assess late fees. And, you know, we'll get to
4 that on redirect, I suspect.

5 But I think there is a difference of
6 opinion between the parties here, but I -- I tend
7 to think that it's not a topic that should be the
8 subject of extensive questioning of the fact
9 witnesses.

10 CMSR. CHATTOPADHYAY: Thank you for
11 the clarification, but I think the witnesses can
12 certainly tell me whether -- how much that
13 \$18,000 would impact the rates.

14 BY CMSR. CHATTOPADHYAY:

15 Q. Does it materially change the rates?

16 A. (Chen) Can I take a moment just to --

17 Q. Absolutely.

18 A. -- see if I can come to...

19 So just quickly on the fly, just
20 trying to be responsive to your question,
21 Commissioner. So if we were to remove that
22 \$18,000 cost, as included in our attachment, it
23 would not change the -- the average PPAM rate as

1 proposed.

2 Q. Thank you for that clarification.

3 Last question. You mentioned Account
4 450 at some point, and that's where the revenue
5 is tracked. And you said, if there were late
6 payment fees included, they will appear there.
7 That's what I understood. That's a correct
8 understanding?

9 A. (Chen) That's my understanding, subject to check
10 with our accounting.

11 Q. So, but -- but it's also true right now that
12 Eversource hasn't attempted to calculate any late
13 payment fees or even recover them, at least for
14 this pole attachment issue that is reflected in
15 Account 450, right?

16 A. (Chen) That is a correct statement. Due to the
17 system constraint that we described earlier, yes.

18 CMSR. CHATTOPADHYAY: Okay. Thank
19 you. That's all I have.

20 CHAIRMAN GOLDNER: Okay. Just a
21 couple of topics for me. First, I'll say that
22 "subject to check" is an artifact of a bygone era
23 of the Commission, and "subject to check" will

1 become a record request in the future. Today,
2 we'll move along, but in the future, "subject to
3 check" will be a record request, just so the
4 witnesses are aware.

5 Okay. One of the views that we heard
6 today relative to the late fees is that the
7 Company made a business decision for -- for its
8 own reasons not to collect the late fees. The
9 Department's position, I think, is that the
10 ratepayers are entitled to collect the late fees.
11 And so the question then becomes, what's the
12 correct amount that the Company -- that the
13 ratepayers are entitled to, given the business
14 decision that the Company made?

15 What I think I heard from the Company
16 is that the quantification from the Department,
17 \$168,750 in the late fees from CCI, \$76,777 from
18 the third-party attachers, that the Company has
19 no different quantification of those late fees.

20 So, from a Commission point of view,
21 if the Commission sides with the Department, and
22 the burden of proof being on the Company, I'm not
23 sure how the Commission can -- if the Commission

1 agrees with the Department, can rule differently
2 from the Department's exact quantification.

3 And so, Attorney Wiesner, I have mixed
4 legal and fact here, so I want to give you the
5 opportunity to respond first, and then we can
6 perhaps return to the fact witnesses.

7 MR. WIESNER: Well, I mean, there's a
8 fundamental question about whether it's
9 appropriate to impute late fees to the PPAM
10 revenue requirement in this instance, where
11 the -- where -- and where -- where the customers
12 have been credited with the full amount of the
13 pole attachment revenues at the time they were
14 billed, including those billed in December of
15 2023 that were not even payable until January of
16 2024.

17 So I think at the very least, those
18 late fees -- if any late fees were to be imputed
19 -- and our view is they should not be, for
20 multiple reasons. If any of them were to be
21 imputed, it should not include those third-party
22 attachers billed by the Company in December,
23 because there would have been no opportunity to

1 assess a late fee. And -- I won't go into the
2 business decision or not. You know, we've --
3 we've testified as to the reasons why it was not
4 done.

5 But there would be no opportunity, in
6 our view, for those late fees, imputed or actual,
7 if they become billed, to be credited to the 2023
8 revenue requirement that is the subject of
9 today's PPAM filing.

10 In terms of the -- in terms of the
11 calculation of the late fees that might have been
12 assessed to CCI during 2023, we can do that
13 calculation. I just don't think that we have
14 done it and have that ready at this moment. We
15 possibly could take a break and run some math and
16 come back and provide that answer.

17 Again, our overriding view is it's not
18 appropriate to impute late fees where they were
19 not, in fact, assessed, given that customers were
20 credited in full with the amounts billed as of
21 the time of the billing.

22 CHAIRMAN GOLDNER: Understand. And
23 I'm just trying -- because the Commission is

1 being asked for a ruling quickly on this one,
2 I'm -- I just want to give the Company an
3 opportunity to review the quantification of the
4 late fees before the Department puts their
5 witness on the stand. Although, I suppose,
6 Attorney Wiesner, you could also perhaps address
7 it in cross, but I'd prefer to do it while the
8 fact witnesses are on the stand.

9 So let's do that. Let's take a
10 15-minute break. When we come back, the
11 Commission can wrap up with questions. We could
12 turn to redirect, and we can look at the late
13 payment fee calculation from the point of view of
14 the Company.

15 Would 15 minutes be sufficient,
16 Attorney Wiesner, or does the Company need more
17 time?

18 MR. WIESNER: I'm going to say 15
19 minutes should be sufficient.

20 CHAIRMAN GOLDNER: Okay. Let's return
21 at 20 of. Off the record.

22 (Recess taken.)

23 CHAIRMAN GOLDNER: Back on the record.

1 And return to the question asked of the Company
2 relative to late fees. Attorney Wiesner, would
3 you like the lead, or would -- will the witnesses
4 be answering this question?

5 MR. WIESNER: So I will just preface
6 this by saying -- and I suggested this
7 previously -- that the PPAM -- the filing that
8 we're talking about that had a rate adjustment
9 for October 1st is really confined to what
10 happened in 2023, with a calendar year and
11 lookback. And so -- you know, again, we have
12 arguments and evidence, some of which you heard
13 already, as to why no late fees should be imputed
14 to reduce the revenue requirement for 2023.

15 But if we're going to look at those
16 amounts that were billed, paid late during 2023
17 by X number of months, first of all, that would
18 not include -- and in the further testimony you
19 heard earlier, that would not include amounts
20 that the Company billed to third-party attachers
21 in December, because with a 30-day payment due
22 date, that was not due until January 2024, so it
23 shouldn't be imputed to 2023 in our view.

1 So I think what we're talking about is
2 the CCI bills, because CCI received three bills
3 from the Company during 2023. And I don't
4 believe any of them was paid within 30 days, but
5 I'll invite our witnesses to address the
6 calculation that we were able to do during the
7 break as to what the amount of late fees would
8 have been if billed to CCI based on its late
9 payments during that year.

10 CHAIRMAN GOLDNER: Okay. Thank you,
11 Attorney Wiesner.

12 THE WITNESS: (Letourneau) Thank you.
13 For the bill dated 6/15/2023, the bill amount was
14 for \$1,250,000. The payment due date assumed was
15 July 15th, 2023. The actual payment date was
16 October 17th, 2023. We had it calculated as
17 three months past due, with a 1.5 percent late
18 payment fee per month. The Eversource imputed
19 late fees would have been \$58,750.

20 So the next bill date was September
21 19th, 2023, for the amount of \$1,250,000. The
22 assumed payment due date would have been October
23 19th, 2023. The actual payment date was March

1 7th of 2024, so for -- it would have been three
2 months in the year of 2023. The late payment fee
3 percent per month, at 1.5 percent, Eversource has
4 it calculated at \$50,000.

5 The last CCI bill --

6 BY CHAIRMAN GOLDNER:

7 Q. Sorry. Let me pause you just there real quick.
8 I thought both amounts were the same and both
9 late months were the same. It was three months
10 in the case of both, so wouldn't it be the
11 same --

12 A. (Letourneau) That's correct. I apologize. I
13 ran quick over my notes. But, yes, 58,750 for
14 both line items so far. That's correct.

15 Q. Thank you.

16 A. (Letourneau) Thank you for catching that.

17 The last bill, as of November 28th,
18 went to CCI from Eversource for the bill amount
19 of \$1,250,000. The assumed payment due date
20 would have been December 20 -- December 28th,
21 2023, and the actual payment date was March 28th
22 of 2024. We are assuming a one-month late
23 payment fee for the calendar year of 2023, at a

1 late payment fee percent per month at 1.5
2 percent. The imputed late fees would have been
3 \$19,375. The total that Eversource calculated,
4 \$128,125.

5 Q. And that compares to the DOE analysis of
6 \$168,750; is that the right comparable?

7 A. (Letourneau) That is correct.

8 Q. So we're different by something like \$40,000?

9 A. (Letourneau) That's correct.

10 Q. Okay. Thank you. I wanted to quantify that
11 before the DOE went to the stand, so we could
12 understand the Company's calculation if it -- if
13 it -- you know, for that particular category.

14 CHAIRMAN GOLDNER: Okay. So Attorney
15 Wiesner, just to repeat back, just to make sure I
16 understand the Company's position, so the late
17 payment fees from third-party attachers, the
18 Department suggests that that number should be
19 \$76,777. The Company believes that number should
20 be zero.

21 And then, for the late payment fees
22 from CCI, the Department calculates \$168,750, and
23 the Company calculates \$128 -- \$128,750; is that

1 right?

2 THE WITNESS: (Letourneau) The
3 Company --

4 BY CHAIRMAN GOLDNER:

5 Q. Or -125, yeah. I'm sorry. I will say that
6 again. 128,125, is that right, in total?

7 A. (Letourneau) I will add it very quickly, because
8 I believe my numbers are --

9 CMSR. CHATTOPADHYAY: I thought --
10 sorry, I heard \$128,125.

11 BY CHAIRMAN GOLDNER:

12 Q. Okay. Thank you. We'll check that.

13 And Excel tells me it's \$136,875.
14 That's 58,750, plus 58,750, plus 19,375, I'm
15 showing 136,875. I just want to give you an
16 opportunity to check.

17 A. (Letourneau) Thank you. I'm just checking right
18 now.

19 Q. Yeah, take your time.

20 A. (Letourneau) Thank you for allowing the brief
21 pause. I have a total of 136 -- 136,875.

22 Q. Thank you. Perfect.

23 CHAIRMAN GOLDNER: Okay. Anything

1 else, Commissioner Chattopadhyay, before we move
2 to redirect?

3 CMSR. CHATTOPADHYAY: No, I don't.

4 CHAIRMAN GOLDNER: Okay. Thank you.

5 Attorney Wiesner, we'll move to redirect.

6 REDIRECT EXAMINATION

7 BY MR. WIESNER:

8 Q. So I'll -- before I lose the train of thought,
9 I'll return to Mr. Letourneau and ask about the
10 third bill that was issued to CCI during 2023.
11 That bill was issued on November 28th and would
12 have been due 30 days later on December 28th of
13 2023; is that correct?

14 A. (Letourneau) That's correct.

15 Q. And as previously testified, the Company is not
16 set up to assess late fees to third-party
17 attachers, including CCI and its billing system,
18 and has not done it annually.

19 If the Company -- if the Company had
20 been in a position to charge late fees to
21 third-party attachers with past-due amounts, is
22 there any realistic chance that that late fee
23 would have been assessed within the three days

1 remaining at the end of December 2023 between the
2 30-day due date of the third CCI bill on the 28th
3 and the year end on the 31st?

4 A. (Letourneau) It would be unreasonable to believe
5 that that bill would be able to -- the late fee
6 charges would be able to be billed in those three
7 calendar days.

8 Q. In fact, it would have been more likely that a
9 follow-up bill of some kind would have been sent
10 in January at the earliest and would have
11 included that late fee?

12 A. (Letourneau) That is correct.

13 Q. So, per the Company's accrual accounting methods,
14 to your understanding, that would not have been
15 booked in 2023 in any event?

16 A. (Letourneau) That is correct.

17 Q. So then the \$19,375 that would have been charged
18 as a late fee at some point to CCI, based on that
19 third bill of the year, most likely would not
20 have been booked until 2023 -- 2024, rather,
21 excuse me?

22 A. (Letourneau) That is correct.

23 Q. Okay. Thank you. And I want to take us back to

1 Bates 32, I think it is, in Exhibit 1. And the
2 reason I want to look at this is because, what I
3 see here is a perfect example of how the
4 Company's accrual accounting works.

5 So the PPAM was credited with the
6 amounts that were billed to CCI on three separate
7 occasions, with the dates that we just
8 referenced, and the third-party attachers for the
9 billing that was done in December of 2023, and so
10 customers, effectively, on the PPAM revenue
11 requirement are being credited with those full
12 amounts billed as of the time they were billed;
13 is that correct?

14 A. (Letourneau) That's correct.

15 Q. And as noted, that includes the third-party
16 attachers who were billed in December, accounting
17 for the delay that you previously testified, due
18 to the complexities of the transition from CCI to
19 Eversource billing of a diverse group of
20 third-party attachers across the state?

21 A. (Letourneau) That is correct.

22 Q. And so, is it fair to say -- I think I will
23 direct this question to Ms. Chen. Is it fair to

1 say that from a customer perspective, they
2 received all the credit for the pole attachment
3 revenues that they were entitled to, as of the
4 time of the bills, notwithstanding if, or when,
5 the third-party attachers actually paid
6 Eversource?

7 A. (Chen) That's correct.

8 Q. So, in fact, Eversource is taking the collection
9 risk, where the customers have been credited with
10 the full amount of the pole attachment revenue?

11 A. (Chen) That's correct.

12 Q. And is it also correct to say that, if the
13 Company had assessed late fees, billed the
14 third-party attachers, including CCI, and had
15 received payment attributable to those late
16 payment fees, that it would have been credited to
17 the PPAM revenue requirement and, accordingly, to
18 the benefit of customers?

19 A. (Chen) That is fair to say.

20 Q. And I think you'd previously referenced Account
21 450. Is that the account that would apply to
22 this specific issue of pole attachment revenues,
23 or is that a more general account for late

1 charges assessed to the Company's distribution
2 customers?

3 A. (Chen) Yeah, thank you for bringing that up.

4 So it is more of a general account
5 that would then fall into -- like, the late fees
6 would fall under.

7 Q. And back to Bates 32. What we don't see here is
8 the amounts that were billed by CCI to its
9 third-party attachers prior to the closing
10 effective date on May 1st; is that correct?

11 A. (Letourneau) That's correct.

12 Q. And that's because CCI was billing its
13 third-party attachers, I believe, in January; is
14 that -- is that right?

15 A. (Letourneau) You are correct in saying that.

16 Q. Okay. So they'd already billed their attachers,
17 either for the full six months through June 30,
18 or, in some cases, as I understand it, primarily
19 smaller attachers with lower billed amounts, some
20 of them were being billed for the full 12 months
21 through the end of 2023?

22 A. (Letourneau) That's correct. It varies.

23 Q. And so the amount that -- I'm trying to get it

1 right. The \$486,000-plus that we had previously
2 referenced that has been paid over to Eversource
3 by CCI as of -- and there were multiple payments,
4 but I think most of it was in 2024, and either in
5 January or February of 2024, almost all of that
6 amount was collected and has been paid over to
7 Eversource; is that correct?

8 A. (Letourneau) That's correct.

9 Q. And that is, effectively, as I understand it --
10 and hopefully, we can confirm this. That is a
11 prorated amount of what CCI had billed its
12 third-party attachers, prorated both for the
13 number of months, but also prorated to that
14 portion of the third-party attachment fees that
15 are attributable to poles which are located in
16 the Eversource service territory?

17 A. (Letourneau) That's correct.

18 Q. So I believe Ms. Chen testified previously that
19 it would be possible to effectively move that
20 amount of the prorated CCI bill, third-party
21 attachment fees, into 2023 and credited -- credit
22 customers for that amount, even though, in
23 actuality, the Company did not accrue that in

1 2023. It did not receive the payment until 2024;
2 is that -- do I have that right?

3 A. (Chen) You are correct. And that is going back
4 to the way that we recognize all those -- all the
5 costs and revenue on the accrual accounting
6 basis, and that's why we did not include that in
7 the initial filings.

8 Q. Right. So because the Company was not billing
9 it, it was not accrued to 2023 even though it
10 relates to periods in 2023?

11 A. (Chen) Correct.

12 Q. But it would be possible, through some sort of
13 pro forma adjustment, to move that money into
14 2023 and apply it to the PPAM revenue
15 requirement?

16 A. (Chen) That is possible. And we can definitely
17 implement that if directed by the Commission.

18 Q. And the benefit of doing that, I take it, is that
19 -- you know, we're sitting here in 2024. We know
20 what actually happened. And even though it
21 didn't happen in 2023, and, therefore, it doesn't
22 strictly flow through the Company's accounting or
23 through the PPAM rate mechanism, that would --

1 that would have the benefit of not charging
2 customers an amount which is ultimately
3 attributable to 2023 and then reconciling it
4 later; is that -- is that an appropriate way to
5 look at this?

6 A. (Chen) Yes.

7 Q. Okay. Thank you. And, you know, there was
8 some discussion earlier about the Company not
9 charging carrying charges on the costs that it
10 incurred for pole -- pole replacement and
11 inspection during 2023; is that -- do I have that
12 right?

13 A. (Chen) Yes.

14 Q. And so, one way to look at the PPAM's very
15 simplified rate mechanism, unlike some other
16 reconciling rate mechanisms, it doesn't look
17 ahead and project what costs and expenses will
18 be. It's limited to a calendar year lookback to
19 2023; is that -- is that right?

20 A. (Chen) That's correct.

21 Q. And -- and with no sort of working capital or
22 time value of money adjustment on the cost side,
23 at least until it goes into rates and is subject

1 to the reconciliation at the prime rate?

2 A. (Chen) Correct.

3 Q. And so is it -- is it fair to say that one could
4 consider there to be a mismatch if late fees,
5 which were never assessed by the Company to
6 third-party attachers for 2023 or in 2024, for
7 that matter, were imputed into the revenue
8 requirement where there was no imputation of any
9 carrying charges for the costs incurred by the
10 Company, you know, regardless of when those costs
11 were incurred during 2023?

12 A. (Chen) Yes.

13 Q. And, once again, from a customer perspective, you
14 know, one could look at this and say the customer
15 should be indifferent, because the customer is
16 credited with the full amount that had been
17 billed by the Company to third-party attachers.
18 And with a pro forma adjustment for the CCI
19 billings, the customers would be credited with
20 the full amount -- prorated amount that was
21 ultimately billed by CCI last year and ultimately
22 collected by the Company this year but
23 attributable to periods during 2023. Customers

1 would get the full benefit of that, but without
2 the added benefit of late fees?

3 A. (Chen) Correct.

4 Q. And late fees, at 1.5 percent per month, which
5 is, you know, roughly equivalent -- well,
6 equivalent to 18 percent annual, is it fair to
7 think of that as well in excess of the time
8 value of money?

9 A. (Chen) Yes.

10 Q. For example, it's considerably more than the
11 prime rate that applies to reconciliation
12 balances under the PPAM rate mechanism?

13 A. (Chen) Yes.

14 Q. And, in fact, it's higher as well than the
15 Company's weighted average cost of
16 capital?

17 A. (Chen) That's correct.

18 MR. WIESNER: I believe that's all I
19 have. Thank you.

20 CHAIRMAN GOLDNER: Okay. Thank you.
21 The Eversource witnesses are excused. Thank you
22 for your time today.

23 And we'll invite the DOE's witness,

1 Mr. Eckberg, to the stand.

2 Okay. Mr. Eckberg, could you please
3 state your full name for the record.

4 THE WITNESS: My name is Stephen R.
5 Eckberg.

6 CHAIRMAN GOLDNER: And can you raise
7 your right hand.

8 (Whereupon, STEPHEN R. ECKBERG, was
9 duly sworn by Chairman Goldner.)

10 CHAIRMAN GOLDNER: Attorney Ladwig,
11 the witness is ready for direct.

12 MS. LADWIG: Thank you, Mr. Chairman.

13 DIRECT EXAMINATION

14 BY MS. LADWIG:

15 Q. Could you please state your name and position
16 with the Department?

17 A. (Eckberg) Yes. My name is Stephen Eckberg, and
18 I'm an analyst with the Regulatory Support
19 Division of New Hampshire Department of Energy.

20 Q. And did you prepare the technical statement filed
21 in this docket on September 6th, 2024, and marked
22 as Exhibit 2?

23 A. (Eckberg) Yes, I did.

1 Q. Do you have any corrections you would like to
2 make to your technical statement at this time?

3 A. (Eckberg) I have no corrections that need to be
4 made, though I do suspect that, in the course of
5 the upcoming direct and cross-examination, there
6 may be some -- changes to some of the numbers
7 we've been discussing here this morning.

8 Q. Perfect. Thank you. So to dive right into those
9 recommended adjustments, I want to go to Exhibit
10 2, Bates 4.

11 A. (Eckberg) Give me one moment. Okay. I'm there.

12 Q. So that is -- that appears to be where those
13 recommended adjustments are summarized, and I
14 want to address each adjustment, starting with
15 Adjustments 1 and 2, which both relate to late
16 payment fees.

17 Could you please summarize those two
18 adjustments.

19 A. (Eckberg) Certainly. My recommended Adjustment
20 No. 1 pertains to late payment fees, the value of
21 which I have calculated using a fairly simple
22 calculation approach related to the three bills
23 that Eversource sent to CCI during 2023, and the

1 total amount that I have included as my
2 recommended adjustment, as seen here in this
3 table, is \$168,750.

4 The second recommended adjustment
5 pertains to late payment fees from the
6 third-party pole attachers. Those are the
7 non-CCI pole attachers. In response to
8 discovery, Eversource provided a table to us of
9 the -- I believe the number is 40 separate pole
10 attachers, and the invoices to each of those that
11 were sent out in December of 2023. And I made an
12 estimated calculation of late payment amounts
13 relative to those payments, which is shown here
14 in this table, of \$76,777.

15 Q. And could you just explain how -- how you
16 calculated those amounts?

17 A. (Eckberg) Sure, I'd be glad to. I'm able to
18 provide a visual aid, if that would be helpful.
19 This is a simple little spreadsheet that is not
20 an exhibit. I'm seeing the Chairman nodding,
21 yes, that that might be a helpful thing to walk
22 through.

23 CHAIRMAN GOLDNER: Any objections from

1 the Company?

2 MR. WIESNER: No objections.

3 CHAIRMAN GOLDNER: Thank you.

4 THE WITNESS: (Eckberg) And being
5 mindful that this is not an exhibit, but if -- I
6 have a copy. Thank you very much.

7 CHAIRMAN GOLDNER: You want to, I
8 think, submit it after, post-hearing, as maybe --
9 we can call it Exhibit 3, I suppose.

10 MS. LADWIG: That sounds good. Thank
11 you.

12 THE WITNESS: (Eckberg) So on this
13 sheet, which I think most everyone has a copy of
14 at the moment, in the upper portion are three
15 rows which show the three bills which were sent
16 from Eversource to CCI. The Company witnesses
17 did share all of these dates, I believe, the bill
18 date and the due dates, in the course of
19 discussions this morning.

20 The three bills were sent on the 15th
21 of June, the 19th of September, and the 28th of
22 November. And so to each of those bill dates, I
23 added 30 days, which then produces the due date,

1 which you see in -- I haven't labeled the
2 columns. This was sort of a work paper I used
3 for myself. And then I recorded the payment
4 date, which was provided by the Company in
5 response to discovery, calculated -- or Excel
6 calculated for me the number of days overdue.
7 That's simply a calculation of the number of days
8 that have passed between the due date and the
9 payment date.

10 So 92 days passed between the due date
11 for the first bill of July 15th and when payment
12 was received on the 17th of October in 2023.
13 That 92 days, I've shortened or rounded to three
14 months overdue. And then applying the monthly
15 interest rate of 1.5 percent, which was specified
16 in the agreement between CCI and Eversource, the
17 Pole Transfer Agreement, and I've applied that in
18 a very simple calculation methodology, not as a
19 compound interest. So I just simply multiplied
20 three months times 1.5 percent, times the bill
21 amount of 1.25 million, to arrive at my
22 calculation of the overdue penalty amount -- or
23 late fee amount, it could be referred to as that

1 -- \$56,250.

2 And I believe a few moments ago we
3 heard Company witnesses performed a similar
4 calculation. The number they arrived at was --
5 if my notes are correct -- \$58,750, which is a
6 little greater than the number I calculated. I
7 presume that's probably because their methodology
8 may have used a -- a compounding interest. So
9 after the first month of interest, they're
10 applying interest on the first month's late fee.
11 So a minor difference there, but I -- I'm
12 guessing that that's a minor difference in our
13 methodologies.

14 So I repeated this calculation for the
15 other two bills, the September bill and the
16 November bill, and each one of those came up with
17 a similar result.

18 The total of those three CCI late
19 payment fee calculations, as you'll see on my
20 calculation spreadsheet here, is \$168,750, which
21 matches the amount in my table seen on Exhibit 2,
22 Bates page 4.

23 In the lower portion of my calculation

1 spreadsheet here, you'll see the calculation that
2 relates to the third-party pole attachers. And
3 the details related to those are that the bill
4 date the bills were sent out, on the 15th of
5 December, again, according to information
6 provided by the Company. That means adding 30
7 days to that, the bills would be due the 14th of
8 December [sic], and the number of days up through
9 the 30th of September 2024, that's the month
10 we're in now -- obviously, this is simply a rough
11 guess -- a rough calculation.

12 And the bill amount that I have
13 entered in that column, \$639,808, that number
14 comes from information provided by Eversource in
15 response to discovery. That is a portion of the
16 amount which is shown in total in Exhibit 1,
17 Bates Page 32, on Line 1, Pole Attachment
18 Revenue.

19 The Company said in December of 2023,
20 they sent out bills to third-party pole attachers
21 in the total amount of \$958,000, but as of the
22 date of the data response in late August,
23 \$639,808 of that total amount, 958,000, remained

1 unpaid, uncollected by the third-party pole
2 attachers.

3 So I simply used the date of the end
4 of September as an optimistic date when those
5 payments would all be realized. I calculated
6 eight months of late fee. And that total is the
7 \$76,777, which is seen here on the calculation
8 spreadsheet and also in the table in Exhibit 2,
9 Bates page 4, of my technical statement.

10 BY MS. LADWIG:

11 Q. Thank you for walking us through that. Do you
12 have any updates to those amounts today?

13 A. (Eckberg) Well, I don't have any changes to the
14 calculations per se in terms of, you know,
15 changes to the methodology.

16 However, I think we've heard extensive
17 testimony from the Company this morning about
18 how, in Exhibit 1, at Page 32 -- Bates page 32,
19 which shows the pole attachment revenue, the
20 Company has used an accrual approach, you could
21 say, to providing or giving credit to ratepayers
22 of the amounts that were billed to CCI. We see
23 there on Line 1, the \$1.25 million, three

1 instances of that, for June, September, and
2 November. And then we also see the \$958,000,
3 which are the third-party pole attachers.

4 And so, as the Company testified --
5 testified this morning, not all of those amounts
6 were actually received in payment during 2023.
7 Nonetheless, the Company has recorded those
8 amounts here in -- to give ratepayers the full
9 benefits of those amounts.

10 And so in the -- in the process of,
11 you know, assessing the appropriateness of
12 including late fees on these amounts that were
13 billed to CCI and the pole attachers, I do think
14 it becomes a bit more complicated to determine
15 what might be an appropriate amount of late fees
16 that should be imputed and included to the
17 benefit of ratepayers.

18 And I would suggest that my chart on
19 Exhibit 2, Bates page 4, which shows, in my
20 recommended adjustment number, \$168,750 -- I
21 think that it may be appropriate -- more
22 appropriate to take into account the point that
23 the Company has made today that, because those

1 payments were not actually received until March
2 of 2024, while we certainly appreciate -- and
3 ratepayers appreciate -- the benefit of the
4 Company providing the full \$1.25 million, I think
5 it would probably be -- the most appropriate way
6 to impute and include late fees would be to
7 include only the late fee related to the first
8 bill, which was issued June 15th, a bill due date
9 of July 15th, and a payment received the 15th --
10 excuse me -- the 17th of October 2023, because
11 that bill was actually paid in 2023.

12 And it's my position -- the DOE's
13 position that it is appropriate that the Company
14 should have applied late fees to that bill,
15 notwithstanding their -- the testimony that that
16 would have been somehow burdensome or required
17 extensive work to include those late fees.

18 The contract with CCI provides for
19 late fees, and the ratepayers deserve the benefit
20 of those late fees to be included. So -- the
21 adjustment, you might say, would be to change the
22 \$168,750 for late payment fees related to CCI to
23 only \$56,250 here in the 2023 PPAM or -- I guess

1 we should call this the 2024 PPAM, which relates
2 to expenses and revenues in the 2023 calendar
3 year, because that's when those late charges
4 would have been applied and collected.

5 And it seems reasonable to remove,
6 then, the other two amounts of \$56,250. However,
7 the Department would certainly like to reserve
8 our right to raise those issues of those late
9 fees in next year's PPAM filing, which would
10 apply to 2024, amounts received and expenses
11 incurred related to the CCI poles.

12 Has that been reasonably clear, or is
13 that a totally confusing proposed adjustment? Or
14 at least, what's your opinion? Do you have
15 additional questions about that?

16 Q. I was going to say, I'm probably not the one to
17 ask, since I have been a little immersed in this,
18 so I would let the Commissioners ask if they have
19 some follow-up question to clarify.

20 And I will move on to asking -- so we
21 talked about the separation between late payment
22 fees attributable to CCI and late payment fees
23 that would be attributable to other third-party

1 attachers.

2 Do you think there should be any
3 difference in how those two categories of late
4 payment fees should be treated?

5 A. (Eckberg) Well, I have mentioned -- I have had
6 the benefit of seeing and reviewing the agreement
7 between CCI and Eversource, and so I'm confident
8 that -- that that contract specified 1.5 percent
9 per month as a late fee applicable to amounts
10 billable to CCI.

11 I have not reviewed the contracts
12 applicable to third-party pole attachers between
13 Eversource and those other attachers. I'm not
14 sure whether there's a standard contract or
15 whether there are preexisting arrangements
16 between Eversource and -- or excuse me --
17 preexisting contracts between CCI and each of
18 those attachers which have been inherited, so to
19 speak, by Eversource as a result of this
20 acquisition transaction.

21 So without the full benefit of
22 reviewing all of those third-party attachment
23 contracts, I have made a simplifying assumption

1 that 1.5 percent per month, the same late fee
2 approach would be applicable to the third-party
3 attachers.

4 But I would -- I should also say, at
5 this point, that, given the testimony that we
6 have heard here this morning regarding how --
7 since these bills were sent from Eversource to
8 the third-party attachers in December of 2023,
9 and, therefore, the billing due dates would have
10 been in January of 2024, to be consistent with my
11 suggested adjustment a few moments ago regarding
12 the CCI late fees, it may be appropriate to defer
13 the assessment of late fees on the third-party
14 attachers until next year's PPAM, when the
15 details of when all of those bills were paid and
16 a full, more detailed calculation can be
17 performed.

18 So it would be, I think, not
19 unreasonable to adjust my recommended Adjustment
20 No. 2 from \$76,777, down to zero for the purposes
21 of this year's PPAM, with, again, the Department
22 reserving its right to raise this issue and make
23 similar arguments regarding late payment fees

1 next year.

2 CHAIRMAN GOLDNER: I generally don't
3 interrupt Attorney Ladwig, but just, given the
4 rate case, would there be a PPAM hearing next
5 year if the rate case moves forward according to
6 the current construction?

7 MS. LADWIG: So that is something that
8 we discussed with Eversource, and they responded
9 in a data request. I don't think it's included
10 here, but I believe the plan would be at least
11 one more year to reconcile costs from the past
12 year's PPAM. I think 2026 one as well. I can't
13 remember the reasoning behind that, so the
14 Company might be better positioned to explain it,
15 but my understanding is -- the idea is all of
16 these components of the PPAM would go into base
17 rates, and there would just be a year or two more
18 to reconcile the outstanding amounts.

19 CHAIRMAN GOLDNER: Attorney Wiesner,
20 is that your understanding?

21 MR. WIESNER: Yes. At the very least
22 because of the rate -- the temporary rate
23 effective date July 1st, we'd be looking at half

1 of this year, 2024, when we come back next year
2 to look at the PPAM. So it sorts of phases out,
3 if you will. And there may even be -- you know,
4 again, some of this depends on what happens in
5 the rate case, but there may be a need for an
6 even -- a final-final PPAM, if you will, to
7 reconcile final amounts.

8 CHAIRMAN GOLDNER: Okay. Thank you.
9 That makes perfect sense.

10 MR. WIESNER: So we will be back here
11 next year talking about this.

12 CHAIRMAN GOLDNER: Okay.

13 MR. WIESNER: Something to look
14 forward to.

15 CHAIRMAN GOLDNER: Okay. That's
16 wonderful.

17 Thank you, Attorney Ladwig. Sorry for
18 the interruption.

19 MS. LADWIG: Of course. I'm glad --
20 glad to offer that clarification.

21 BY MS. LADWIG:

22 Q. So, Mr. Eckberg, we have heard the Company
23 mention this morning Account 450, and how that

1 account contains generally late fee and late
2 charge payments.

3 Is it your understanding, whether in
4 this account or otherwise -- I'm sorry. I should
5 back up.

6 Is it your understanding that the
7 Company's ratepayers are subject to late payment
8 fees?

9 A. (Eckberg) Yes. I think that all of the
10 Company's ratepayers, residential, small
11 commercial, large commercial customers, that's my
12 understanding, that we are all -- I say "we" -- I
13 am an Eversource ratepayer, full disclosure --
14 are all subject to late fees if we don't pay our
15 bills in a timely manner. I'm not familiar with
16 the nuances of those. I'm fortunate to have been
17 able to pay my bills in a timely manner.

18 Q. And just to clarify, even though you're an
19 Eversource customer, your testimony today is not
20 biased by that?

21 A. (Eckberg) I -- I don't believe so, no. I
22 believe it's -- I'm performing my normal job
23 responsibilities here, yes.

1 Q. Thank you. I figured I would just follow up and
2 ask.

3 I want to turn now to the third
4 adjustment you recommend in your technical
5 statement, which applies to the May and June 2023
6 pole attachment revenue from third-party
7 attachers. Could you please summarize that
8 recommended adjustment?

9 A. (Eckberg) Certainly. In reviewing the -- the
10 pole attachment revenues, which we have -- which
11 we see on Bates page 32 of Exhibit 1. Line 1 is
12 where we've been looking at a lot of numbers
13 today. I observed there was no revenue numbers
14 showing in May of 2023, and that caught my
15 attention initially, and I asked the Company
16 about -- during our technical session why that
17 was the case.

18 And -- I guess, I didn't receive, at
19 that moment in time, a response which fully made
20 sense to me, so I took the liberty, you might
21 say, of recommending that customers should
22 realize the benefit of receiving revenue for the
23 months of May and June of 2023, based upon the

1 \$958,000 amount, which is shown in the December
2 column of -- there on Bates page 32. I made the
3 simplifying assumption that the \$958,000, if that
4 pertained to the six-month period of July through
5 December 2023, then I could simply divide that by
6 six to derive a monthly amount and multiply that
7 by two to determine the May and June estimate for
8 the pole attachment revenue for those two months.

9 So that simple calculation resulted in
10 Recommended Adjustment No. 4, which is \$319,217.
11 That's how I derived that number.

12 Q. Thank you. And it's probably worth clarifying,
13 too, in your table, with the recommended
14 adjustment numbers, it looks like it goes, 1, 2,
15 4 and 5. So I want to clarify, 4 should be a 3,
16 and 5 should be a 4?

17 A. (Eckberg) Actually, the 1, 2, 4 and 5 correspond
18 to the numbered paragraphs in my technical
19 statement, and Paragraph No. 3 didn't actually
20 contain an adjustment. It was a discussion of
21 some related issues. And so I believe that
22 Recommended No. -- Adjustment No. 4 is discussed
23 above in numbered Paragraph 4. That's how my

1 system worked there.

2 Q. Thank you for --

3 A. (Eckberg) I had a system. It just might not be
4 the same system others would use.

5 Q. I didn't doubt you had a system.

6 So you reviewed -- you explained how
7 you calculated the amount in your adjustment.

8 Based on what we have learned since
9 your technical statement and what the Company
10 discussed today, do you have any update to that
11 amount?

12 A. (Eckberg) Yes. The Company has testified this
13 morning that the -- that they did not include --
14 they did not originally include May and June
15 third-party pole attachment revenue amounts in
16 their schedule on Bates page 32, because those
17 amounts were billed by CCI in January of 2023 to
18 the third-party pole attachment -- pole
19 attachers, and that there was a fair amount of
20 data analysis work in understanding of those
21 bills, because some of the third-party pole
22 attachment bills that went out in January of
23 2023, I understand, were for a six-month period,

1 and some were for a twelve-month period, so there
2 was some -- there was some significant amount of
3 unraveling that had to happen in order to
4 understand all the details. And the Company
5 provided a number this morning, which I believe
6 the total amount due related to the May and June
7 third-party pole attacher revenues is \$487,000
8 rather than the \$319,217, which I have included
9 here in my Adjustment No. 4.

10 So I believe those two amounts
11 correspond to each other, and that the more
12 accurate number would be the one that the Company
13 has provided today, and which, if I understand
14 correctly, they said they would be willing to
15 move that revenue in their accounting systems,
16 probably as well as included here on the
17 schedule, the \$487,000 as revenue applicable to
18 2023 for May and June pole attachment revenue.
19 That was my understanding of the Company's
20 testimony this morning.

21 Q. And is it your recommendations that the Company
22 do that, essentially that the May and June 2023
23 revenue be included in this year's PPAM?

1 A. (Eckberg) I think that would be most
2 appropriate, though, we have heard some testimony
3 from the Company witnesses this morning about the
4 difference between the accrual accounting, which,
5 you know, has resulted in the amounts shown on
6 Bates page 32, on Line 1, the pole attachment
7 revenues.

8 Again, for example, the CCI amounts of
9 \$1.25 million, three instances of that, those
10 were not all actually received in 2023. Only
11 some of them were. Nonetheless, the Company has
12 included the amounts there.

13 And so, in sort of a corresponding
14 way, it seems appropriate to me to include the
15 \$487,000, as the Company has offered to do, to
16 include that amount, because it does relate to
17 May and June of 2023. So that would be, you
18 could say, an adjustment to my table of
19 adjustments.

20 So that Adjustment No. 4 would
21 increase -- would change from a 319,000 to
22 487,000, and, hopefully, when we get to the end
23 of all this, you'll give me an opportunity to do

1 an adjusted total as well.

2 Q. I think that would probably be helpful for
3 everyone, so I will certainly give you the
4 opportunity.

5 The final -- your final
6 recommendations, which is noted in your tech
7 statement as Recommended Adjustment No. 5, could
8 you please summarize that recommended adjustment?

9 A. (Eckberg) Yes. This number, the \$18,000,
10 originates in -- well, if we could turn back to
11 numbered Paragraph 5, this also originates from
12 the -- the reference is, again, to Bates page 32
13 of Exhibit 2. And on Line 2 there, we see a
14 description, "Pole Attachment Revenue-Related
15 Expenses."

16 I -- the Department inquired during
17 the discovery process about what the details of
18 that \$18,000 were. And as the Company testified
19 this morning, that was related to their
20 incremental costs related to producing bills for
21 the third-party pole attachers.

22 And my understanding -- my
23 interpretation of the parameters of the PPAM do

1 not directly suggest that that amount should be
2 included, as I explained in my technical
3 statement. So I have proposed to, in effect,
4 remove that expense.

5 Q. And maybe, just to address the exact wording as
6 well of the Company's argument about the \$18,000,
7 in Exhibit 2 on Bates 55 -- again, that's what we
8 have been going back to a couple of times, where
9 the Company provided some record request
10 responses. In Response C on that page, the
11 Company's argument is that the reference to
12 incrementally higher pole attachment revenues in
13 Order No. 26,729 permits netting out of any
14 incremental O&M expense amounts incurred post-CCI
15 closing to handle and coordinate the transfer of
16 third-party attacher information and records
17 taken over from CCI.

18 A. (Eckberg) I see that that's the Company's
19 response to Part C of our data request, and I
20 think, in its simplest terms, I disagree with
21 that interpretation and feel that the Company was
22 already producing bills to send to pole
23 attachers. And while this may be an incremental

1 cost to produce some bills, I just don't see the
2 language of the four categories which are
3 authorized expenses to be included in the PPAM to
4 cover that. I don't interpret the word
5 "incremental" to refer to costs of -- of
6 producing the bills.

7 I believe that it's the incremental
8 costs -- I think I quoted the section in my
9 technical statement or elsewhere, but it's the
10 incremental costs, which don't include these
11 bill -- bill production costs. Call it a
12 stricter interpretation of the PPAM language,
13 perhaps. I think I heard that description used
14 earlier today.

15 Q. Thank you. And so maybe it's easiest if I try to
16 summarize and make sure I capture what you said
17 about the four recommendations just now and have
18 you elaborate on whether that's correct.

19 So, as to your four recommendations,
20 for your first one, you recommended updating the
21 CCI late payment fees to only include late
22 payment fees associated with the first CCI bill
23 with the rate calculated by the Company, because

1 the other bills weren't paid until 2024.

2 For your second recommendation, you
3 would recommend removing that number completely
4 from this year's filing and addressing it in next
5 year's filing.

6 For your third, you would update it to
7 the number that the Company provided this morning
8 of about 487,000.

9 And for your fourth, there is no
10 change; you still recommend removing the 18,000?

11 A. (Eckberg) You did that very succinctly, much
12 more quickly than I did. Thank you.

13 Yes, that accurately captures the
14 discussion, yes.

15 Q. Do you have anything more to add on those
16 recommendations?

17 A. (Eckberg) I would like to certainly, again,
18 mention that, you know, the Department would like
19 to reserve our rights to discuss late fees again,
20 next year, relative to payments received in 2024,
21 whether those relate to amounts that were billed
22 in 2023 or billed in 2024.

23 And I would certainly reiterate that

1 as the -- as ratepayers, we are subject to the
2 application of late fees to the bills we pay. It
3 seems reasonable that the Company should apply
4 the late fees, which it is entitled to, and which
5 are clearly enumerated in various contracts and
6 tariffs.

7 I'm -- it's unfortunate if their
8 billing systems can't accommodate that easily,
9 but I would certainly hope that they could
10 arrange to apply late fees for the benefit of --
11 even if they can't apply them, I think ratepayers
12 deserve the benefit of those late fees which
13 should be charged.

14 MS. LADWIG: Thank you, Mr. Eckberg.
15 The witness is now available for cross.

16 CHAIRMAN GOLDNER: Thank you. We'll
17 move to cross, Attorney Wiesner.

18 CROSS-EXAMINATION

19 BY MR. WIESNER:

20 Q. So I'll begin by looking at the new spreadsheet,
21 which was marked Exhibit No. 3 for identification
22 purposes. And there is, as you noted,
23 Mr. Eckberg, a difference between your

1 calculation of late fees that might be imputed
2 based on the first CCI bill in 2023 and the
3 number that the Company came up with. And I
4 believe you speculated that it might be due to a
5 compounding methodology applied by the Company;
6 is that -- did I hear that right?

7 A. (Eckberg) That was my hypothesis, yes.

8 Q. Is it also possible that the Company may be using
9 a somewhat different methodology versus counting
10 days and dividing by 30 to come up with, you
11 know, some estimate of what a month might mean
12 or --

13 A. (Eckberg) Oh, absolutely. I don't have specific
14 insight into the Company's late fee calculation
15 methodology, so my hypothesis about the
16 compounding approach was just an attempt to try
17 to understand the difference, yes.

18 Q. And if I understand -- and correct me if I
19 don't -- the revised recommendations of the
20 Department, then, is to use the Company's amount
21 of late fees for imputation for the first CCI
22 bill, or is it the lower amount that you had
23 calculated?

1 A. (Eckberg) I'm certainly willing to use the
2 Company's calculation of \$58,750.

3 Q. But, you are excluding the amounts for the other
4 two CCI bills, as well as the third-party
5 attacher bills that were issued in December?

6 A. (Eckberg) Yes. We are willing to exclude those
7 for the purposes of the 2024 PPAM, which relates
8 to actual expenses and revenues in 2023.

9 Q. And the -- the focus on 2023 is really a feature
10 of how the PPAM rate design works, as other
11 witnesses have previously testified; is that
12 correct?

13 A. (Eckberg) Yes, that's correct.

14 Q. This is really a backward-looking rate mechanism
15 that looks at a particular calendar year and what
16 happened either -- either actually happened or
17 assumed to happen through accrual accounting in
18 that year?

19 A. (Eckberg) Yes, that's correct. That's how the
20 PPAM was proposed by Eversource during the
21 DE 21-020 Pole Attachment Transfer docket, and
22 that's how it was approved by the Commission,
23 yes.

1 Q. And, Mr. Eckberg, the proposed adjustment of --
2 basically including in 2023 the prorated amount
3 billed by CCI during 2023 to its third-party
4 attachers and then credited and paid over to
5 Eversource in 2024, that effectively accrues that
6 prorated amount into 2023; is that -- is that
7 correct?

8 A. (Eckberg) Yes, that's correct. That one is sort
9 of a -- a special, you know, mix of perhaps
10 accrual and accounting adjustment. There's
11 several things going on there at once. Because
12 it relates to the Company's ownership of the
13 poles in 20 -- in May and June of 2023, it seems
14 appropriate to include that amount in this year's
15 PPAM.

16 Q. And the end result of that, I take it, is to have
17 the PPAM rate account for, and credit to,
18 customers the full amount of third-party
19 attachment billings, whether made by the Company
20 or by CCI, into 2023, with no stragglings amounts
21 in 2024; is that a fair way to think of it?

22 A. (Eckberg) I think that's a reasonable way to
23 think of it. A review of the -- of the asset

1 transfer agreement or the settlement between CCI
2 and Eversource did not initially reveal the
3 details of the May and June billing methodology
4 or how Eversource would gain the benefit of pole
5 attachment revenues for those months. So it
6 seemed appropriate that the ratepayers should get
7 the benefit of pole attachment revenue for all
8 months, effective beginning May 1st, which is
9 when the Company began to track expenses related
10 to calendar year 2023 for inclusion in the PPAM.
11 So, again, sort of a balancing of expenses and
12 revenues for this period of time.

13 Q. But it's the Company's position, if I understand
14 it, that -- excuse me -- it's the DOE's position,
15 as I understand it, that the Company -- it
16 doesn't have the contractual right to assess late
17 fees on payments not paid within 30 days, under
18 the pole attachment agreements; that it should be
19 charging those fees or -- or imputing the value
20 of those fees, whether charged or not, to the
21 PPAM revenue requirement?

22 A. (Eckberg) It's the DOE's position that
23 ratepayers should receive the benefit of those

1 late fees, which the Company was entitled to
2 assess on those business entities -- and I'm not
3 suggesting -- I'm not sure what reason the
4 Company would have for not assessing the late
5 fees. There may be reasons that are appropriate.
6 I don't know. But whereas the contract specified
7 that the late fees can be assessed, I believe
8 that the Company has an obligation to try to
9 maximize its revenue, as appropriate, by
10 assessing those late fees. And if they're not
11 going to assess them, then ratepayers should
12 receive the benefit of an imputed late fee, yes.

13 Q. And the Department takes that view,
14 notwithstanding the fact that, effectively, the
15 Company has taken the collection risk through the
16 accrual accounting mechanism, which we would now
17 contemplate applying to \$487,000 as well, because
18 of the contractual right to charge those
19 additional late fees?

20 A. (Eckberg) Because the Company has a contract
21 with CCI, for example, for these amounts, it
22 seems that the -- that Eversource has -- likely
23 has sufficient remedy to collect those amounts

1 from the Company -- from CCI, which is a
2 different type of relationship than the
3 customer -- customer relationship, the ratepayer
4 relationship, which is governed by the tariff.

5 So, yes -- my answer -- the short
6 answer is yes.

7 Q. So even though the Department has, effectively,
8 conceded that only the first CCI bill late fees
9 should potentially be subject to imputation for
10 the year 2023, we can expect to be here next year
11 talking about whether late fees were charged or
12 not in 2024; is that correct?

13 A. (Eckberg) I would -- Yes, I think we can
14 anticipate that, yes.

15 Q. Okay. Thank you. And this is a clarifying
16 question. I think Mr. Letourneau testified that,
17 in fact, the \$487,000 that we've referenced,
18 which is the prorated amount due to Eversource
19 based on the CCI's billing to its third-party
20 attachers last year, that that includes more than
21 the months of May and June for those attachers
22 who were billed on an annual basis.

23 Is that -- do you recall him

1 testifying to that?

2 A. (Eckberg) I don't recall that specifically. It
3 was my impression -- my understanding from the
4 testimony that I heard this morning, that the
5 487,000 related to the May and June, so that it
6 was, in effect, a more accurate number than the
7 simple calculation that I had used to calculate
8 the 319,000 in my Recommendation No. 4. So
9 that's why I have suggested substituting the
10 487,000 number for my 319,000 number.

11 I'm hearing from you now that perhaps
12 it includes something other than May and June
13 amounts.

14 Q. Per Mr. Letourneau's testimony earlier today,
15 the -- he testified that the \$487,000 and change
16 covers the prorated portion of the CCI billings
17 to its third-party attachers, some of which were
18 billed on an annual basis, so, in effect, some of
19 those CCI billings related to months from July
20 through December. And so, crediting those
21 amounts to customers for 2023, is crediting more
22 than just the May and June payments because it
23 credits as well --

1 MS. LADWIG: I'm sorry. I'm just
2 objecting to the extent that Attorney Wiesner
3 seems to be testifying.

4 MR. WIESNER: I'm trying to recap
5 Mr. Letourneau's testimony. This is really a
6 point of clarification. I think the record
7 should make it clear what he testified to, but I
8 think there may be a misunderstanding of the DOE.
9 And I think this is important, because we don't
10 want to be in -- when we sent bills -- when the
11 Company sent bills in December to third-party
12 attachers, there was a very serious effort made
13 to not double-bill attachers.

14 So those attachers who had been billed
15 on an annual basis would have already been billed
16 for the entire year. And so when the Company
17 billed attachers -- and I -- again, I believe I'm
18 recapping what our witness has testified to, and
19 I prefer not to bring them back in the interest
20 of time -- that what they were saying is that,
21 some of the July through December third-party
22 attachment billings had already been done by CCI,
23 didn't need to be done again by Eversource, and

1 that would have been inappropriate.

2 But the \$487,000 received by the
3 Company earlier this year accounted for that as
4 well. So I just -- this is just an attempt to
5 clarify that we're not just talking about May and
6 June.

7 CHAIRMAN GOLDNER: Okay. Is there a
8 question for the witness or --

9 BY MR. WIESNER:

10 Q. Do you agree with all of that?

11 MS. LADWIG: Then apologies again. I
12 would just say that, to the extent Attorney
13 Wiesner added any information that was beyond
14 Mr. Letourneau's testimony this morning, perhaps
15 it's something that could be clarified in a
16 record request.

17 Mr. Eckberg, I think, stated that
18 wasn't his understanding of what
19 Mr. Letourneau said, so I don't think he can --
20 he can add any more testimony as to that point.

21 MR. WIESNER: Well, I won't ask any
22 further questions of Mr. Eckberg on that point.

23 CHAIRMAN GOLDNER: Okay. Do you have

1 any --

2 MR. WIESNER: We'll let
3 Mr. Letourneau's testimony speak for itself.

4 CHAIRMAN GOLDNER: Okay.

5 MR. WIESNER: And I -- I will -- I
6 will not ask my questions about the \$18,000, so
7 as not to violate my own admonition earlier to
8 avoiding asking a fact witness about legal
9 issues. Although, Mr. Eckberg seemed to
10 volunteer an opinion about the meaning of
11 "incrementally."

12 But I think that point has been
13 covered sufficiently in the record, so with that,
14 I don't have any further cross-examination for
15 Mr. Eckberg.

16 CHAIRMAN GOLDNER: Okay. We'll turn
17 now to Commissioner questions, beginning with
18 Commissioner Chattopadhyay.

19 BY CMSR. CHATTOPADHYAY:

20 Q. So I think this will be Exhibit 3, for what you
21 had handed out, so I have some questions about
22 that. I know there is a different estimate by
23 the Company for the 15 June bill.

1 A. (Eckberg) Yes.

2 Q. So that is one issue. As for the second bill, I
3 just want to make sure the bill was dated
4 September 19th, right?

5 A. (Eckberg) Yes.

6 Q. So the due date should have been 20th October.

7 A. (Eckberg) I believe that's correct. And I'm
8 noticing that the due date there is -- on my
9 calculation shows 20th of November. That's what
10 you may be asking about.

11 Q. Correct.

12 A. (Eckberg) Yes.

13 Q. So it should be corrected. I know that you said
14 this doesn't need to be belabored, because
15 it's -- that amount is not included in your
16 revised recommendations.

17 A. (Eckberg) Correct.

18 Q. But my point that I'm going to is somehow still
19 going to touch upon that bill, which is, if it
20 was due on the 20th of October, and, clearly, it
21 hasn't been paid until the end of December, it
22 is -- if you are going to impute everything, you
23 know by end of December what late fees would have

1 been accumulated, correct?

2 A. (Eckberg) As -- I think your question is, since
3 the payment date happened after the end of
4 December in -- as the -- as the table here shows,
5 the information provided by the Company says that
6 bill was paid on the 7th of March of 2024, and
7 your question is, could we perhaps take into
8 account late fees between the due date and the
9 end of the calendar year, in effect, sort of,
10 splitting the late fees between 2023 and 2024,
11 perhaps?

12 Q. Correct. So that is a question because,
13 ultimately, we are imputing numbers here. We
14 haven't imputed the revenue as well, and I'm
15 going to say within quotes, imputed, for -- in
16 Bates page 32 of Exhibit 1, even there, the
17 \$1.2 million number that appear, those are all
18 imputed. That's not necessarily what they have
19 received.

20 A. (Eckberg) Well, I think that -- I think I would
21 use as the Company has used the word, though
22 they're not necessarily imputed, but they're --
23 it reflects an accrual-type accounting. Those

1 amounts were actually billed to the Company in
2 June of 2023, September and November.

3 Q. Agreed. That's why I said in quotes, imputed,
4 because I wasn't sure exactly what to call it,
5 so --

6 A. (Eckberg) Okay.

7 Q. So what I'm saying is, sort of, trying to
8 estimate what is expected in 2023, loosely using
9 the term "expected." So, in that sense, for
10 the -- for the second row here, if not going all
11 the way to December, depending on how the wind
12 goes, you still could be sanguinely sure that we
13 are accumulating late fees, and we can have an
14 estimate for that row?

15 A. (Eckberg) We could have an estimate, but I think
16 that the -- one of the challenges that might be
17 presented with that approach would be
18 understanding the nuances of how late fees are
19 normally calculated under the Company's
20 methodology.

21 With my methodology, for instance, I
22 used a simple approach, as I explained, looking
23 at the total number of days between the due date

1 and the payment date, and then dividing by 30 to
2 get the whole number of months.

3 Now, I can take a wild guess and
4 anticipate that there may be circumstances,
5 depending upon on how the bill date, the due
6 date, and the payment date work out, that we
7 might miss a month. The rounding could work out
8 such that we would only account for one month in
9 December -- in 2023 and one month in 2024, even
10 though the total number of months might be three.

11 So I guess in my -- my sense is that
12 it would be -- there would be an advantage to
13 simply waiting until the next PPAM and looking at
14 the total overall situation and putting -- and
15 arguing to put all the late fees that were
16 calculated, that were imputed, into the proper
17 year, rather than trying to go to the next level
18 of accuracy -- perhaps that's one way of thinking
19 of it -- and splitting that into, some of it goes
20 in 2023, and some of it goes in 2024. It's not a
21 perfect world, in other words.

22 Q. So I think I understand you. I'm just trying
23 to -- I mean, it's kind of a hypothetical

1 scenario. You have late payments due, but you
2 end up not paying your bill, even in 2024. You
3 go beyond 2024. It doesn't show up then, in
4 2024, either. So that's where I'm going.

5 So it's -- it's better to have a
6 mechanism in place -- again, using the term, you
7 need to impute something, and you have enough
8 time, so if this was due 20th October -- sorry --
9 yeah, 20th October, and then you had enough time,
10 it's already -- you know, December has gone by.
11 My question was, you're definitely accruing late
12 payment fees over that period. That's -- that
13 was my --

14 A. (Eckberg) I think I agree with your point,
15 certainly, that late payment charges would be
16 accruing.

17 And please let me take an opportunity
18 to thank you for pointing out the error that the
19 "November" here on my chart should be October,
20 and we will correct that as -- in the course of
21 filing the exhibit later today, we'll certainly
22 make that correction, so thank you.

23 Q. If you -- if you were submitting this beforehand,

1 and you had fixed the November/October issue,
2 will you change the number of months overdue?

3 A. (Eckberg) Yes. Had the November changed to
4 October -- had it been correct there, the number
5 of days overdue would ostensibly increase by 30,
6 and probably the number of months would increase
7 to four instead of three showing in that row,
8 yes. So that would impact the overdue late fee
9 amount, which shows here of \$56,250, but I
10 propose to defer that until 2024, so it's
11 probably a bigger number.

12 Q. So -- so as I summarize this, you're saying,
13 because the payment dates only happened in 2024,
14 we'll wait and take care of it in 2024 for the
15 last two rows? I'm not talking about the 15
16 December '23. The top three, that two of them
17 would be dealt with in 2024, and that's how you
18 go?

19 A. (Eckberg) That's how we can -- that's how we
20 would like to approach it --

21 Q. Yeah.

22 A. (Eckberg) -- and -- and I think we'll be having
23 a -- you know, a redo of this similar discussion

1 next year at this time regarding late fees, yeah.

2 Q. I'll say that I'm still confused given -- let me
3 step back. I'm now really talking about your
4 Adjustment No. 4, so there was discussion about
5 \$487,000.

6 A. (Eckberg) Yes.

7 Q. And it's not clear to me when you're -- and it's
8 not your issue necessarily. But because of the
9 confusion, perhaps, in picking up what exactly
10 the Company was saying, the question remains to
11 me, if it is not 487,000, then how do we -- what
12 is the number that can be associated with May and
13 June, ultimately? So that I don't have clarity
14 right now. I just want to stress that. And I
15 know that you use the rough justice calculation.
16 Do you want to respond to that?

17 Q. Well, I'm -- I'm not sure that -- the
18 interpretation that I have at the moment is not
19 so much that the 487,000 is an incorrect number.
20 I think it's a correct number. However, I think
21 what the Eversource witness and Attorney Wiesner
22 were attempting to clarify were perhaps that the
23 487,000 number is not relevant -- it's more than

1 just May and June pole attachment revenue; that
2 it includes some other slight amounts, which
3 they've described as May and June or --
4 pro forma, they used that word in describing the
5 487,000.

6 My sense is that the 487,000 is still
7 third-party pole attachment revenue that pertains
8 to 2023, but it's -- not just exclusively May and
9 June, that there may be some other parts included
10 there. I haven't quite wrapped my head around
11 how that would be. I guess, that's all I can say
12 about that.

13 Q. I still don't have clarity, because if it
14 includes something else -- if the question is
15 whether that has been picked up somewhere else,
16 and so we don't have double-counting, that's --
17 that's why I'm raising this point.

18 CMSR. CHATTOPADHYAY: I think I'll
19 leave it here. Thank you for your responses.

20 BY CHAIRMAN GOLDNER:

21 Q. All right. Just a clarification. I don't even
22 know that I have any questions.

23 So Category 1, I believe, Mr. Eckberg,

1 that the Department's position is that it agrees
2 with the Company that that amount, for purposes
3 of this filing, should be \$58,750; would you
4 agree with that?

5 A. I would. I do.

6 Q. Thank you. And then for Category 2, you agree
7 with the Company that that number should be zero?

8 A. (Eckberg) Yes.

9 Q. I'm going to skip to Category 5. On Category 5,
10 the Department's position is that it still
11 believes that the 18,000 is appropriate, and I
12 think -- I can ask the Company as well, but I
13 think your understanding, from the Company's
14 testimony, is that the Company believes that
15 should be zero, and, again, the Department
16 believes it should be 18,000; is that correct?

17 A. (Eckberg) Just to be sure, when you say the
18 Company believes it should be zero, the Company
19 -- that would be a zero in my table. They --
20 they proposed to include the 18,000 as an expense
21 through the PPAM, yes.

22 Q. Thank you. Okay. Very good. And then Category
23 4, originally you had \$319,217. The Department's

1 position is that that should be \$487,000?

2 A. (Eckberg) That's based upon my understanding of
3 the testimony I heard from the Company today,
4 yes.

5 Q. Okay. And then I won't challenge you with
6 interpreting the Company's position.

7 I'll just turn to the Company and say,
8 Attorney Wiesner, is that also the Company's
9 position? In other words, are we aligned in
10 coming out of this hearing with all the numbers,
11 or is there still a dispute between the Company
12 and the DOE?

13 MR. WIESNER: Well, I mean, we are
14 trying to understand what the Department's
15 revised position is. And I think, you know, we
16 still believe that there should be no imputation
17 of late fees. So in Category 1, the number
18 should be zero, but if it's going to be anything,
19 we appreciate the Department's concession that it
20 would only apply to the first CCI bill in the
21 number of 58,750, I think it is. Zero for No. 2,
22 because we're only talking about 2023.

23 I believe we have offered to pro forma

1 into 2023 the \$487,000, which is the prorated
2 amount of CCI billings that are attributable to
3 2023 third-party pole attachment fees.

4 And there's -- you know, our number in
5 Steve -- Mr. Eckberg's table for -- for Category
6 5 would be zero. Theirs is 18,000. That is a
7 point of disagreement.

8 CHAIRMAN GOLDNER: Excellent. Well,
9 it was worth the last three hours to get to an
10 \$18,000 discrepancy. I feel good about my job
11 today.

12 Okay. So I think it's clear. I guess
13 my -- before we move to redirect, Attorney
14 Ladwig, I guess the suggestion, just so the
15 Commission has clarity, given the timing of
16 transcripts and so forth, if you could include,
17 please, with your Exhibit 3 the paper filing that
18 Ms. Nixon handed out earlier, just a recreation
19 of that table that you have in Exhibit 2 on Page
20 -- sorry, Page 4, wasn't it? Yes, Page 4. Just
21 include that table in there with your numbers,
22 just so the Commission has the table that the
23 Department is recommending.

1 And I think what we just determined
2 was that we only have -- we have a dispute on two
3 areas. One is that should late fees be a part of
4 the PPAM in Category 1, and then we have the
5 dispute on 18,000 on Category 5. And I think the
6 Commission understands the parties' position on
7 both of those topics.

8 So without any further ado, I'll move
9 to redirect, and Attorney Ladwig.

10 MS. LADWIG: Thank you, Mr. Chairman.
11 Give me one moment. I don't believe I have any
12 redirect.

13 CHAIRMAN GOLDNER: Okay. Thank you.

14 So I think we're all set. So I just
15 want to thank Mr. Eckberg and the Department for
16 the data that enabled a very constructive hearing
17 today, so thank you for that.

18 So we'll move now, I think, to closing
19 statements. But prior to doing so, are there any
20 objections to moving Exhibits 1 and 2 onto the
21 record? And then the filing on Exhibit 3, which
22 was the paper copy already handed out, with the
23 addition of the table from Exhibit 2, Bates page

1 4, any objections?

2 MR. WIESNER: Mr. Chairman, I'll just
3 say, in my view, the version of this exhibit, the
4 handout today, should go in as is, even though
5 it contains the error as to the date that
6 Mr. Eckberg acknowledged on the stand.

7 I think this -- if I understand it,
8 this sets forth his calculation that was
9 incorporated in the Department's recommendations,
10 now revised, of course, as we're going to see in
11 the new table, but I think I would prefer to have
12 this go in as is, with his explanation on the
13 record.

14 CHAIRMAN GOLDNER: Okay. Is there any
15 objections from the Department to that approach?

16 MS. LADWIG: I defer to the Commission
17 on what would be most helpful, so no objection.

18 CHAIRMAN GOLDNER: Okay. So let's do
19 as Attorney Wiesner suggests. And then with the
20 table, it will, of course, reflect a slightly
21 different number, which is what Attorney Wiesner
22 is referring to, for the amount in Category 1
23 between Mr. Eckberg's initial calculation of

1 56,250 and the Company's calculation, which
2 everyone -- both parties accepted later in the
3 proceeding of 58,750, so I think that's on the
4 record and understood, so I think we're okay.

5 And that's very helpful to have that
6 table for the Commission to work off of, so thank
7 you to the Department for working that out.

8 And I guess, just to close on that
9 subject, we'll just make that Exhibit 4, so it's
10 on the record separately from the handout, which
11 is Exhibit 3.

12 (Exhibits 1 through 4 admitted.)

13 CHAIRMAN GOLDNER: Okay. Very good.
14 So we can move now to closing statements,
15 beginning with the Company.

16 MR. WIESNER: I think traditionally,
17 the Company goes last.

18 CHAIRMAN GOLDNER: My apologies. My
19 -- my mistake. Let's move to the Department.
20 Let's stay with tradition on this topic.

21 MS. LADWIG: Yes, thank you. Thank
22 you, Commissioners.

23 I believe, Mr. Chairman, you

1 summarized the Department's position pretty well
2 just now, so I don't have -- I don't really have
3 much to say other than that, which is that, we
4 believe that the third-party -- there should be a
5 late payment fee imputed to late payments from
6 CCI and third-party attachers.

7 We believe for 2023 purposes, that
8 should only include the first bill to CCI. We
9 believe there should be late payment fees to
10 third-party attachers, but those should be in
11 2024, as opposed to 2023.

12 We believe that the \$487,000, which
13 was revenue CCI collected in -- or was owed in
14 May and June of 2023, as well as possibly other
15 months in 2023 and has transferred to the
16 Company, should be included in 2023.

17 And we believe the 18,000 should be
18 excluded, as it is not included in the category
19 of what we understand to be actual physical O&M
20 expenses allowed under the PPAM of transferring
21 conductors from old poles to new poles.

22 And we don't think it's appropriate to
23 include any costs associated with the Company

1 carrying over records from CCI. Presumably, that
2 would have been anticipated ahead of time, and
3 it's just not something that was in the order
4 from the Commission approving the PPAM or has
5 been discussed before this filing.

6 So those are the Department's
7 recommendations. We appreciate the Company's
8 flexibility in calculating -- updating some
9 calculations, figuring out recommended changes to
10 this year's PPAM rates, especially the \$487,000.
11 We think that's fair and reasonable, and
12 appreciate the Company offering that, as well as
13 the calculations of interest that should have
14 been imputed to CCI.

15 And with that, again, we believe that,
16 with Mr. Eckberg's recommended adjustments
17 incorporated, the PPAM proposed by the Company
18 will result in just and reasonable rates, and we
19 recommend that the Commission order that the
20 Company do whatever is necessary to come up with
21 the accurate amount for that, and with that done,
22 approve the -- approve the PPAM.

23 CHAIRMAN GOLDNER: Thank you. And

1 would the Department be comfortable filing
2 Exhibit 3 and Exhibit 4 by end of day Monday?

3 MS. LADWIG: Yes, we would be
4 comfortable with that. And could you -- could
5 you just review again what should be included in
6 Exhibit 4?

7 CHAIRMAN GOLDNER: Certainly. So
8 Exhibit 4 would just be the table from
9 Mr. Eckberg's testimony, Bates page 4. It would
10 just be recapping the amounts so the Commission
11 has that to work from as we sort through each of
12 the amounts and the final -- the final -- the
13 final answer.

14 MS. LADWIG: Thank you.

15 CHAIRMAN GOLDNER: Okay. Well, we'll
16 turn to Eversource and close with Attorney
17 Wiesner.

18 MR. WIESNER: Thank you, Mr. Chairman.

19 So the Company supports the PPAM rate
20 that's been proposed, and we do believe the
21 record demonstrates, through the filings and the
22 live testimony this morning, that the proposed
23 rate adjustment has been calculated accurately

1 and appropriately to allow timely approval by the
2 Commission. In particular, we note that the
3 reconciliations for this year have resulted in a
4 decrease in the overall revenue requirement
5 recovered through the PPAM and the related slight
6 decrease in the PPAM rate for the one-year period
7 beginning on October 1st.

8 With respect to the recommendations of
9 the Department in its technical statement, we
10 believe the testimony of Company witnesses today
11 has clarified that pole attachment fees for the
12 months of May and June 2023 were billed by
13 Consolidated and would be credited to the PPAM
14 revenue requirement for 2024, based on the timing
15 of CCI's credits and payments to Eversource.

16 Notwithstanding that, we have offered
17 to pro forma that amount, which is the \$487,000
18 that we have talked about today, which is the
19 prorated portion of CCI's billings for 2023 to
20 its third-party attachers that are properly
21 allocated to Eversource, both for the period of
22 May through December, May and June for all; and
23 for some, July through December as well, with

1 respect to poles that are actually located in the
2 Company's service territory. So we've agreed to
3 make that adjustment, and I believe that is no
4 longer an issue in dispute, as noted by the
5 Commission.

6 With respect to the late fees, we
7 don't believe there's a basis for decreasing the
8 PPAM revenue requirement to account for imputed
9 late fees on the amounts billed to, but paid late
10 or unpaid by, third-party attachers, including
11 CCI, because the amounts billed by the Company
12 were credited to the PPAM rate when the billing
13 occurred through accrual accounting. And the
14 PPAM is designed to cover costs and related
15 revenue amounts on an annual calendar year
16 lookback basis, without carry charges on the cost
17 components.

18 Accordingly, there is no mismatch
19 between charges to customers and attachment fees
20 -- attachment fee crediting that warrants the
21 imputation of late fees. Customers are held
22 harmless to any delay in payment by the
23 attachers, and, as a result, it would not be

1 appropriate to apply late payment fees as a
2 credit to customers, when the PPAM calculation
3 essentially assumes 100 percent of the amounts
4 billed are paid at the time they are billed.

5 Finally, we do believe it was the
6 intent of the PPAM rate mechanism to cover
7 incremental costs related to the CCI pole
8 acquisition until the next rate case can account
9 for those new and additional costs. And those
10 incremental costs for inclusion in the PPAM rate
11 include expenses, such as, the approximately
12 \$18,000 expense line item that was -- that's been
13 called into question by the Department.

14 As testified this morning, without the
15 incurrence of those expenses, it would not have
16 been possible for the Company to obtain the
17 third-party attacher revenues that offset other
18 PPAM expense items that factor into the overall
19 PPAM rate calculation. The costs would not have
20 been incurred but for the Company's acquisition
21 of the CCI pole infrastructure. They are
22 incremental to amounts collected in base rates or
23 elsewhere and are necessary in order to ensure

1 the accuracy of billings associated with the
2 acquired pole interests.

3 That cost recovery is consistent, in
4 our view, both with the Commission's approval
5 order in DE 20-020 [sic] and the Company's
6 compliance tariff for the PPAM submitted as a
7 result of that approval.

8 So, in closing, we appreciate the time
9 and efforts of the Commission and parties in this
10 docket to review the Company's filing and
11 proposed PPAM rate adjustments, and we'd ask that
12 the Company [sic] approve the rate adjustment as
13 proposed by the Company without modification,
14 except as otherwise agreed, on a timely basis, so
15 that the new rates will become effective on
16 August [sic] 1st.

17 And, as we discussed earlier, I
18 believe an order by Monday or Tuesday of -- I
19 should say the 23rd or 24th will be somewhat
20 tight, but should be sufficient from the
21 Company's perspective. Thank you.

22 CHAIRMAN GOLDNER: And I think you
23 meant October 1st, not August 1st. I knew what

1 you meant.

2 MR. WIESNER: If I said August, I
3 misspoke. It's obviously for October 1st.

4 CHAIRMAN GOLDNER: Perfect. Thank
5 you.

6 Okay. We'll take the issues presented
7 at the hearing under advisement. Before we
8 adjourn, is there anything else that we need to
9 discuss today?

10 Okay. Seeing none. Thank you. We
11 are adjourned.

12 (Whereupon, the proceeding
13 concluded at 12:23 p.m.)

14

15

16

17

18

19

20

21

22

23

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

C E R T I F I C A T E

I, Nancy J. Theroux, do hereby certify that the foregoing transcript is a true and accurate transcription of the within proceedings, to the best of my knowledge, skill, ability and belief.

THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME BY ANY MEANS UNLESS UNDER THE DIRECT CONTROL AND/OR DIRECTION OF THE CERTIFYING REPORTER.

Nancy J. Theroux
NANCY J. THEROUX
Licensed Court Reporter
NH LCR No. 100



102:12 103:7 118:16
128:23 133:9
began 110:9
begin 7:11 19:6
106:20
beginning 4:17 53:9
110:8 116:17 130:15
134:7
behalf 5:3
belabored 117:14
believes 41:2 46:19
69:19 125:11,14,16,
18
benefit 74:18 77:18
78:1 80:1,2 89:17
90:3,19 92:6,21
97:22 106:10,12
110:4,7,23 111:12
benefits 89:9
biased 96:20
bigger 122:11
bill 19:21 21:14 24:19
37:11,23 38:3 41:14
44:5 47:3 58:13
67:13,20 68:5,17,18
71:10,11 72:2,5,9,19
76:20 84:17,22
85:11,20 86:15,16
87:3,12 90:8,11,14
104:11,22 107:2,22
112:8 116:23 117:2,
3,19 118:6 120:5
121:2 126:20 131:8
billable 92:10
billed 19:12,17,22,23
20:5,17,19 21:9
22:9,11,15 24:1,3,5,
8 25:11,19,20,21
26:3,12 33:22 34:12,
23 35:3 36:6,17
38:17 40:3 45:14
47:10 63:14,22 64:7,
20 66:16,20 67:8
72:6 73:6,12,16
74:13 75:8,16,19,20
76:11 79:17,21
88:22 89:13 99:17
105:21,22 109:3
112:22 113:18
114:14,15,17 119:1
134:12 135:9,11
136:4
billing 23:19 24:15
26:4 27:6 28:10 39:6
43:15 44:4,12 45:5
54:14 64:21 71:17
73:9,19 75:12 77:8
93:9 106:8 110:3
112:19 135:12
billings 21:1,21 22:3,
6 26:2,8 27:13 28:10
79:19 109:19
113:16,19 114:22
127:2 134:19 137:1
bills 10:11 20:2
22:19,21 23:2 24:2
37:8 38:10 55:13
67:2 74:4 82:22
84:15,20 86:15 87:4,
7,20 93:7,15 96:15,
17 99:21,22 102:20
103:22 104:1,6
105:1 106:2 108:4,5

114:10,11
bit 12:12 29:6 52:6
55:17 89:14
booked 72:15,20
bottom 37:4
break 64:15 65:10
67:7
briefly 5:6 10:2 13:8
bring 114:19
bringing 75:3
broader 59:13
burden 46:17 62:22
burdensome 90:16
business 4:21 62:7,
13 64:2 111:2
bygone 61:22

C

calculate 24:13
38:13 55:23 61:12
113:7
calculated 9:2 55:10
67:16 68:4 69:3
82:21 83:16 85:5,6
86:6 88:5 99:7
104:23 107:23
119:19 120:16
133:23
calculates 69:22,23
calculating 31:5,14
132:8
calculation 25:18
26:9,18 28:4 50:7,9
64:11,13 65:13 67:6
69:12 82:22 83:12
85:7,18,22 86:4,14,
20,23 87:1,11 88:7
93:16 98:9 107:1,14
108:2 113:7 117:9
123:15 129:8,23
130:1 136:2,19
calculations 6:21 8:7
13:11 86:19 88:14
132:9,13
calendar 4:9 19:23
21:7,10 23:12,22
29:15 32:10 34:15
41:7 47:20 50:17
66:10 68:23 72:7
78:18 91:2 108:15
110:10 118:9 135:15
call 84:9 91:1 104:11
119:4
called 136:13
capital 16:1,6 78:21
80:16
capture 53:12 54:18
55:16 56:9 104:16
captured 37:16
captures 105:13
capturing 27:5
care 122:14
carry 25:1 49:13
135:16
carrying 24:20 41:6
42:14 47:9 48:11,13

49:3,8,15 50:3 78:9
79:9 132:1
case 41:8 49:12
50:18 68:10 94:4,5
95:5 97:17 136:8
cases 20:4 58:20
75:18
catching 68:16
categories 58:3 92:3
104:2
category 29:12 31:13
32:7 34:4 58:7,10
59:4 69:13 124:23
125:6,9,22 126:17
127:5 128:4,5
129:22 131:18
caught 52:6 97:14
CCI 19:17 20:1,9,13,
17,23 21:14,17 22:8,
10,14,19 23:7,11
26:3,5,13 27:1,4,9
28:7 32:3,6 34:12,15
35:1,11,21 36:6,14,
17 37:7,9,12,21,23
38:4,10,20 39:5
42:19 43:1,8,21
44:3,7 45:2,6,8,9,16
46:7 48:19 53:18,22
54:6,10 55:13 56:19
57:10,12,18 59:22
62:17 64:12 67:2,8
68:5,18 69:22 71:10,
17 72:2,18 73:6,18
74:14 75:8,12 76:3,
11,20 79:18,21
82:23 84:16 85:16
86:18 88:22 89:13
90:18,22 91:11,22
92:7,10,17 93:12
99:17 101:8 103:17
104:21,22 107:2,21
108:4 109:3,20
110:1 111:21 112:1,
8 113:16,19 114:22
126:20 127:2 131:6,
8,13 132:1,14
135:11 136:7,21
CCI's 19:20 21:19,23
22:2,5 45:21 112:19
134:15,19
cents 5:13
Chairman 2:3,12,19
4:2,3,18,22 5:10,18,
21 8:1 10:1,18 11:5,
9,22 12:8,9,20
28:20,21 51:9,11,21
53:8 58:22 61:20
64:22 65:20,23
67:10 68:6 69:14
70:4,11,23 71:4
80:20 81:6,9,10,12
83:20,23 84:3,7
94:2,19 95:8,12,15
106:16 115:7,23
116:4,16 124:20
127:8 128:10,13
129:2,14,18 130:13,
18,23 132:23 133:7,
15,18 137:22 138:4
chalkboard 5:12
challenge 126:5
challenges 119:16
chance 71:22

change 10:7 14:9
60:15,23 90:21
101:21 105:10
113:15 122:2
changed 122:3
Chapter 4:13
charge 13:13 39:9,11
41:6 46:7 54:17
71:20 96:2 111:18
charged 39:8 40:16
54:16 72:17 106:13
110:20 112:11
charges 24:20 41:6
42:14 44:9 45:1 47:9
48:11,13 49:4,8,13,
15 50:3 72:6 75:1
78:9 79:9 91:3
121:15 135:16,19
charging 78:1,9
110:19
chart 89:18 121:19
Chattopadhyay 2:12,
18 4:4 53:10,11 59:6
60:10,14 61:18 70:9
71:1,3 116:18,19
124:18
check 42:2 55:7 61:9,
22,23 62:3 70:12,16
checking 70:17
Chen 2:7 11:19 12:6
13:3,6,10,21 14:1,4,
17 23:15,20 24:7
25:1,13 26:1,14
28:13,17 32:21
34:13,16 35:2 36:16,
21 37:15 38:7,15
39:23 40:22 42:2,6,
11,16 45:20 46:2
47:13,20 48:10,15
49:1,18 50:2,7 52:7
53:2 55:7,20 57:5
60:16 61:9,16 73:23
74:7,11,19 75:3
76:18 77:3,11,16
78:6,13,20 79:2,12
80:3,9,13,17
circumstances 25:8
46:22 120:4
clarification 60:11
61:2 95:20 114:6
124:21
clarified 115:15
134:11
clarify 5:7,9 56:23
91:19 96:18 98:15
115:5 123:22
clarifying 98:12
112:15
clarity 57:4 123:13
124:13 127:15
cleaning 56:17,18
clear 53:6 54:12
91:12 114:7 123:7
127:12
close 130:8 133:16
closed 19:15 35:18
closing 2:20 19:19
20:1 21:16 27:4
33:23 57:8,12 75:9
103:15 128:18

130:14 137:8
Cmsr 2:12,18 53:11
60:10,14 61:18 70:9
71:3 116:19 124:18
collaborating 16:7
collaboration 21:17
collect 4:9 10:23
20:5 38:19 39:4
45:17,19,22 46:3
49:11 62:8,10
111:23
collected 21:2 28:8
39:19 45:9 76:6
79:22 91:4 131:13
136:22
collecting 35:12
42:14 48:13
collection 45:21
47:15 74:8 111:15
column 30:19 34:20
47:17 87:13 98:2
columns 34:9 85:2
comfortable 133:1,4
COMMENTS 2:3
commercial 96:11
Commission 2:11,17
7:1 8:5,9 9:15,19,22
10:3,19 14:10 16:14
18:4 46:9 50:20
51:12 52:8,21 59:5
61:23 62:20,21,23
64:23 65:11 77:17
108:22 127:15,22
128:6 129:16 130:6
132:4,19 133:10
134:2 135:5 137:9
Commission's 7:19
137:4
Commissioner 4:4
5:15 7:23 53:9,10
60:21 71:1 116:17,
18
Commissioners 4:19
5:2 91:18 130:22
commitment 46:10
Communication 17:6
Communications
18:18
Company 4:17,20
8:4 9:5,10 10:6 13:9,
16 15:3,22 17:18
19:14 20:6,11,14
21:8,14 22:10,16
23:17 24:5,8,14
26:17 27:16,23
28:15 31:11 33:11
39:10,14 40:7 41:1,2
42:9,13 43:14 44:15
45:8,12,22 46:2,8,19
47:2 49:3,7 50:20
52:11 55:10 57:14,
19 59:20 62:7,12,14,
15,18,22 63:22 65:2,
14,16 66:1,20 67:3
69:19,23 70:3 71:15,
19 74:13 76:23 77:8
78:8 79:5,10,17,22
84:1,16 85:4 86:3
87:6,19 88:17,20
89:4,7,23 90:4,13
94:14 95:22 97:15

- 99:9,12 100:4,12,21
101:3,11,15 102:18
103:9,21 104:23
105:7 106:3 107:3,5,
8 109:19 110:9,15
111:1,4,8,15,20
112:1 114:11,16
115:3 116:23 118:5,
21 119:1 123:10
125:2,7,12,14,18
126:3,7,11 130:15,
17 131:16,23
132:12,17,20 133:19
134:10 135:11
136:16 137:12,13
- Company's** 13:18
15:5 16:20 17:3
18:1,6,9,15 20:8,22
22:12 23:1 24:21
28:6 37:2,5 39:6
43:7 46:6 54:13
69:12,16 72:13 73:4
75:1 77:22 80:15
96:7,10 100:19
103:6,11,18 107:14,
20 108:2 109:12
110:13 119:19
125:13 126:6,8
130:1 132:7 135:2
136:20 137:5,10,21
- comparable** 69:6
compares 69:5
complete 33:14
completed 6:22
54:22
completely 52:6
105:3
complexities 27:11
73:18
compliance 137:6
complicated 43:16
89:14
component 8:11,17
32:18 47:18 48:17
49:22 51:8 58:9
components 8:16,19
9:2 25:4 27:21 42:8
49:16 94:16 135:17
compound 85:19
compounding 86:8
107:5,16
conceded 112:8
concession 126:19
conclude 59:12
concluded 138:13
conducted 34:1
conductor 29:18
30:11,13,18,23
31:19
conductors 58:8
131:21
confidence 56:11
confident 92:7
confined 66:9
confirm 13:4 32:2
41:21 43:3 76:10
confused 53:18
123:2
- confusing** 91:13
confusion 123:9
conjunction 43:8
considerably 80:10
consistent 9:13 20:8
50:14 93:10 137:3
consisting 32:10
Consolidated 17:5
18:18 20:5 25:22
32:12 33:22 134:13
Consolidated's
19:11
Consolidated-owned
33:21
constraint 61:17
constraints 46:16
construction 94:6
constructive 128:16
contemplate 111:17
contract 45:2,6 90:18
92:8,14 111:6,20
contractor 33:14
contracts 45:4 47:3
92:11,17,23 106:5
contractual 110:16
111:18
convene 4:12
convert 5:13
coordinate 57:9
103:15
coordinating 13:10
copy 84:6,13 128:22
correct 5:22 22:23
23:17,20 24:6,7 30:1
31:22 32:1 34:12,13
35:1,2,9,14,15,19
39:1 42:6,11 44:12
47:13,20 48:9,10,11,
15,23 49:1,18 50:2
53:2 54:1 55:1,6,8
57:2 61:7,16 62:12
68:12,14 69:7,9
71:13,14 72:12,16,
22 73:13,14,21 74:7,
11,12 75:10,11,15,
22 76:7,8,17 77:3,11
78:20 79:2 80:3,17
86:5 104:18 107:18
108:12,13,19 109:7,
8 112:12 117:7,11,
17 118:1,12 121:20
122:4 123:20 125:16
corrected 117:13
correction 15:13,17
121:22
corrections 82:1,3
correctly 30:14 35:6
43:19 100:14
correspond 98:17
100:11
cost 13:13 15:2
27:21 29:14 30:4,10,
13,18,23 31:19,23
32:13 42:4,8 47:21,
23 48:7 52:17 58:6
60:22 78:22 80:15
104:1 135:16 137:3
- costs** 4:9 21:6 24:17,
22 25:1,4,5 28:5
29:13,17 30:8 31:3,
10,21 32:8,9,17,22
41:7 46:11,18 48:4
49:4,5,8,9,10 57:20
58:12,17 59:23 77:5
78:9,17 79:9,10
94:11 102:20 104:5,
8,10,11 131:23
135:14 136:7,9,10,
19
counting 107:9
couple 51:19 61:21
103:8
cover 104:4 135:14
136:6
covered 22:3,6 59:12
116:13
covering 20:12 22:17
covers 8:17 21:6
23:11 26:23 35:7
113:16
created 27:2
credit 25:17 26:7
41:5 50:14 74:2
76:21 88:21 109:17
136:2
credited 23:23 24:3,
9,17 26:3 63:12
64:7,20 73:5,11
74:9,16 76:21 79:16,
19 109:4 134:13
135:12
crediting 113:20,21
135:20
credits 113:23
134:15
cross 2:9,16 28:23
29:5 65:7 106:15,17
cross-examination
6:15 7:23 29:3 82:5
106:18 116:14
CSMR 59:6
curious 32:20
current 15:15 94:6
custom 7:14
customer 16:6,11
24:12 41:12 50:14
74:1 79:13,14,15
96:19 112:3
customers 23:23
24:13 25:14,17 26:7
41:3,18 49:11 63:11
64:19 73:10 74:9,18
75:2 76:22 78:2
79:19,23 96:11
97:21 109:18 113:21
135:19,21 136:2
- D**
- data** 27:4,5 37:3 44:7
56:19 87:22 94:9
99:20 103:19 128:16
date 6:20,23 9:22
11:4,7 24:18 35:17
37:11 38:3,11 48:13
66:22 67:14,15,20,
22,23 68:19,21 72:2
75:10 84:18,23 85:4,
8,9,10 87:4,22 88:3,
4 90:8 94:23 117:6,8
118:3,8 119:23
120:1,5,6 129:5
dated 67:13 117:3
dates 10:13 38:10
73:7 84:17,18,22
93:9 122:13
David 4:19
day 133:2
days 23:1 38:13 67:4
71:12,23 72:7 84:23
85:6,7,10,13 87:7,8
107:10 110:17
119:23 122:5
DE 4:6 14:5 52:8
108:21 137:5
dealt 56:12 122:17
December 20:4,12
21:15 22:16,17,20
23:3,19 24:1 27:14
34:20 35:3,8 44:6
63:14,22 66:21
68:20 71:12 72:1
73:9,16 83:11 87:5,
8,19 93:8 98:1,5
108:5 113:20
114:11,21 117:21,23
118:4 119:11 120:9
121:10 122:16
134:22,23
decision 62:7,14
64:2
decrease 8:12 15:15
134:4,6
decreasing 135:7
dedicated 51:14
dedication 27:7
deemed 43:7
defer 93:12 122:10
129:16
defined 29:13,14
32:8 33:17
delay 25:14 39:1 56:4
73:17 135:22
deliver 7:13 10:19,21
Deloitte 14:6 52:9,12
demonstrates
133:21
Department 3:5,7,9
4:23 5:3,5 8:2,4,6
9:5,7,9 29:1 37:3
59:11 62:16,21 63:1
65:4 69:18,22 81:16,
19 91:7 93:21
102:16 105:18
107:20 111:13 112:7
125:15 127:23
128:15 129:15
130:7,19 133:1
134:9 136:13
Department's 7:17
8:23 10:4 19:7,9
62:9 63:2 125:1,10,
23 126:14,19 129:9
131:1 132:6
depending 119:11
120:5
depends 95:4
derive 32:5 98:6
derived 30:22 98:11
describe 13:8 26:22
30:9
describing 124:4
description 3:2
102:14 104:13
deserve 90:19
106:12
design 15:2 24:23
25:6 108:10
designed 50:16 51:2
135:14
detail 22:8 26:22
detailed 50:7 93:16
details 87:3 93:15
100:4 102:17 110:3
determine 21:21
33:11 89:14 98:7
determined 33:6
128:1
development 16:5
difference 9:9 60:5
86:11,12 92:3 101:4
106:23 107:17
differences 54:9
differently 63:1
differing 9:1
direct 2:8,15 7:21
12:11 13:1 15:14
28:19 29:6 35:7,21
36:10 42:13 52:1
73:23 81:11,13 82:5
directed 46:9 50:19
52:7 77:17
direction 13:23 15:10
17:8 18:20
directly 103:1
Director 13:6
disagree 103:20
disagreement 127:7
disclosure 96:13
discovery 83:8 85:5
87:15 102:17
discrepancy 14:12
53:4 127:10
discuss 51:15
105:19 138:9
discussed 40:22
53:12 55:14 94:8
98:22 99:10 132:5
137:17
discussing 82:7
discussion 46:5 78:8
98:20 105:14 122:23
123:4
discussions 9:6
84:19
dispense 12:11
dispute 126:11
128:2,5 135:4
distribution 16:1,6,
11 75:1

dive 82:8	129:23 132:16 133:9	74:6,8 76:2,7,16	extent 114:2 115:12	15:18 17:14 19:3
diverse 73:19	effect 32:13 33:5	80:21 82:23 83:8	external 16:8	28:14 36:23 52:13
divide 98:5	41:8 48:14 103:3	84:16 85:16 87:14	extra 27:6	81:20
dividing 107:10	113:6,18 118:9	92:7,13,16,19 93:7		filing 7:16 8:8,15
120:1	effective 4:11 6:20,	94:8 96:13,19	F	12:15 13:19 14:5
Division 81:19	22 10:13 19:20	108:20 109:5 110:2,		15:6 16:20 18:6,9
docket 4:6 14:5,13	33:10 75:10 94:23	4 111:22 112:18	fact 19:12 59:1,18	20:22 21:6 23:11
52:8 81:21 108:21	110:8 137:15	114:23 123:21	60:8 63:4,6 64:19	32:19 53:4 64:9 66:7
137:10	effectively 23:23	133:16 134:15,21	65:8 72:8 74:8 80:14	91:9 105:4,5 121:21
DOE 25:10 26:11,16	73:10 76:9,19 109:5	Eversource's 6:8	111:14 112:17 116:8	125:3 127:17 128:21
29:11 55:3 56:22	111:14 112:7	22:1 30:18 44:1	factor 28:4 136:18	132:5 133:1 137:10
57:2 58:1 69:5,11	efficient 7:20	53:23	fair 11:9 22:18 27:11	filings 6:7 13:12
114:8 126:12	effort 39:9 54:16,23	evidence 66:12	45:8 73:22,23 74:19	14:13 40:13 77:7
DOE's 6:9,11 7:1	55:22 114:12	exact 56:6 63:2 103:5	79:3 80:6 99:19	133:21
34:5 46:20 80:23	efforts 45:21 137:9	examination 13:1	109:21 132:11	final 95:7 102:5
90:12 110:14,22	elaborate 104:18	28:19 71:6 81:13	fairly 82:21	133:12,13
dollar 52:18	electric 22:3	Excel 70:13 85:5	fall 75:5,6	final-final 95:6
dollars 5:13	elements 29:8 42:5	Excellent 127:8	familiar 96:15	finalized 10:11
double-bill 44:14	enabled 128:16	exception 8:8	Farley 2:6 11:18 12:6	Finally 28:13 136:5
114:13	end 9:16,17 20:3,4	excess 20:14 80:7	17:16,19 18:5,11,14,	financial 16:10
double-counting	48:6 53:21 72:1,3	exclude 108:6	21 19:1,4	find 9:15 32:19
124:16	75:21 88:3 101:22	excluded 131:18	feature 25:6 108:9	finds 9:19
doubt 99:5	109:16 117:21,23	excluding 108:3	February 20:16	fit 59:4
driver 27:14	118:3,9 121:2 133:2	exclusively 124:8	35:22 76:5	fixed 122:1
due 22:21 23:4 27:3	ended 9:1	excuse 72:21 90:10	fee 20:10 21:1 25:16	flexibility 132:8
37:11 38:2 41:5 44:6	ends 5:19	92:16 110:14	37:6,9,20 38:1 40:9	flow 77:22
46:16 50:15 61:16	energy 3:3,5,7,9	excused 80:21	54:17 55:4,13 56:7	fly 50:9 60:19
66:21,22 67:14,17,	4:21,23 13:12 29:1	executing 16:5	64:1 65:13 67:18	focus 7:16 12:13
22 68:19 71:12 72:2	81:19	execution 16:5	68:2,23 69:1 71:22	108:9
73:17 84:18,23 85:8,	engage 9:5	exhibit 4:15 13:20	72:5,11,18 85:23	focused 59:2
10 87:7 90:8 93:9	engaging 59:11	15:7 16:21 18:10	86:10,19 88:6 90:7	focusing 59:14
100:6 107:4 112:18	ensure 22:8 28:9	19:8 26:21 29:21	92:9 93:1 96:1	follow 97:1
117:6,8,20 118:8	136:23	33:3 34:4,7 36:22	107:14 111:12 122:8	follow-up 72:9 91:19
119:23 120:5 121:1,	ensures 24:13	37:1 42:21 45:12	131:5 135:20	forecast 47:15
8	entered 87:13	47:14 55:15 57:22	feel 103:21 127:10	forgot 51:19
duly 12:7 81:9	entire 114:16	73:1 81:22 82:9	fees 17:4 21:12,22	forma 77:13 79:18
	entities 111:2	83:20 84:5,9 86:21	23:6,16 25:11,17,21	124:4 126:23 134:17
E	entitled 35:16 62:10,	87:16 88:8,18 89:19	26:12 38:15,17,20	formulate 56:5
	13 74:3 106:4 111:1	97:11 102:13 103:7	39:4,7,9,11,12,15,	fortunate 96:16
earlier 41:5,17 46:6,	enumerated 58:3	106:21 116:20	20,21 40:3,12,17	forward 27:6 44:16
12 48:16 61:17	106:5	118:16 121:21	41:2,22 42:18,22	54:21 56:19 94:5
66:19 78:8 104:14	equivalent 80:5,6	127:17,19 128:21,23	43:5,14,18 44:16	95:14
113:14 115:3 116:7	era 61:22	129:3 130:9,11	45:1 46:8 47:4 48:19	found 52:14
127:18 137:17	error 121:18 129:5	133:2,6,8	49:21 53:13,16 54:3,	fourth 56:22 105:9
earliest 22:22 72:10	essentially 25:18	exhibits 3:2 4:15	15,18 55:11,19,23	front 52:21
early 21:5	40:8 100:22 136:3	128:20 130:12	60:3 61:6,13 62:6,8,	full 19:23 24:7 26:7
ease 29:7	establish 4:7	expect 53:18 112:10	10,17,19 63:9,18	33:23 63:12 64:20
easiest 104:15	establishing 9:14	expected 119:8,9	64:6,11,18 65:4	73:11 74:10 75:17,
easily 106:8	estimate 98:7 107:11	expense 26:18,23	66:2,13 67:7,19	20 79:16,20 80:1
Eckberg 2:14 3:6,8,	116:22 119:8,14,15	28:3 51:7 57:15	69:2,17,21 71:16,20	81:3 89:8 90:4 92:21
10 5:4,5 37:1 81:1,2,	estimated 83:12	58:2,3,5,9,16 103:4,	74:13,16 75:5 76:14,	93:16 96:13 109:18
5,8,17,23 82:3,11,19	event 72:15	14 125:20 136:12,18	21 79:4 80:2,4	fully 37:16 97:19
83:17 84:4,12 88:13	eventually 36:14	expenses 23:12,13	82:16,20 83:5 89:12,	fundamental 63:8
92:5 95:22 96:9,21	Eversource 3:3 4:6,	27:15,19 28:1,3	15 90:6,14,17,19,20,	future 62:1,2
97:9 98:17 99:3,12	10,21 7:11 8:7 9:12	49:23 59:3 78:17	22 91:9,22 92:4	
101:1 102:9 103:18	11:11,12 13:5 14:19	91:2,10 102:15	93:12,13,23 96:8,14	G
105:11,17 106:14,23	20:18 21:2,23 27:5	104:3 108:8 110:9,	104:21,22 105:19	gain 110:4
107:7,13 108:1,6,13,	29:17 30:10 31:2,9,	11 131:20 136:11,15	106:2,4,10,12 107:1,	general 47:5 55:15
19 109:1,8,22	12 32:2 34:12,23	explained 43:13 45:8	21 110:17,19,20	74:23 75:4
110:22 111:20	35:13,16,20 37:7,9,	99:6 103:2 119:22	111:1,5,7,10,19	generally 23:16
112:13 113:2	13,21,23 38:5,16,19	explains 37:5,19	112:8,11 117:23	58:19 94:2 96:1
115:17,22 116:9,15	39:3,19 40:16 43:4	explanation 21:13	118:8,10 119:13,18	generated 10:11
117:1,5,7,12,17	45:9,15,18 48:7	51:4 129:12	120:15 121:12 123:1	
118:2,20 119:6,15	53:20 61:12 67:18	extensive 60:8 88:16	126:17 127:3 128:3	
121:14 122:3,19,22	68:3,18 69:3 73:19	90:17	131:9 134:11 135:6,	
123:6 124:23 125:8,			9,19,21 136:1	
117 126:2 128:15			figure 5:12,17 8:20	
129:6			figured 44:21 97:1	
Eckberg's 127:5			figuring 132:9	
			file 15:4 16:18 18:7	
			filed 7:18 14:16	

generic 46:23	93:6 95:22 101:2 104:13 113:4 126:3	included 12:19 21:5 32:15,17 39:21 40:18 41:22 47:11 48:21 58:9 60:22 61:6 72:11 83:1 89:16 90:20 94:9 100:8,16,23 101:12 103:2 104:3 117:15 124:9 131:16,18 133:5	interest 85:15,19 86:8,9,10 114:19 132:13	84:21 89:1 90:8 97:5,23 98:7 99:14 100:6,18,22 101:17 109:13 110:3 112:21 113:5,12,22 115:6 116:23 119:2 123:13 124:1,3,9 131:14 134:12,22
give 40:1 54:11 56:3 63:4 65:2 70:15 82:11 89:8 101:23 102:3 128:11	hearing 4:6,12 6:5,11 14:15 19:8 94:4 113:11 126:10 128:16 138:7	includes 4:15 20:19 31:23 37:2 58:11 73:15 112:20 113:12 124:2,14	interested 7:2	justice 123:15
giving 58:14 88:21	held 25:14 135:21	including 6:7 22:2 63:14 71:17 74:14 89:12 109:2 135:10	interests 28:11 137:2	<hr/> K <hr/>
glad 83:17 95:19,20	helpful 10:17 11:8 12:2 37:17 83:18,21 102:2 129:17 130:5	inclusion 110:10 136:10	internal 16:8	<hr/> kilowatt 5:9,13
Goldner 2:3,12,19 4:2,3,22 5:10,18,21 8:1 10:1,18 11:5,9, 22 12:8,9,20 28:21 51:9,11,21 53:8 61:20 64:22 65:20, 23 67:10 68:6 69:14 70:4,11,23 71:4 80:20 81:6,9,10 83:23 84:3,7 94:2,19 95:8,12,15 106:16 115:7,23 116:4,16 124:20 127:8 128:13 129:14,18 130:13,18 132:23 133:7,15 137:22 138:4	higher 40:21 42:1,7 80:14 103:12	incomplete 27:3 44:7	interpret 104:4	kind 8:20 72:9 120:23
good 4:2,19 5:1 6:1 8:3 15:23 17:19 53:12 84:10 125:22 127:10 130:13	honest 29:5	incorporated 129:9 132:17	interpretation 59:14 102:23 103:21 104:12 123:18	knew 137:23
governed 112:4	hope 106:9	incorrect 123:19	interpreting 30:14 126:6	knowledge 40:14 55:20
greater 86:6	hopeful 10:20	increase 8:10 101:21 122:5,6	interrupt 94:3	<hr/> L <hr/>
green 12:1	hours 127:9	increased 27:15	interruption 95:18	labeled 85:1
group 73:19	hypothesis 107:7,15	increases 46:17	introduction 12:22	Ladwig 2:5,9,15 5:1, 2,15,19,23 8:3 29:2, 4 51:9,10,17,22 53:5 81:10,12,14 84:10 88:10 94:3,7 95:17, 19,21 106:14 114:1 115:11 127:14 128:9,10 129:16 130:21 133:3,14
guess 5:16 38:12 43:6 50:5 87:11 90:23 97:18 120:3, 11 124:11 127:12,14 130:8	hypothetical 120:23	incremental 24:18 28:1,7 33:17 57:7, 14,20 59:15 102:20 103:14,23 104:5,7, 10 136:7,10,22	INTRODUCTORY 2:3	language 9:13 45:2,7 59:14 104:2,12
guessing 86:12	<hr/> I <hr/>	incrementally 103:12 116:11	invite 67:5 80:23	large 96:11
<hr/> H <hr/>	lan 2:6 11:18 12:6 17:19	incur 27:23	invited 9:5	largely 8:6 34:5
half 94:23	idea 94:15	incurred 24:22 27:15,19 28:6 41:7 49:4,10 57:8,19 78:10 79:9,11 91:11 103:14 136:20	invoice 26:6 47:12	lastly 17:16
Hampshire 4:21,23 13:7 14:22 18:1 29:1 81:19	identification 13:19 15:6 16:21 18:10 106:21	incurrence 136:15	invoiced 23:18 37:13	late 21:12 23:6,16 25:11,16 26:12 37:5, 8,9,14,20,22 38:1,6, 8,14,15,16,19 39:4, 7,9,11,12,15,19,20 40:3,9,12,17 41:1,21 42:18,22 43:5,14,17 44:9,16,23 46:8 47:3 48:18 49:20 53:13, 16 54:3,15,17,18 55:4,11,18,23 56:7 60:3 61:5,12 62:6,8, 10,17,19 63:9,18 64:1,6,11,18 65:4,12 66:2,13,16 67:7,8, 17,19 68:2,9,22 69:1,2,16,21 71:16, 20,22 72:5,11,18 74:13,15,23 75:5 79:4 80:2,4 82:15,20 83:5,12 85:23 86:10, 18 87:22 88:6 89:12, 15 90:6,7,14,17,19, 20,22 91:3,8,21,22 92:3,9 93:1,12,13,23 96:1,7,14 104:21 105:19 106:2,4,10, 12 107:1,14,21 110:16 111:1,4,7,10, 12,19 112:8,11 117:23 118:8,10 119:13,18 120:15 121:1,11,15 122:8 123:1 126:17 128:3 131:5,9 135:6,9,21 136:1
hand 81:7	immaterial 52:19	independent 52:12	involved 21:22 27:7 46:14	lay 6:4
handed 116:21 127:18 128:22	immersed 91:17	indifferent 24:14 79:15	issued 14:6 20:2 22:19 23:2 24:2,19 71:10,11 90:8 108:5	
handle 57:8 103:15 130:10	impact 14:10 52:20 60:13 122:8	information 9:7 32:5 36:16 57:10 87:5,14 103:16 115:13 118:5	issues 6:10,16,18 7:8,9,17 12:14 29:9, 10 51:15 91:8 98:21 116:9 138:6	
handout 129:4 130:10	implement 10:7 11:3 46:8 50:20 77:17	infrastructure 28:7 136:21	issuing 21:8	
hands 12:4	implementation 9:21 10:23	inherited 92:18	item 26:23 57:16 136:12	
happen 10:20 57:19 77:21 100:3 108:17	implemented 8:21 9:17	initial 77:7 129:23	items 28:3 33:19 58:4 68:14 136:18	
happened 66:10 77:20 108:16 118:3 122:13	implementing 13:11	initially 97:15 110:2	<hr/> J <hr/>	
happening 50:17	implication 19:11	inquired 102:16	January 19:21 22:22 23:4 63:15 66:22 72:10 75:13 76:5 93:10 99:17,22	
hard 56:5	important 22:7 114:9	insight 45:20 107:14	job 96:22 127:10	
harmed 41:3,19	impression 113:3	inspected 32:11	joined 4:3	
harming 41:12	impressio 113:3	inspection 17:4 24:21 25:5 32:8,9 33:14 48:1 78:11	joint 4:14 13:17,22 14:2,14 15:4,9 16:18,23 17:3 18:7, 12	
harmless 25:14 135:22	imputation 79:8 107:21 112:9 126:16 135:21	installed 58:8	Josh 11:16	
head 124:10	impute 63:9 64:18 90:6 117:22 121:7	instance 63:10 119:21	Joshua 2:6 12:5 15:23	
hear 107:6	imputed 25:11 26:12 58:2 63:18,21 64:6 66:13,23 67:18 69:2 79:7 89:16 107:1 111:12 118:14,15, 18,22 119:3 120:16 131:5 132:14 135:8	instances 89:1 101:9	July 22:17 35:8 67:15 85:11 90:9 94:23 98:4 113:19 114:21 134:23	
heard 62:5,15 66:12, 19 70:10 86:3 88:16	imputing 110:19 118:13	intend 39:14	jumping 55:17	
	inappropriate 115:1	intent 136:6	June 19:13,18 20:3, 21 34:10 35:12 36:2, 7,20 45:11 48:17 49:20 50:12 75:17	
	include 8:22 31:20 32:23 63:21 66:18, 19 77:6 90:6,7,17 99:13,14 101:14,16 104:10,21 109:14 125:20 127:16,21 131:8,23 136:11	intention 57:12		

lead 55:5 59:11 66:3
leading 16:4
leaned 5:6
learned 99:8
leave 124:19
left 11:15
legal 58:23 59:7 63:4 116:8
Letourneau 2:6
 11:16,17 12:5 15:20,
 23 16:1,4,22 17:2,9,
 12,15 19:5,9,16 20:8
 21:3,16 22:23 23:9
 26:15 27:1,17,22
 28:12 30:2,6,9,15
 31:1,7,16,23 32:4
 33:7,13 35:5,10,15,
 19 36:3,10 38:18,21,
 23 39:6,16 43:8,11,
 23 44:3,11,18 45:6
 47:6 54:1,13,23
 56:4,17 67:12 68:12,
 16 69:7,9 70:2,7,17,
 20 71:9,14 72:4,12,
 16,22 73:14,21
 75:11,15,22 76:8,17
 112:16 115:19
Letourneau's 113:14
 114:5 115:14 116:3
level 120:17
liberty 97:20
light 11:23 12:1
limit 6:17
limited 6:15 78:18
limiting 29:9
list 4:15 32:4
live 133:22
located 22:3 76:15
 135:1
longer 29:6 135:4
lookback 23:22
 66:11 78:18 135:16
loosely 119:8
lose 71:8
lot 34:5 55:22 56:2
 97:12
lower 42:10 48:23
 50:1,4,6 75:19 86:23
 107:22
Ludwig 2:21

M

made 41:19 62:7,14
 82:4 83:11 89:23
 92:23 97:19 98:2
 109:19 114:12
maintenance 32:12
majority 45:17
make 6:2 7:6 10:16
 17:10 18:22 27:5
 37:15 38:23 43:2,23
 44:12 69:15 82:2
 93:22 104:16 114:7
 117:3 121:22 130:9
 135:3

makes 8:21 58:12
 95:9
making 41:11,18
management 17:20
 18:1,15 48:3 51:7
manager 14:22 16:1
 17:20,22
manner 6:22 96:15,
 17
manual 39:9,11 43:6,
 15 46:15 54:16,23
 55:21
March 67:23 68:21
 90:1 118:6
marked 13:19 15:6
 16:20 18:9 19:8
 81:21 106:21
matches 86:21
material 14:9
materially 60:15
materials 13:23 17:7
 18:13,19
math 64:15
matter 4:13 79:7
maximize 111:9
maximum 12:13
meaning 24:11 56:10
 116:10
means 87:6
meant 30:12 137:23
 138:1
mechanism 4:8 25:7
 54:18 57:16 58:18
 77:23 78:15 80:12
 108:14 111:16 121:6
 136:6
mechanisms 13:15
 78:16
megawatt 4:8 5:8,11,
 14
mention 42:22 95:23
 105:18
mentioned 35:20
 52:1 61:3 92:5
methodologies
 86:13
methodology 24:12
 85:18 86:7 88:15
 107:5,9,15 110:3
 119:20,21
methods 72:13
mic 31:7
million 34:9 48:2,3,5,
 7,12,22 50:1,4,5
 85:21 88:23 90:4
 101:9 118:17
mindful 84:5
minor 14:12 15:13
 53:3 86:11,12
minutes 65:15,19
miscalculated 5:14
mismatch 79:4
 135:18
misspoke 138:3

mistake 130:19
misunderstanding
 114:8
mix 109:9
mixed 63:3
modification 137:13
modified 39:7 54:14
moment 60:16 64:14
 82:11 84:14 97:19
 123:18 128:11
moments 86:2 93:11
Monday 133:2
 137:18
money 77:13 78:22
 80:8
month 37:10 38:1
 50:12 56:13 67:18
 68:3 69:1 80:4 86:9
 87:9 92:9 93:1
 107:11 120:7,8,9
month's 86:10
monthly 85:14 98:6
months 11:1 19:13,
 18 20:20 35:8 36:9
 54:4 66:17 67:17
 68:2,9 75:17,20
 76:13 85:14,20 88:6
 97:23 98:8 110:5,8
 112:21 113:19
 120:2,10 122:2,6
 131:15 134:12
morning 4:2,5 19 5:1
 7:20 8:3 15:23 17:19
 28:19 53:12 82:7
 84:19 88:17 89:5
 93:6 95:23 99:13
 100:5,20 101:3
 102:19 105:7 113:4
 115:14 133:22
 136:14
morning's 19:8
move 8:1 10:22
 11:10 51:16,20 62:2
 71:1,5 76:19 77:13
 91:20 100:15 106:17
 127:13 128:8,18
 130:14,19
moves 94:5
moving 27:6 32:7
 56:19 128:20
multiple 63:20 76:3
multiplied 85:19
multiply 98:6

N

narrow 59:9
nature 59:15
necessarily 118:18,
 22 123:8
needed 9:22 21:19
 56:6
NEM 57:8
net 49:9
netting 58:12 103:13
newbie 16:17

newly 58:8
Nixon 127:18
nodding 83:20
non-cci 43:10 83:7
Nonetheless 89:7
 101:11
normal 96:22
notation 33:1
note 5:5 6:19 8:5
 14:4 40:11,23 50:11
 134:2
noted 8:10 14:6
 23:10 41:17 46:12
 55:21 73:15 102:6
 106:22 135:4
notes 68:13 86:5
noticing 117:8
notwithstanding
 74:4 90:15 111:14
 134:16
November 10:23
 34:11 68:17 71:11
 84:22 86:16 89:2
 117:9 119:2 121:19
 122:3
November/october
 122:1
nuances 96:16
 119:18
number 10:9 29:16,
 22 30:12 32:11,19
 38:13 46:13 47:11
 66:17 69:18,19
 76:13 83:9 85:6,7
 86:4,6 87:8,13 89:20
 98:11 100:5,12
 102:9 105:3,7 107:3
 113:6,10 118:17
 119:23 120:2,10
 122:2,4,6,11 123:12,
 19,20,23 125:7
 126:17,21 127:4
 129:21
numbered 98:18,23
 102:11
numbers 30:21 47:17
 70:8 82:6 97:12,13
 98:14 118:13 126:10
 127:21

O

O&m 29:13 30:4
 31:23 48:1 57:20
 58:6,16 103:14
 131:19
objecting 114:2
objection 129:17
objections 83:23
 84:2 128:20 129:1,
 15
obligation 111:8
observed 97:13
obtain 27:19 28:2
 59:20 136:16
obtained 59:20
occasions 73:7

occurred 21:10
 135:13
October 4:11 9:21
 10:7,13 11:3 34:19
 41:9 47:17 49:12
 66:9 67:16,22 85:12
 90:10 117:6,20
 121:8,9,19 122:4
 134:7 137:23 138:3
offer 95:20
offered 101:15
 126:23 134:16
offering 132:12
offset 27:21 28:3
 33:19 42:8 49:7
 136:17
offsets 42:4 49:23
one-month 68:22
one-third 45:19
one-year 134:6
open 9:6
opening 2:4 6:3,6
 7:6,13
operational 16:9
operations 16:2,7,11
opinion 23:5,10
 25:14 26:13 27:18
 59:7,9 60:6 91:14
 116:10
opportunity 6:2 8:20
 58:15 63:5,23 64:5
 65:3 70:16 101:23
 102:4 121:17
opposed 131:11
optimal 10:16
optimistic 88:4
order 9:13 10:6,19
 11:4 27:19 28:1,9
 29:8 54:18 100:3
 103:13 132:3,19
 136:23 137:5,18
organization 29:8
originally 99:14
 125:23
originates 102:10,11
ostensibly 122:5
outstanding 37:10
 38:2 45:23 46:4
 94:18
overdue 85:6,14,22
 122:2,5,8
overriding 64:17
oversee 16:8
owe 45:13
owed 36:1,8,14 42:23
 45:17 131:13
ownership 109:12

P

p.m. 138:13
paid 20:14,17 21:2
 22:21 23:1 25:19
 26:5 66:16 67:4 74:5
 76:2,6 90:11 93:15
 105:1 109:4 110:17

117:21 118:6 135:9 136:4	period 19:22 20:3,12 22:16 24:16 98:4 99:23 100:1 110:12 121:12 134:6,21	69:16 71:20 81:15 90:12,13 110:13,14, 22 125:1,10 126:1,6, 9,15 128:6 131:1	primary 25:1	quantify 69:10
Panel 2:6,8	periods 20:6,18 22:6 23:8 46:14 77:10 79:23	positioned 94:14	prime 79:1 80:11	question 10:5 21:12 30:15 31:8 36:3 37:16,18 39:2,17 40:2 43:11,19 44:19 51:23 55:15 56:21 58:23 60:1,20 61:3 62:11 63:8 66:1,4 73:23 91:19 112:16 115:8 118:2,7,12 121:11 123:10 124:14 136:13
paper 85:2 127:17 128:22	permission 51:18	positions 9:1,9	prior 6:3 7:10 22:2 29:15 32:10 48:10 50:17 75:9 128:19	questioning 7:23 55:3 59:1 60:8
Paragraph 98:19,23 102:11	permits 103:13	possibly 64:15 131:14	privy 45:6	questions 2:11,17 51:8,20 53:7,9 65:11 91:15 115:22 116:6, 17,21 124:22
paragraphs 98:18	personal 27:7	post-cci 57:8,21 103:14	pro 77:13 79:18 124:4 126:23 134:17	quick 50:9 68:7,13
parameters 102:23	personnel 27:8	post-closing 20:18 21:18	proceeding 14:11 130:3 138:12	quickly 60:19 65:1 70:7 105:12
part 10:4 13:18 15:5 16:19 18:8 40:6,10 49:6 54:7,8 55:14 56:23 57:3,11 58:1, 16 103:19 128:3	perspective 24:12 40:1 74:1 79:13 137:21	post-hearing 84:8	process 21:19 39:12 43:6,16 46:16 50:23 53:22 54:19 55:21 89:10 102:17	quoted 104:8
parties' 4:14 128:6	pertained 98:4	potentially 112:9	produce 104:1	quotes 118:15 119:3
parts 16:23 18:12 22:5 124:9	pertains 82:20 83:5 124:7	PPAM 3:8 4:8 6:12, 21 8:8,11,13,15,16 9:12,14,19 14:8,13 15:15 20:22 21:6 23:10,20 24:4,9,13, 17,22 25:6,9,18 26:4,8,10,18 27:21 28:3,4,14 29:8 39:22 40:10,19,20 41:23 42:1,5,8,9,12 47:11, 16,18 48:9,14,21 49:16,22,23 50:15, 21 51:2,8 52:4,15,18 53:1,4 56:16 57:13, 16 58:3 60:23 63:9 64:9 66:7 73:5,10 74:17 77:14,23 80:12 90:23 91:1,9 93:14,21 94:4,12,16 95:2,6 100:23 102:23 104:3,12 108:7,10,20 109:15, 17 110:10,21 120:13 125:21 128:4 131:20 132:4,10,17,22 133:19 134:5,6,13 135:8,12,14 136:2,6, 10,18,19 137:6,11	produces 84:23	<hr/>
passed 85:8,10	petition 3:3 6:8	PPAM's 78:14	producing 102:20 103:22 104:6	R
passing 41:13	phases 95:2	practice 8:21 9:3 19:20	production 104:11	RA 52:8
past 10:13 67:17 94:11	physical 131:19	pre-file 6:13 18:5	productive 9:6	raise 12:3 81:6 91:8 93:22
past-due 71:21	picked 40:10 124:15	Pre-filed 3:4	program 12:1 17:4 18:2	raised 7:17 19:7 56:22
pause 68:7 70:21	picking 123:9	preexisting 92:15,17	project 78:17	raising 124:17
pay 20:6 96:14,17 106:2	place 54:2,20 121:6	preface 66:5	projects 16:2,6,11	ran 68:13
payable 63:15	plan 18:16 94:10	prefer 65:7 114:19 129:11	proof 62:22	rate 3:8 4:8,10 5:8 10:10 14:10 15:2,15 18:6 20:22 23:11 24:4,22 25:1,6 26:4, 8,18 28:4,14 32:13 33:5,10,12,22 34:2 47:15 48:14 50:15, 21 51:2 56:16 58:20 60:23 66:8 77:23 78:15,16 79:1 80:11, 12 85:15 94:4,5,22 95:5 104:23 108:10, 14 109:17 133:19,23 134:6 135:12 136:6, 8,10,19 137:11,12
paying 20:10 121:2	plant 4:7 13:14	preference 7:19	proper 120:16	ratepayer 96:13 112:3
payment 23:4 24:5, 15 25:15,17 37:5,8, 20 38:11,14,16,20 39:20,21 40:17 41:21 42:18,22 43:5, 14,18 44:9,16 45:1, 17 47:4 48:19 49:21 53:13,16 54:3 55:4, 11,18 61:6,13 65:13 66:21 67:14,15,18, 22,23 68:2,19,21,23 69:1,17,21 74:15,16 77:1 82:16,20 83:5, 12 85:3,9,11 86:19 89:6 90:9,22 91:21, 22 92:4 93:23 96:7 104:21,22 118:3 120:1,6 121:12,15 122:13 131:5,9 135:22 136:1	point 55:19 57:22 61:4 62:20 65:13 72:18 89:22 93:5 114:6 115:20,22 116:12 117:18 121:14 124:17 127:7	prepare 13:17 81:20	propose 14:11 122:10	ratepayers 48:8 62:10,13 88:21 89:8, 17 90:3,19 96:7,10 106:1,11 110:6,23 111:11
payments 20:10,23 21:4 24:10 37:12,23 38:4 39:4 56:7 67:9 76:3 83:13 88:5 90:1 96:2 105:20 110:17 113:22 121:1 131:5 134:15	pointing 121:18	prepared 13:23 15:10 17:8 18:20 46:6	proposed 4:15 6:20 9:12 28:14 53:3 61:1 91:13 103:3 108:20 109:1 125:20 132:17 133:20,22 137:11,13	rates 13:15 14:22 15:3 28:8,15 41:8 42:13 49:17 52:20 56:10 60:13,15 78:23 94:17 132:10, 18 136:22 137:15
penalty 85:22	points 7:21	preference 7:19	proposes 4:10	read 57:23
percent 15:16 25:19 37:10 38:1 67:17 68:3 69:1,2 80:4,6 85:15,20 92:8 93:1 136:3	pole 4:7 13:14 17:3,4 19:13 21:7,14 22:11, 12,15 24:7,18,21 25:4,21 27:9 28:7,11 29:12 30:3,7,11,13, 19,23 31:6,14,20 32:1,12 33:4,5,10, 15,16,18,20,23 34:1, 8 37:6,13,20 38:5 40:17,19,20 41:13 43:1 47:4,9 48:5 49:6 54:8 58:5,9,11, 13,16 59:15 61:14 63:13 74:2,10,22 78:10 83:6,7,9 85:17 87:2,17,20 88:1,19 89:3,13 92:12 97:6, 10 98:8 99:15,18,21 100:7,18 101:6 102:14,21 103:12,22 108:21 110:4,7,18 124:1,7 127:3 134:11 136:7,21 137:2	pre-filed 3:4	prorated 20:11 76:11,12,13,20 79:20 109:2,6 112:18 113:16 127:1 134:19	reading 30:5,21 59:9
perfect 70:22 73:3 82:8 95:9 120:21 138:4	pole-related 23:12	preexisting 92:15,17	provide 6:1 7:15 21:13 64:16 83:18	ready 12:10 64:14 81:11
performed 18:16 86:3 93:17	poles 18:17 21:22 22:3 27:2 29:15,16, 19,22,23 31:22 32:3, 11 33:21 34:2 53:20 58:8 76:15 91:11 109:13 131:21 135:1	preface 66:5	provided 4:13 9:7 36:16 83:8 85:4 87:6,14 100:5,13 103:9 105:7 118:5	real 68:7
performing 96:22	portion 36:11 39:21 41:23 42:1 76:14 84:14 86:23 87:15 113:16 134:19	prefer 65:7 114:19 129:11	provision 17:23 88:21 90:4	realistic 71:22
	position 7:8 62:9	preference 7:19	provisions 59:10	realize 97:22
		prepare 13:17 81:20	Public 4:20	realized 88:5
		prepared 13:23 15:10 17:8 18:20 46:6	purpose 31:5,14	
		presented 119:17 138:6	purposes 14:15 93:20 106:22 108:7 125:2 131:7	
		presenting 11:12	pushed 6:23	
		presume 86:7	put 31:7 120:15	
		pretty 131:1	puts 65:4	
		previously 16:13 18:3 23:10 27:12 66:7 71:15 73:17 74:20 76:1,18 108:11	putting 120:14	
		price 33:15	<hr/>	
		primarily 58:23 75:18	Q	
			quantification 62:16, 19 63:2 65:3	

realizing 7:4	14:20 15:22 17:18	remains 123:10	resulted 27:12 39:7	S
reason 43:13 73:2 111:3	62:1,3 65:21,23 81:3 103:9 114:6 115:16 116:13 128:21 129:13 130:4,10 133:21	remedy 111:23	54:15 98:9 101:5 134:3	
reasonable 9:20 28:16 46:21 91:5 106:3 109:22 132:11,18	recorded 26:19 85:3 89:7	remember 94:13	resulting 9:19	sampling 14:6 52:7, 12
reasoning 94:13	records 21:20 22:2 31:3,11 34:19 57:10 103:16 132:1	remove 26:17 60:21 91:5 103:4	return 10:2 63:6 65:20 66:1 71:9	sanguinely 119:12
reasons 62:8 63:20 64:3 111:5	recover 31:4,12 48:8 54:3 57:13 61:13	removing 105:3,10	reveal 110:2	scenario 121:1
recall 112:23 113:2	recoverable 30:3 48:7 49:23	repeat 30:15 31:8 36:3 37:17 39:2 43:11 69:15	revenue 8:11 13:7,11 24:8 25:9 26:10 33:17,20 34:8 39:21 40:6,10,19,20 41:23 42:4,7 45:10 47:10, 22 48:17,18 49:6,7, 21,22 53:17 55:3,5 58:10 61:4 63:10 64:8 66:14 73:10 74:10,17 77:5,14 79:7 87:18 88:19 97:6,13,22 98:8 99:15 100:15,17,18, 23 110:7,21 111:9 118:14 124:1,7 131:13 134:4,14 135:8,15	schedule 33:1 99:16 100:17
recap 114:4	recovered 52:18 57:16 58:17,19 134:5	repeated 86:14	Revenue-related 102:14	Scott 2:7 11:20 12:7 14:21
recapping 114:18 133:10	recovery 6:12 13:13 25:2 137:3	replaced 29:17,22,23	revenues 17:5 21:7 23:12,13 24:18 27:20 28:2 33:18 35:12,16 36:1,6,19 41:14,15 48:6 49:20 58:11 59:16,20 63:13 74:3,22 91:2 97:10 100:7 101:7 103:12 108:8 110:5, 12 136:17	section 104:8
receipt 41:15	recreation 127:18	replacement 24:21 25:5 29:13,15 30:4,7 31:21 58:6,16 78:10	review 52:10 65:3 109:23 133:5 137:10	sections 17:2 18:14
receive 21:19 35:5 55:4 77:1 97:18 110:23 111:12	red 11:23	report 14:6 52:12	reviewed 92:11 99:6 22 97:9	seeking 31:4,12 48:8
received 17:5 20:13 21:4 24:5,10 26:7 27:4 32:5 34:14,16, 17,18,19 35:4,21 36:5,11,19 38:11 44:7 45:9 49:6 52:11 67:2 74:2,15 85:12 89:6 90:1,9 91:10 101:10 105:20 115:2 118:19	redirect 2:9 60:4 65:12 71:2,5,6 127:13 128:9,12	represent 30:13 38:12	revising 6:7 92:6, 22 97:9	seeks 4:7
receives 24:15 40:7	redo 122:23	representing 4:20 20:16	revised 107:19 117:16 126:15 129:10	selected 52:9
receiving 20:9 97:22	reduce 25:9 26:10 66:14	represents 30:22	rights 105:19	send 36:15 103:22
recent 18:6	reduction 6:12	request 62:1,3 94:9 103:9,19 115:16	risk 51:5 74:9 111:15	sending 35:13
recess 65:22	refer 104:5	requested 8:12	role 13:9 14:23 16:3 17:22	sense 8:22 54:12 56:3 95:9 97:20 119:9 120:11 124:6
recognize 44:20 50:16 77:4	reference 58:12 102:12 103:11	requesting 42:10	rough 87:10,11 123:15	separate 73:6 83:9
recognized 40:4	referenced 27:12 73:8 74:20 76:2 112:17	requests 37:3	roughly 45:14 80:5	separately 33:22 55:10 130:10
recognizes 40:9	references 33:1	required 10:14 26:17 27:9 90:16	round 48:5	separation 91:21
recognizing 41:11	referred 85:23	requirement 25:10 63:10 64:8 66:14 73:11 74:17 77:15 79:8 110:21 134:4, 14 135:8	rounded 85:13	September 34:10 67:20 81:21 84:21 86:15 87:9 88:4 89:1 117:4 119:2
recommend 9:14 97:4 105:3,10 132:19	referring 129:22	requirements 13:7, 11 16:10 26:11	rounding 120:7	service 4:20 13:13 15:2 21:23 22:4,12 76:16 135:2
recommendation 105:2 113:8	reflect 129:20	requires 50:7	rows 84:15 122:15	session 97:16
recommendations 6:11 7:2 19:6 46:20 51:6 100:21 102:6 104:17,19 105:16 107:19 117:16 129:9 132:7 134:8	reflected 55:6 61:14	reserve 91:7 105:19	rows 84:15 122:15	set 71:16 128:14
recommended 3:8 8:9,23 25:10 26:11 29:11 34:5 82:9,13, 19 83:2,4 89:20 93:19 97:8 98:10,13, 22 102:7,8 104:20 132:9,16	reflects 29:21 118:23	reserving 93:22	rows 84:15 122:15	sets 129:8
recommending 97:21 127:23	regulatory 13:12,14 81:18	reset 56:10	RRA 14:5,8,12 18:6 25:7 52:3,15,18 53:1,4	settlement 110:1
recommends 26:16	reiterate 49:2 105:23	residential 96:10	ruling 65:1	share 84:17
reconcile 94:11,18 95:7	relate 82:15 101:16 105:21	resources 27:8 39:10	running 20:3	shared 54:11
reconciliation 13:14 25:3 40:13 41:10 50:23 79:1 80:11	related 15:2 18:16 21:6 29:9,10 32:3 46:10 47:4 58:11 82:22 87:3 90:7,22 91:11 98:21 100:6 102:19,20 110:9 113:5,19 134:5 135:14 136:7	respect 18:17 20:20 23:16 134:8 135:1,6		sheet 84:13
reconciliations 134:3	relates 42:18 43:17 58:7 77:10 87:2 91:1 108:7 109:12	respond 6:6 57:4 58:15 63:5 123:16		short 112:5
reconciling 78:3,16	relationship 112:2,3, 4	responded 94:8		shortened 85:13
record 11:14 13:4	relative 62:6 66:2 83:13 105:20	response 31:17 37:5, 19 38:9 42:21 43:4 45:13 55:14 83:7 85:5 87:15,22 97:19 103:10,19		show 5:10,21 34:9,19 84:15 121:3
	relevant 123:23	responses 37:2 103:10 124:19		showing 70:15 97:14 122:7
	remain 24:11	responsibilities 13:8 14:23 16:3 17:21 96:23		shown 83:13 87:16 98:1 101:5
	remained 87:23	responsible 13:10 15:1 16:4,9 17:1,2, 23 18:13,14		shows 29:22,23 30:3, 20 33:5 34:21 38:9 47:12 88:19 89:19 117:9 118:4 122:9
	remaining 72:1	responsive 60:20		sic 87:8 137:5,12,16
		rest 12:15		side 5:5 78:22
		result 8:10 9:18 22:14 25:15 28:15 86:17 92:19 109:16 132:18 135:23 137:7		sides 62:21
				significant 21:18 49:14 100:2
				similar 25:7 86:3,17 93:23 122:23
				simple 82:21 83:19 85:18 98:9 113:7 119:22
				simplest 103:20

simplified 78:15	static 32:4	81:9	116:3 125:14 126:3 133:9,22 134:10	topic 42:18 60:7 130:20
simplifying 92:23 98:3	stating 57:2	symmetrical 41:10, 18	thing 83:21	topics 51:13 61:21 128:7
simply 85:7,19 87:10 88:3 98:5 120:13	stay 42:17 130:20	system 39:6 44:4 46:16 54:14 61:17 71:17 99:1,3,4,5	things 109:11	total 20:19 24:3 30:3 31:3,9 35:23 36:12, 13,17 42:9,12 45:14 49:23 69:3 70:6,21 83:1 86:18 87:16,21, 23 88:6 100:6 102:1 119:23 120:10,14
single 34:2	staying 34:21	systems 100:15 106:8	thinking 120:18	totally 11:23 91:13
sit 45:20 47:6	stem 9:1		third-parties 46:4	totals 47:18
sitting 77:19	step 123:3	T	third-party 17:6 19:11,17,21 20:2,10, 15,20 21:1,20 22:8, 15,20 23:3,7,18 24:1 25:12 26:2 27:3,13, 20 28:2 33:18 34:23 35:4 36:1,7 42:19 43:1,9,10,18,20 44:1,4,13,23 45:3,7, 10,13,18,23 46:7 47:3 48:19 53:19 54:10 57:9 59:21 62:18 63:21 66:20 69:17 71:16,21 73:8, 15,20 74:5,14 75:9, 13 76:12,14,20 79:6, 17 83:6 87:2,20 88:1 89:3 91:23 92:12,22 93:2,8,13 97:6 99:15,18,21 100:7 102:21 103:16 108:4 109:3,18 112:19 113:17 114:11,21 124:7 127:3 131:4,6, 10 134:20 135:10 136:17	touch 51:7 117:19
situation 120:14	Stephen 2:14 3:6,8, 10 5:4 81:4,8,17		thought 68:8 70:9 71:8	Touche 14:6 52:9,13
six-month 19:22 98:4 99:23	steps 10:10	table 3:7,10 29:20 33:2 34:7 83:3,8,14 86:21 88:8 98:13 101:18 118:4 125:19 127:5,19,21,22 128:23 129:11,20 130:6 133:8	tight 137:20	town 22:5
skip 12:18 125:9	Steve 127:5	takes 111:13	time 10:8,15,20 11:13 14:3 15:12 16:15 17:11 18:23 20:1 21:19 22:6 23:19 25:20 26:4 27:8 30:16 31:8 33:23 34:3 36:3 39:11 43:12 46:10, 14 55:22 56:2,3,5,6, 9,14 63:13 64:21 65:17 70:19 73:12 74:4 78:22 80:7,22 82:2 97:19 110:12 114:20 121:8,9 123:1 132:2 136:4 137:8	track 110:9
skipped 48:2	stragglings 109:20	taking 4:16 7:10 74:8	time-consuming 39:9 54:16	tracked 33:21 61:5
slight 124:2 134:5	strand 13:13	talk 42:17 58:20	timeframe 38:7	tracking 27:2
slightly 51:5 129:20	strange 11:22	talked 48:16 54:5 91:21 134:18	timely 6:22 96:15,17 134:1 137:14	tradition 12:12 130:20
slip 10:13	streamlined 54:19	talking 56:12 66:8 67:1 95:11 112:11 115:5 122:15 123:3 126:22	times 85:20 103:8	traditionally 130:16
small 96:10	stress 123:14	target 11:7	timing 22:18 23:5 127:15 134:14	train 71:8
smaller 75:19	stricter 104:12	tariff 59:4,10 112:4 137:6	title 13:5 14:19 15:21 17:17	transaction 19:14 25:23 35:18 57:12, 18,21 92:20
sort 5:16 77:12 78:21 85:2 101:13 109:8 110:11 118:9 119:7 133:11	strictly 77:22	tariffs 106:6	today 4:3 5:3 11:13 12:12 15:18 17:13 19:2 50:8 62:1,6 80:22 88:12 89:23 96:19 97:13 99:10 100:13 104:14 113:14 121:21 126:3 127:11 128:17 129:4 134:10,18 138:9	transcripts 127:16
sorted 53:21	stuff 58:20	team 16:7	today's 14:15 64:9	transfer 29:13,18 30:4,8,10,14,18 31:19 32:1 37:21 57:9 58:6,7,17 85:17 103:15 108:21 110:1
sorts 95:2	subject 7:22 37:9 38:1 42:2 55:7 60:8 61:9,22,23 62:2 64:8 78:23 96:7,14 106:1 112:9 130:9	tech 102:6	top 122:16	transferred 48:1 131:15
sounds 84:10	submit 84:8	technical 3:5,10 6:9 7:18 19:7,10 26:16 36:23 81:20 82:2 88:9 97:4,16 98:18 99:9 103:2 104:9 134:9		transferring 131:20
sound 92:19 116:3	submitted 14:10 18:5 37:3 52:21 137:6	tells 70:13		transition 21:18 54:6 73:18
speaking 5:6	submitting 121:23	temporary 94:22		transparent 31:16
special 109:9	substantial 46:11	tend 60:6		treated 9:10 92:4
specific 25:6 74:22 107:13	substituting 113:9	term 119:9 121:6		true 42:3 61:11
specifically 58:5,7, 10 113:2	successfully 105:11	terms 25:23 64:10 88:14 103:20		Tuesday 137:18
speculated 107:4	sufficient 10:15 65:15,19 111:23 137:20	territories 22:4		turn 19:5 23:15 26:15 28:23 53:9 65:12 97:3 102:10 116:16 126:7 133:16
spend 34:3	sufficiently 116:13	territory 21:23 22:13 76:16 135:2		turning 14:18 15:20 17:16 21:12 33:16
spent 5:11	suggest 11:2 58:22 89:18 103:1	testified 16:13 18:3 59:19 64:3 71:15 73:17 76:18 89:4,5 99:12 102:18 108:11 112:16 113:15 114:7,18 136:14		twelve-month 100:1
splitting 118:10 120:19	suggested 66:6 93:11 113:9	testify 47:1		two-thirds 45:14
spreadsheet 83:19 86:20 87:1 88:8 106:20	suggesting 111:3	testifying 16:15 113:1 114:3		type 112:2
stakeholders 16:8	suggestion 127:14	testimony 3:4 6:3,14, 17 7:10,22 11:10 12:22 13:17,22 14:3, 14 15:4,9,14,18 16:18,23 17:3,7,11, 13 18:5,7,12,19 19:2 35:7 36:10 41:4 46:12 66:18 88:17 90:15 93:5 96:19 100:20 101:2 113:4, 14 114:5 115:14,20		types 59:2
stand 47:7 65:5,8 69:11 81:1 129:6	suggests 54:7 69:18 129:19	testify 47:1		typo 15:13
standard 92:14	summarize 82:17 97:7 102:8 104:16 122:12	territory 21:23 22:13 76:16 135:2		U
start 4:16 11:15 13:3 49:11 57:5	summarized 7:7 82:13 131:1			ultimately 8:12,23 26:5 52:16 78:2 79:21 118:13 123:13
starting 11:11 82:14	summary 7:15 12:18			unable 10:19
starts 42:14 48:12	sundry 39:6 54:14			uncollected 88:1
state 11:14 14:19 15:21 17:17 73:20 81:3,15	supplement 57:6			underlying 25:4
stated 36:11 115:17	support 16:2,7,12 17:23 81:18			understand 39:18 43:2,19 54:9 58:21 64:22 69:12,16
statement 2:4,20 3:6, 10 6:3 7:6,13,18 19:7,10 26:16 36:23 49:1 50:2,10 55:9 58:4 61:16 81:20 82:2 88:9 97:5 98:19 99:9 102:7 103:3 104:9 134:9	supporting 13:18,22 15:5,9 17:7 18:13,19			
statements 6:6 128:19 130:14	supports 133:19			
	suppose 10:22 65:5 84:9			
	supposed 36:14			
	survey 34:1			
	suspect 60:4 82:4			
	sworn 2:8,15 12:8			

75:18 76:9 99:23
 100:4,13 107:17,18
 110:13,15 120:22
 126:14 129:7 131:19

understanding 6:5
 27:22 32:21 35:6
 40:5 46:2 55:8 56:18
 57:7,11 61:8,9 72:14
 94:15,20 96:3,6,12
 99:20 100:19 102:22
 113:3 115:18 119:18
 125:13 126:2

understands 128:6

understood 53:15
 61:7 130:4

unfortunate 106:7

unified 34:2

unit 33:15

unlike 78:15

unpaid 24:11 25:11
 26:12 88:1 135:10

unraveling 100:3

unreasonable 72:4
 93:19

upcoming 82:5

update 39:14 99:10
 105:6

Updated 3:9

updates 14:2 15:12
 17:10 18:22 88:12

updating 104:20
 132:8

upfront 32:9,13,17,
 22

upper 84:14

upwards 35:21

usual 51:1

utility 5:4 22:4

V

varies 75:22

vegetation 17:20
 18:1,15 48:3 51:7

vendor 56:10

version 129:3

versus 107:9

view 46:13 62:20
 63:19 64:6,17 65:13
 66:23 111:13 129:3
 137:4

views 62:5

violate 116:7

visual 83:18

volunteer 116:10

W

wait 50:22 122:14

waiting 120:13

walk 83:21

walking 88:11

wanted 5:7,8 6:4
 31:16 41:21 43:23

44:11 53:6 69:10

warrants 135:20

week 7:18

week's 10:15

weighted 80:15

Wiesner 2:8,9,16,22
 4:18,19 7:12 10:2,8
 11:2,6 12:10,17,21
 13:2 28:18,22 51:14
 58:22 59:8 63:3,7
 65:6,16,18 66:2,5
 67:11 69:15 71:5,7
 80:18 84:2 94:19,21
 95:10,13 106:17,19
 114:2,4 115:9,13,21
 116:2,5 123:21
 126:8,13 129:2,19,
 21 130:16 133:17,18
 138:2

wild 120:3

wind 119:11

witnesses 7:15,21
 11:13 59:1,18 60:9,
 11 62:4 63:6 65:8
 66:3 67:5 80:21
 84:16 86:3 101:3
 108:11 134:10

wonderful 95:16

wondering 31:5,13

word 104:4 118:21
 124:4

wording 103:5

words 57:18 120:21
 126:9

work 18:16 22:7
 27:2,7 51:1,2 59:22
 85:2 90:17 99:20
 120:6,7 130:6
 133:11

worked 44:3 99:1

working 5:20 78:21
 130:7

works 73:4 108:10

world 120:21

worry 12:14

worth 43:7 98:12
 127:9

wrap 65:11

wrapped 124:10

written 14:15 15:18
 17:14 19:3

wrong 5:22

Y

YC-SRA-JDL-IJF-4
 26:20

year 4:9 8:15,17,18
 19:15,22,23 21:3,7,
 10 23:13,22 24:15
 29:16 32:10,14,17
 34:15 41:7 47:16,20
 50:17,22 66:10 67:9
 68:2,23 72:3,19
 78:18 79:21,22 91:3
 94:1,5,11,17 95:1,11
 105:20 108:15,18
 110:10 112:10,20

114:16 115:3 118:9
 120:17 123:1 134:3
 135:15

year's 8:7 14:12
 53:1,4 91:9 93:14,21
 94:12 100:23 105:4,
 5 109:14 132:10

Years 32:13

yesterday 5:12

Yi-an 2:7 11:19 12:6
 13:6