

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 24-115

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
d/b/a EVERSOURCE ENERGY

Petition for Approval of the 2025 Lost Base Revenue Rate

EVERSOURCE MOTION TO AMEND PETITION AND RESCHEDULE HEARING

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) hereby moves to amend its petition in this docket to remove the energy efficiency (“EE”) portion of the System Benefits Charge (“SBC”) rate from this docket and move it to Docket No. DE 24-113 so that the lost base revenue (“LBR”) component of the SBC can be evaluated alone in this docket. The Company also moves to amend the petition to seek an effective date for the LBR rate of February 1, 2025 or the 1st of any subsequent month should the Commission desire additional time beyond February 1 for review and consideration, and respectfully requests that the Public Utilities Commission (“Commission”) reschedule the hearing currently scheduled for December 26, 2024 for some time after January 1, 2025. In support of this motion, Eversource states the following:

1. RSA 374-F:3, VI-a(d)(2) requires that the EE component of the SBC be adjusted each year on January 1 according to the consumer price index, and as calculated and determined by the New Hampshire Department of Energy. Adjustments to the LBR portion of the SBC have no such timing obligations. However, since the EE filing had to be made, the Company thought it would be most administratively efficient for all parties to consolidate the EE and LBR into one filing for review and approval by the Commission. Since December 1 fell on a Sunday this year, the

Company filed on Monday December 2. Because of the EE January 1 effective date requirement, the Company requested that both rates be approved via order *nisi* by December 20, 2024.

2. On December 11, 2024 the Commission issued a Notice of Adjudication and Notice of Hearing, scheduling a hearing for this docket for 9 a.m. on December 26, 2024 so that it could deliberate and issue an order by December 31, 2024 for a rate effective January 1, 2025. In scheduling the hearing, the Commission cited to last year's practice of having a hearing to approve the LBR. It also noted that all other utilities filed their EE rates (and local distribution adjustment charges, which have the same timing requirement and calculation formula) in Docket No. DE 24-113. It also noted that the Company's LBR filing was made significantly later than it was last year, and that combining it with the EE component of the SBC was also a departure from the previous year.

3. Upon further review and consideration, the Company acknowledges that combining the filings is a departure from previous filings and that combining the filings has inadvertently caused additional challenges, which it now seeks to remedy. Last year the Commission ordered the Company to remove the LBR from Docket No. DE 23-068, where the EE triennial plan was being considered, and submit it with a petition to open a new docket no later than September 1, 2023. There was no such directive this year, so the Company determined it would be less burdensome to all parties to combine the EE with the LBR in a consolidated SBC rate filing. This decision was not intended to hinder proper review of the LBR or EE rate components or to create a burden for any party or the Commission. In hindsight, the Company should have taken into account that the EE portion of the SBC is a much simpler calculation that is prescribed by law, leaving little room for interpretation or error. The LBR calculation, however, is both a different and more involved process. Additionally, the use of a 2023 test year for the Company's current rate case added an

element of complexity to this year's filing as it potentially reset LBR effective August 1, 2024, something not contemplated in the original design of the LBR rate that went into effect January 1, 2024, (and remained in effect after August 1, 2024) creating an overcollection which makes the proposed 2025 LBR rate a credit to customers. The Company recognizes that this creates the need for additional time to review of the LBR portions of the filing compared other portions of the filing.

4. To ameliorate the hardship of such an abbreviated review, the Company proposes to remove the EE component to Docket No. DE 24-113. No party's rights, duties or obligations would be impacted by such a move, and doing so will facilitate the resolution of both the Eversource EE and LBR rates. Removing the EE rate has a dual benefit: it will leave the LBR to be considered individually in this docket without creating a new docket; and it will eliminate the time constraint for approval of the LBR, as there is no legal requirement for the effective date of changes to LBR. The only reason there was a time constraint was due to the Company proposing to combine EE with LBR and requesting that the combined rate inclusive of both components go into effect January 1, 2025.

5. With the removal of the EE component, LBR can be properly considered without urgency, allowing for a fulsome review by all parties to the docket and the Commission. Attached to this motion is updated testimony and supporting attachments of Ms. Ashley Botelho, Director of revenue requirements, which reflects a stand-alone LBR rate proposal. As a fully reconciling rate, LBR applies interest at the prime rate, ensuring that customers receive the full benefit of any credit upon a delayed implementation.

6. As a final matter, in addition to the hardship of an abbreviated review, the Company's filing put the Commission in the position of scheduling a hearing during the Christmas and

Hannukah holidays so that it could fulfill the Company's request for a January 1, 2025 effective date. The Company apologizes to all whom this adversely impacted. The Company conferred with both the Department of Energy and the Office of the Consumer Advocate and is aware that all or nearly all who would need to staff the hearing have long-planned familial commitments for the holidays. Eversource strongly wishes to alleviate this hardship and implores the Commission respectfully, since there is no time sensitivity to the implementation of the LBR with this amended petition, to reschedule the hearing in this docket in time for an LBR effective date March 1, 2025, or the first of any subsequent month that the Commission prefers so that all may be with family for the holidays. Both the Department of Energy and the Office of the Consumer Advocate support approval of this motion.


WHEREFORE, EVERSOURCE requests to amend its petition in this docket for the reasons stated in this Motion. Specifically, Eversource requests that the Commission:

- A. Allow the removal of the EE rate component to Docket No. DE 24-113 for consideration;
- B. Reschedule the hearing for some time after the new year, for an LBR effective date of February 1, or the first of a subsequent month; and
- C. Grant any such other relief as may be just and equitable.

Respectfully submitted,

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

Date: December 13, 2024

By: 

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CERTIFICATE OF SERVICE

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



Date: December 13, 2024

Jessica A. Chiavara