



**Public Service  
of New Hampshire**

<b>ORIGINAL</b>	
N.H.P.U.C. Case No.	DE 12-295
Exhibit No.	# 23
Witness	Panel 3
DO NOT REMOVE FROM FILE	

780 No. Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire  
P.O. Box 330  
Manchester, NH 03105-0330  
(603) 634-2961  
(603) 634-2438 Law Dept. Fax

Matthew.foosum@nu.com

The Northeast Utilities System

Matthew J. Fossum  
Senior Counsel

April 11, 2014

Douglas L. Patch  
Orr & Reno  
45 South Main St.  
P.O. Box 3550  
Concord NH 03302-3550

RE: DE 12-295, Petition for Review of Certain PSNH Charges to Competitive Suppliers  
PSNH's Responses to OCA's Set 2 Data Requests

Dear Mr. Patch:

In accordance with N.H. Admin Rule 203.09, please find attached Public Service Company of New Hampshire's responses to the second set of data requests of RESA in the above captioned docket. Hard copies will not follow.

Please do not hesitate to contact me with any questions.

Very truly yours,

Matthew J. Fossum  
Senior Counsel

Enclosures  
Cc: Discovery Service List

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Request No. RESA 2-003

Request from: Retail Energy Supply Association

Date of Response: 04/11/2014

Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Please provide in detail any and all expenses or costs that PSNH has incurred with regard to such supplier defaults.

**Response:**

Objection: PSNH objects to the question on the grounds that it is burdensome to compile information about "any and all" supplier defaults, whether cured or not, since restructuring, including any specific costs of such defaults. Moreover, PSNH objects on the ground that the information sought is irrelevant to this proceeding and the question is not reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving, the objection, PSNH will supply information about costs it has incurred to date due to two recent supplier defaults.

Please see response to ENH 2-004.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Date of Response: 04/11/2014

Request No. RESA 2-004

Page 1 of 1

Request from: Retail Energy Supply Association

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Were any of those expenses or costs one time costs, i.e. costs that would not be incurred with future defaults?

**Response:**

No.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Date of Response: 04/11/2014

Request No. RESA 2-006

Page 1 of 1

Request from: Retail Energy Supply Association

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Please provide detail about all expenses PSNH has incurred or will incur with regard to the switching of customers from a supplier that has defaulted to PSNH default service.

**Response:**

Objection: PSNH objects to the question as speculative to the extent it requests information about potential future costs. Subject to, and without waiving, this objection, PSNH will supply information about costs it has incurred to date due to two recent supplier defaults.

Please see response to ENH 2-004.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Request No. RESA 2-007

Request from: Retail Energy Supply Association

Date of Response: 04/11/2014

Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Please explain why this particular supplier default charge should be taken up in this docket and not in PSNH's next rate case.

**Response:**

In its Order of Notice for this proceeding, the Commission determined the scope of this docket which included the selection charge. The supplier default charge is a refinement of the selection charge, which is part of this docket.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Date of Response: 04/11/2014

Request No. RESA 2-010

Page 1 of 1

Request from: Retail Energy Supply Association

Witness: Heather M. Tebbetts, Charles R. Goodwin

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**Request:**

On page 1 of the Joint Technical Statement PSNH filed on March 12, 2014 in this docket it says the rate for the bill and payment service charge was developed by including the labor and benefits cost and dividing by the approximate number of bills produced by PSNH on behalf of suppliers "approximately 50%, annually." Please explain in detail what this "50%" refers to, 50% of what number?

**Response:**

For clarification, about 25% of PSNH's customers are taking supplier service. The average of 50% refers to the total percent of kilowatt-hours not billed for PSNH's energy service.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Request No. RESA 2-011

Request from: Retail Energy Supply Association

Date of Response: 04/11/2014

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Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Attachment 1 to the Joint Technical Statement refers to approximate number of bills generated per year and says this is "[b]ased on an average of 50% of customers taking supply from CEPS." Is this referring to 50% of the total number of customers taking delivery service from PSNH? If so, how does that compare with the last migration report that PSNH filed with the Commission? What percentage of PSNH delivery service customers took service from CEPS in December of 2013?

**Response:**

Please see response to RESA 2-010.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Date of Response: 04/11/2014

Request No. RESA 2-012

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Request from: Retail Energy Supply Association

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

On page 4 of the Joint Technical Statement PSNH says: ""PSNH found that taking into consideration only the incremental costs associated with supplier services, collections would not meet the requirements of the cost of service study..." Please explain in detail what is meant by the words that have been quoted.

**Response:**

PSNH collects on behalf of the supplier and the utility. There is no incremental cost associated with collecting if PSNH is trying to collect on both delivery and supplier portions.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Request No. RESA 2-013

Request from: Retail Energy Supply Association

Date of Response: 04/11/2014

Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Please explain how PSNH defines supplier default for the purposes of this newly proposed \$5 charge, would it just be limited to instances where ISO-NE retires the supplier's load asset as a consequence of defaulting with the ISO? If not, please specify all of the instances in which this charge would apply.

**Response:**

The \$5 charge in PSNH's cost of service study is not a new charge, but is a refinement to the selection charge which has been charged to suppliers who defaulted with ISO-NE twice in a ten month period.

PSNH would render the \$5.00 per customer charge in any instance where a competitive energy service provider no longer has the ability to serve customers in NH.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Date of Response: 04/11/2014

Request No. RESA 2-014

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Request from: Retail Energy Supply Association

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

What is PSNH's position on whether it would be more appropriate to allow for Commission-approved recovery of actual costs incurred in each default instance rather than a \$5 per customer charge?

**Response:**

PSNH has not considered whether or not it would support a Commission-approved recovery of actual costs incurred in each default instance rather than a \$5 per customer charge.