

STATE OF NEW HAMPSHIRE  
before the  
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire  
Request for Permanent Distribution Rates Change  
Docket No. DE 13-248

**JOINT REQUEST OF THE CITY OF MANCHESTER AND PUBLIC SERVICE  
COMPANY OF NEW HAMPSHIRE TO APPROVE AMENDED  
RATE EOL TO INCLUDE LIGHT EMITTING DIODE TECHNOLOGY AND  
ASSOCIATED SETTLEMENT AGREEMENT**

Consistent with the direction of the Commission, the City of Manchester, New Hampshire (“City”) and Public Service Company of New Hampshire (“PSNH” or “the Company”) have engaged in extensive discussions with respect to PSNH’s petition to amend its Rate EOL to include light emitting diode (“LED”) technology. As a result of those discussions, PSNH and the City hereby jointly request that the Commission approve PSNH’s amended proposal for the inclusion of LED lighting under Rate EOL and the settlement agreement reached by and between the City and PSNH relating to the City’s LED street lighting. In support of this joint request, the City and PSNH state as follows:

1. On August 8, 2013, PSNH filed a petition to amend its existing Rate EOL to include LED technology. As noted in PSNH’s petition, Rate EOL is an unmetered rate for street lighting service available to federal, state, county, municipal and other governmental entities. To qualify for the rate, customers must agree to convert all of their roadway and area lighting to either high pressure sodium (“HPS”) or metal halide (“MH”) and to pay PSNH the remaining unexpired life of all existing fixtures and brackets and the installed cost of new HPS or MH fixtures and brackets placed in service. Also, the tariff covering Rate EOL includes a fixed monthly distribution rate per fixture and the monthly kWh per light fixture assumed for billing purposes.

Transmission, Stranded Cost Recovery, System Benefits, Electricity Consumption Tax and energy service charges are calculated by multiplying the monthly kWh per light fixture by the applicable charge. In the Settlement on PSNH's distribution rates approved in Docket No. DE 09-035, PSNH agreed to monitor developments in LED technology for use in street lighting applications. As a result of the Company's review, PSNH determined that it would begin offering an LED option under Rate EOL. PSNH believes that offering an LED lighting service option is consistent with PSNH's commitments to assist customers in managing their cost of electricity, to support energy-efficient initiatives, and to support New Hampshire's clean energy goals.

2. On October 23, 2013, the Commission issued an order of notice setting a technical session for November 5, 2013 and a hearing on the merits for December 10, 2013. On December 4, 2013, the City filed a request to intervene in the docket noting that it was one of the largest, if not the largest, customer on PSNH's Rate EOL, and that it was interested in pursuing the use of LED street lighting. Among other things, the City requested that the docket be continued to allow for additional consideration of the issues relating to PSNH's petition.

3. At the December 10, 2013 hearing, the Commission granted the City's requests to intervene and to continue the docket. The Commission encouraged the City and the Company to work together to resolve the issues between them relative to PSNH's petition. Thereafter, the City and the Company engaged in extensive discussions. As a result of those discussions, the City and PSNH have entered into a settlement agreement relating to certain issues specific and unique to the City, and PSNH has redesigned its proposal for the inclusion of LED technology under Rate EOL that would apply to all customers availing themselves of the LED option.

4. With respect to the redesigned rate, and as described more fully in the enclosed updated testimony of Charles R. Goodwin, PSNH has redesigned the LED option under Rate EOL to decrease the monthly fixed distribution charge per fixture and to increase the proposed distribution rate per watt. In addition, PSNH has removed a charge of \$0.95 per month per fixture relating to the maintenance of the lights and in its place PSNH is proposing to implement a “per visit” charge for maintenance on LED lights. The net effect of these changes would be to lower the overall rate for customers taking the LED option. Further, PSNH is proposing to permit customers to use private, third-party contractors for the installation of the LED lights. These changes would be applicable to all customers availing themselves of the LED option under Rate EOL.

5. Specific to the City of Manchester, under the terms of the settlement agreement filed contemporaneously with this request, the City will be assuming the responsibility for the maintenance of its existing streetlights as well as any newly installed LED lights on a pilot basis. PSNH and the City believe that allowing the City to maintain its own lights will inform the City, the Company and the Commission about the successes and challenges in permitting municipalities to perform such work. In addition, and specific to the City, the City and PSNH have undertaken an initial analysis of the City’s proposal for converting its existing lights to LED technology for the purpose of determining whether, and to what extent, the City’s proposal would qualify for funding under certain energy efficiency programs administered by PSNH. The settlement agreement sets out the conclusions of the City and PSNH with respect to the potential incentives available to the City under the terms of the relevant programs, subject to the successful completion and verification of the City’s LED conversion project.

6. Both the City and PSNH believe, and therefore contend, that the newly redesigned rate will be just and reasonable and that it should be approved by the Commission. Moreover, the City and PSNH request that the Commission approve the settlement agreement as just and reasonable and consistent with the public interest. Accordingly, the City and PSNH request that the Commission resume the docket and approve the enclosed submissions.

WHEREFORE, for the reasons stated above, and in the attached testimony, PSNH and the City respectfully request that the Commission:

- A. Approve the amended proposal to include LED lighting under PSNH's Rate EOL;
- B. Approve the settlement agreement between the City and PSNH; and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

The City of Manchester  
By its Attorney

Dated: 7/1/14

  
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Susan S. Geiger  
Orr & Reno, P.A.  
45 South Main St.  
P.O. Box 3550  
Concord, NH 03302-3550  
(603) 223-9154  
email: sgeiger@orr-reno.com

Public Service Company of New Hampshire  
By Its Attorney

Dated: July 1, 2014

  
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Matthew J. Fossum  
Senior Counsel  
Public Service Company of New Hampshire  
780 No. Commercial Street, P.O. Box 330  
Manchester, NH 03105-0330

(603) 634-2961  
Matthew.fossum@nu.com

CERTIFICATE OF SERVICE

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

July 1, 2014  
Date

  
Matthew J. Fossum