

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

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
RECONCILIATION OF ENERGY SERVICE AND STRANDED COSTS FOR
CALENDAR YEAR 2015
PREPARED TESTIMONY OF
CHRISTOPHER J. GOULDING**

1 **Q. Please state your name, business address and position.**

2 A. My name is Christopher J. Goulding. My business address is 780 North Commercial
3 Street, Manchester, NH. I am employed by Eversource Energy Service Company as the
4 Manager of New Hampshire Revenue Requirements and in that position I provide service
5 to Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or
6 the “Company”). For purposes of this testimony, references to Eversource Energy will
7 mean the parent company and references to Eversource will mean PSNH.

8 **Q. Have you previously testified before the Commission?**

9 A. Yes, I have.

10 **Q. What are your current responsibilities?**

11 A. I am currently responsible for the coordination and implementation of revenue
12 requirements calculations for Eversource, as well as the filings associated with
13 Eversource’s Energy Service (“ES”) rate, Stranded Cost Recovery Charge (“SCRC”),
14 Transmission Cost Adjustment Mechanism (“TCAM”), and Alternate Default Energy rate.

15 **Q. What is the purpose of your testimony?**

16 A. The primary purpose of my testimony is to provide an overview of this filing and to seek
17 approval of the reconciliation between the revenues and expenses contained within

1 Eversource's Energy Service ("ES") and Stranded Cost Recovery Charge ("SCRC") rate
2 filings for the twelve-month reporting period January 1, 2015 through December 31, 2015
3 ("reporting period").

4 **Q. Will anyone else be providing testimony in support of this filing?**

5 A. Yes. Elizabeth H. Tillotson, Manager of Regulatory and Environmental for Eversource
6 will review the performance of Eversource's fossil-hydro generation units and Frederick B.
7 White, Supervisor - Power Supply Analysis and Policy, Eversource will review how
8 Eversource met its energy and capacity requirements during this reporting period.

9 **Q. Have you calculated replacement power costs as a result of outages incurred during**
10 **the period as discussed in Ms. Tillotson's testimony?**

11 A. Yes. Attachment CJG-2 summarizes the replacement power costs incurred as a result of
12 forced outages during the period.

13 **Q. Please describe the ratemaking framework that began on May 1, 2001.**

14 A. On May 1, 2001 (Competition Day), Eversource began to recover costs under the
15 Restructuring Settlement. Under the terms of the Restructuring Settlement, Eversource
16 continues to recover costs related to the generation and delivery of electricity, but the
17 specific rate structure now in place segments recovery into various components. The four
18 major components of that segmentation are the Delivery Charge, the Transmission Cost
19 Adjustment Mechanism (TCAM), the SCRC, and the ES rate. Two of the major
20 interrelated rate components, the SCRC and the ES rate are the subject of this proceeding.

21 **Energy Service Charge**

22 **Q. Please describe the ES recovery mechanism.**

23 A. Under restructuring, customers have a choice regarding their energy supplier. Customers
24 may contract for and obtain energy on their own, or they may choose to continue to receive
25 their energy from Eversource.

26 Under the terms of the Restructuring Settlement and subsequent legislation, Eversource is
27 required to provide ES to those customers who request it. Initially, ES rates were set by

1 statute. Beginning in February 2003, the ES rate for large commercial and industrial
2 customers was based on Eversource’s forecast of “actual, prudent and reasonable costs.”
3 Beginning in February 2004, the ES rate for all retail customers was based on a forecast of
4 “Eversource’s actual, prudent, and reasonable cost of service.” The chart below shows the
5 ES rates per kWh which have been in effect since Competition Day.

Rate in Effect:	Rate Set By: Statute or Docket No.	Residential, Small Commercial/Industrial Customers (RSCI)	Large Commercial/ Industrial Customers (LCI)
May 1, 2001 – January 31, 2003	Statute	4.40 cents	4.40 cents
February 1, 2003 - January 31, 2004	RSCI – Statute LCI-DE 02-166	4.60 cents	4.67 cents
February 1, 2004 - July 31, 2004	DE 03-175	5.36 cents	5.36 cents
August 1, 2004 - January 31, 2005	DE 03-175	5.79 cents	5.79 cents
February 1, 2005 - July 31, 2005	DE 04-177	6.49 cents	6.49 cents
August 1, 2005 - January 31, 2006	DE 04-177	7.24 cents	7.24 cents
February 1, 2006 - June 30, 2006	DE 05-164	9.13 cents	9.13 cents
July 1, 2006 - December 31, 2006	DE 05-164	8.18 cents	8.18 cents
January 1, 2007 - June 30, 2007	DE 06-125	8.59 cents	8.59 cents
July 1, 2007 – December 31, 2007	DE 06-125	7.83 cents	7.83 cents
January 1, 2008 - June 30, 2008	DE 07-096	8.82 cents	8.82 cents
July 1, 2008 - December 31, 2008	DE 07-096	9.57 cents	9.57 cents
January 1, 2009 - July 31, 2009	DE 08-113	9.92 cents	9.92 cents
August 1, 2009 - December 31, 2009	DE 08-113	9.03 cents	9.03 cents

Rate in Effect:	Rate Set By: Statute or Docket No.	Residential, Small Commercial/Industrial Customers (RSCI)	Large Commercial/ Industrial Customers (LCI)
January 1, 2010 - June 30, 2010	DE 09-180	8.96 cents	8.96 cents
July 1, 2010 - December 31, 2010	DE 09-180	8.78 cents	8.78 cents
January 1, 2011 - June 30, 2011	DE 10-257	8.67 cents	8.67 cents
July 1, 2011 - December 31, 2011	DE 10-257	8.89 cents	8.89 cents
January 1, 2012 – April 15, 2012	DE 11-215	8.31 cents	8.31 cents
April 16, 2012 – June 30, 2012	DE 11-250	8.75 cents	8.75 cents
July 1, 2012 - December 31, 2012	DE 11-215	7.11 cents	7.11 cents
January 1, 2013 – June 30, 2013	DE 12-292	9.54 cents	9.54 cents
July 1, 2013 - December 31, 2013	DE 12-292	8.62 cents	8.62 cents
January 1, 2014 – June 30, 2014	DE 13-275	9.23 cents	9.23 cents
July 1, 2014 – December 31, 2014	DE 13-275	9.87 cents	9.87 cents
January 1, 2015 – June 30, 2015	DE 14-235	10.56 cents	10.56 cents
July 1, 2015 – December 31, 2015	DE 14-235	8.98 cents	8.98 cents

1 **Q. Please describe the costs incurred in providing ES to customers during the**
2 **twelve-month reporting period.**

3 A. ES costs include the fuel costs associated with Eversource's generation as well as
4 costs and revenues from energy and capacity purchases and sales. Also included
5 are costs related to the New Hampshire Renewable Portfolio Standard ("RPS") and
6 the Regional Greenhouse Gas Initiative ("RGGI"). Finally, additional costs include
7 those associated with IPP power valued at market prices, revenue requirements of
8 generation such as: non-fuel O&M, depreciation, property taxes and payroll taxes,
9 and a return on the net generation investment. Detailed information on the cost of
10 generation is included in Attachment CJG-3 and Attachment CJG-4, page 6.

11 **Q. Are Scrubber costs included in the final results of the reporting period for**
12 **Energy Service?**

13 A. Yes. The Scrubber was operational and used and useful on September 28, 2011.
14 The Scrubber costs relate to the return on the Scrubber rate base, depreciation,
15 property tax and Scrubber-related O&M, fuel and avoided SO2 costs.

16 **Q. Has there been any recovery of Scrubber costs through ES rates for the period**
17 **January 1, 2015 through December 31, 2015?**

18 A. Yes, the costs of the Scrubber were partially recovered in rates for 2015. In 2011,
19 the Commission opened Docket No. DE 11-250 - Investigation of Merrimack
20 Station Scrubber Project and Cost Recovery to address the issue of Scrubber cost
21 recovery. In that docket, the Commission approved a temporary rate of 0.98 cents
22 per kWh to partially recover Scrubber costs effective April 16, 2012.

23 **Q. What are the final results for ES in the 2015 reporting period?**

24 A. As shown on Attachment CJG-4, page 5, line 9, last column, the ES had a net
25 adjusted under-recovery balance of \$129.8 million at December 31, 2015. This net
26 adjusted under-recovery was due primarily to deferred Scrubber costs of \$123.8
27 million (i.e., Scrubber costs incurred in excess of the temporary rate recovery). The
28 \$6.0 million Scrubber adjusted under-recovery was due to \$21.3 million revenues

1 lower than forecasted primarily driven by migration, in addition to \$3.4 million of
2 O&M higher than forecasted, offset by approximately \$18.7 million of combined
3 Return on Rate Base, Energy Expenses and other miscellaneous expenses lower
4 than forecast. With respect to the deferred Scrubber costs, through Order No.
5 25,854 (December 22, 2015) Eversource was permitted to fully recover the
6 Scrubber related costs, as well as to begin recovering the previously deferred costs,
7 through the Energy Service Rate on January 1, 2016 (after the reporting period).
8 Eversource anticipates that the Commission will complete its review of Scrubber
9 costs in conjunction with a settlement presently pending before the Commission in
10 Docket Nos. DE 11-250 and DE 14-238, after which it is expected that a full
11 reconciliation of deferred Scrubber costs will take place. As such, the costs
12 associated with the Scrubber are not addressed in this filing.

13 **Stranded Cost Recovery Charge**

14 **Q. Please describe the SCRC and its components in more detail.**

15 A. The SCRC recovers costs categorized as “stranded” by New Hampshire law in RSA
16 Chapters 374-F and 369-B. The initial SCRC average rate of 3.4 cents per kWh
17 was agreed to in the Restructuring Settlement which further defined what
18 Eversource’s stranded costs were and categorized them into three different parts
19 (i.e. Parts 1, 2, and 3) based on their priority of recovery. Effective June 30, 2006,
20 Part 3 costs were fully recovered.

21 **Q. Please describe the costs that are recovered through the SCRC.**

22 A. The first tier, Part 1 stranded costs, has the highest priority for recovery. All Part 1
23 costs have been securitized through the issuance of rate reduction bonds (“RRBs”).
24 Part 1 costs consist of the over-market portion of Seabrook regulatory assets, a
25 portion of Eversource’s share of Millstone 3, and certain financing costs that were
26 incurred (i.e. underwriters fees, legal fees, etc.) while obtaining the RRB financing.
27 RRB interest and RRB fees are also recovered as Part 1 costs. Page 4 of
28 Attachment CJG-4 shows the recovery of Part 1 costs by month.

1 The second tier, Part 2 stranded costs, includes “ongoing” costs consisting of the
2 over-market value of energy purchased from IPPs and the up-front payments made
3 for IPP buy-downs and buyouts previously approved by the Commission, and
4 Eversource’s share of the present value of the savings associated with these buy-
5 down and buy-out transactions. Eversource is amortizing these up-front payments
6 over the respective terms of the original IPP rate orders, including a return on the
7 unrecovered costs.

8 In addition, Part 2 costs include a negative return on the credit for deferred taxes
9 related to the Part 1 securitized stranded costs and a return on the unpaid contract
10 obligations to Connecticut Yankee Atomic Power Co., Maine Yankee Atomic
11 Power Co., and Yankee Atomic Energy Corp., net of related deferred taxes. Page 4
12 of Attachment CJG-4 shows the detailed Part 2 costs by month.

13 **Q. What is your estimate of how long Eversource will continue to bill the SCRC?**

14 A. That depends on the type of cost. Part 1 costs are recovered through the SCRC over
15 the life of the corresponding terms of the rate reduction bonds. Part 1 recovery
16 ended in May 2013 since the RRBs were fully amortized as of the end of April
17 2013.

18 The timing of Part 2 cost recovery through the SCRC is dependent on the type of
19 cost. There are several types of Part 2 costs: ongoing purchases from the IPPs; the
20 amortization of up-front payments associated with buyouts or buydowns of IPP rate
21 orders or contracts; and various returns, including (1) the return on the credit for
22 Part 1 related deferred taxes, (2) returns on Part 2 stranded costs and the outstanding
23 Yankee contract obligations, (3) the return on SCRC deferred balance.

24 Ongoing IPP purchases are obligations that will end when the various rate orders or
25 contracts expire. The up-front payments associated with buyouts or buydowns of
26 IPP rate orders or contracts are also being amortized over the remaining lives of the

1 respective rate orders or contracts. The last such rate order or contract expires in
2 the early 2020s. However, most wood-burning IPP rate orders expired in late 2006
3 with the last rate order for a wood-fired IPP expiring in 2008. Therefore, Part 2
4 costs have decreased and will continue to decrease as additional rate orders expire.
5 In addition, the credit for Part 1 related deferred taxes pertaining to RRBs ended in
6 May 2013 with the full amortization of Part 1 costs.

7 **Q. Please provide an overview of stranded cost recovery during the 2015**
8 **reporting period.**

9 A. During the reporting period, the total accumulated balance of Part 2 costs decreased
10 by \$6.0 million from \$9.6 million at the end of 2014 to \$3.6 million at the end of
11 2015. See Attachment CJG-4, page 1.

12 **Q. What are the final results for the SCRC in the 2015 reporting period?**

13 A. For the SCRC, the net balance as of December 31, 2015 is an under-recovery of
14 \$3.6 million as shown on Attachment CJG-4, page 1, line 4, 3rd column. This
15 under-recovery primarily relates to the addition of RRB costs in the prior year under
16 recovery balance that Eversource will not start collecting until January 1, 2016. As
17 part of the SCRC mid-year rate adjustment portion of Docket No. DE 12-291,
18 Eversource agreed to credit this cash to customers in full and subsequently seek its
19 recovery in the 2013 annual reconciliation docket in order to allow for a full
20 discovery process to take place as part of the reconciliation docket. In the
21 Settlement Agreement for Docket No. DE 14-120, dated September 18, 2015, it was
22 agreed that Eversource could recover half of these funds plus applicable interest.
23 These funds to be recovered were included as an additional under-recovery in CJG-
24 1, Page 1, Line 4, 1st column, but will not start to be recovered until January 1,
25 2016, thus having an under recovery impact for the 2015 year. In addition, there
26 were Above Market IPP Costs higher than forecast, offset by a credit to Yankee
27 Obligations that was not forecasted.

1 **Q. Was there activity through the Seabrook Power Contracts in 2015 that affected**
2 **the Seabrook net proceeds figure?**

3 A. Yes. There were credits to NAEC of \$0.2M in 2015 reported on Attachment CJG-
4 4, page 6. While there may be additional charges and credits in 2016 that will
5 further impact the net proceeds figure, we do not expect these amounts to be
6 significant. However, we are unable to quantify these charges and credits at this
7 time.

8 **Q. Will these Seabrook-related subsequent charges and credits be passed on to**
9 **Eversource?**

10 A. Yes, the Seabrook Power Contracts between Eversource and NAEC are still in
11 place for Seabrook sale reconciliation purposes.

12 **Q. Did Eversource file a summary of 2015 benefits for the Northern Wood Power**
13 **project (NWPP)?**

14 A. Yes. Attachment CJG-4, page 10 provides the NWPP revenue target as well as the
15 projected incremental revenues based on Schiller Unit 5 generation, consisting of
16 Renewable Energy Certificates (RECs), Production Tax Credit (“PTCs”) and RGGI
17 avoided costs. These 2015 credits will be trued up to actual in the 2016 ES/SCRC
18 filing.

19 **Q. Please summarize your request to the Commission.**

20 A. Eversource is requesting that the Commission approve the 2015 ES and SCRC
21 reconciliations and find that Eversource’s generation and purchased power costs
22 were prudently incurred.

23 **Q. Does this conclude your testimony?**

24 A. Yes, it does.