

**STATE OF NEW HAMPSHIRE****Inter-Department Communication****DATE:** January 10, 2019**AT (OFFICE):** NHPUC

**FROM:** Gary Cronin   
Utility Analyst, Consumer Services and External Affairs Division

**SUBJECT:** DE 17-171, Public Service of New Hampshire d/b/a Eversource Energy  
Tariff Amendment regarding Late Payment Charge

**TO:** Commissioners  
Debra Howland, Executive Director

**CC:** Amanda Noonan, Director, Consumer Services and External Affairs Division  
Tom Franz, Director, Electric Division  
Rorie Patterson, Assistant Director, Consumer Services and External Affairs  
Division  
Suzanne Amidon, Staff Attorney

On December 1, 2017, in Order No. 26,081, the Commission approved Public Service of New Hampshire d/b/a Eversource Energy's (Eversource) amended tariff extending the time period after which Eversource assessed a late payment charge on customer bill payments from 25 to 30 days. On March 7, 2018, Commission Order 26,100 required Eversource to stop assessing late payment charges on customer accounts where the bill was paid by USPS mail. The Commission's orders were necessitated by the untimely processing of mailed payments to Eversource's payment processing center located in Dallas, Texas. In its order, the Commission indicated it would revisit the suspension of the late payment charges following the transition by Eversource to a new payment processing vendor and a demonstration that there were no mail delays associated with the new vendor.

Eversource transitioned to a new payment processing vendor located in Boston, Massachusetts in June 2018. Staff met with Eversource on October 16, 2018, to review the results of a mail study conducted by Eversource's new payment vendor. On December, 13, 2018, Eversource filed a request to reinstate late payment charges and to amend its tariff to return to a 25-day period for the purpose of deeming a customer payment late and therefore subject to a late payment charge. Eversource's filing included an amended tariff.

Specifically, Eversource proposed a two-step process to accomplish the change to its handling of mailed customer payments. The first step would end the manual process of waiving late payment charges for payments made by mail effective February 1, 2019, and the second would return to the original 25-day period for the imposition of a late payment charge in effect prior to Order No 26,081. The return to the 25 day payment window would be as of May 1, 2019.

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Staff Recommendation  
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Based on the information provided by the Eversource and a review of the Consumer Services and External Affairs database, the delayed processing problems related to mailed payments appear to be resolved. Additionally, Staff has reviewed Eversource's December 13, 2018, filing and confirms the company's compliance with Order 26,081.

Staff recommends the Commission approve the reinstatement of late payment charges consistent with the two- step process proposed by the company in its December 13, 2018 filing with the first step effective February 1, 2019. Staff also recommends the Commission approve Eversource's amended tariff as filed.

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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Docket #: 17-171-1 Printed: January 10, 2019

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- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**