STATE OF NEW HAMPSHIRE before the PUBLIC UTILITIES COMMISSION

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

DOCKET NO. DE 17-XXX

PETITION FOR CONTINUATION OF RELIABILITY ENHANCEMENT PROGRAM

Pursuant to N.H. Code Admin. Rule Puc 203.06, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") hereby petitions for the Commission's approval of the continuation of Eversource's Reliability Enhancement Program ("REP") in calendar year 2018. In support of this Petition, Eversource states as follows:

- 1. Eversource's REP was initially established as part of Docket No. DE 06-028, the Company's 2006 rate case, to provide targeted funding for enhanced capital and operation and maintenance ("O&M") spending intended to improve the reliability of Eversource's distribution system. The REP was updated and expanded through a settlement agreement in Docket No. DE 09-035, the Company's 2009 rate case. That settlement agreement was approved by the Commission in Order No. 25,123 (June 28, 2010). Based upon the availability of the REP funding, the Company has been able to successfully develop and implement plans for specific projects and activities aimed at improving the reliability and resiliency of its distribution system. The targeted funding provided through the REP was scheduled to end on June 30, 2015, coincident with the expiration of Eversource's settlement agreement in Docket No. DE 09-035.
- 2. On June 10, 2015, and following extensive negotiations, Eversource and numerous other parties filed the "2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement" (the "Agreement"), a comprehensive settlement relating to a variety of issues concerning Eversource's divestiture of its existing electric generating fleet. The

Agreement contained, as one of its terms, a provision for the continuation of the REP and contemporaneously with the filing of the Agreement, Eversource moved for a continuation of the REP.

- 3. By Order No. 25,793 (June 25, 2015), the Commission granted Eversource's motion and permitted the Company to adjust its distribution rates to collect the annual revenue necessary to recover the revenue requirements associated with REP capital additions and O&M expenses. In approving the REP-related adjustment to Eversource's distribution rates, the Commission found "ample reason to continue the REP" and stated that "Eversource's reliability metrics have improved since the inception of the program, and customers have experienced tangible benefits in reduced frequency and duration of outages." *Public Service Company of New Hampshire d/b/a Eversource Energy*, Order No. 25,793 (June 25, 2015) at 5.
- 4. On April 29, 2016, the Company filed for Commission review and approval of the reconciliation of the expenses and revenues relating to REP activities between April 1, 2015 and March 31, 2016, and for review of Eversource's forecast of activities for the period April 1, 2016 through June 30, 2017, consistent with the Agreement and Order No. 25,793. On June 28, 2016, the Commission issued Order No. 25,913 approving Eversource's request. In its Order the Commission noted that there was, at that time, "no proposal to reconcile actual costs with revenues for the twelve months ending June 2017." Order No. 25,913 at 5. However, the Commission stated "Regardless of the future of Eversource's REP program beyond June 2017, we require Eversource to provide an annual report of its REP activities for the period ending June 2017 as it did following the approval of the REP program activities in Order No. 25,123, and a reconciliation of the revenues and expenses incurred during that period." *Id.* The Commission further stated "In the event that Eversource seeks to continue its REP activities

outside of a distribution rate case, we require the Company to work with Staff and the OCA to develop the program." *Id*.

- 5. On May 1, 2017, in what was docketed as Docket No. DE 17-076, Eversource filed a motion to continue the REP for an additional 24 months. That initial proposal was significantly revised in a filing on June 2, 2017, following discussions with the Staff and OCA. In Order No. 26,034 (June 28, 2017), the Commission approved a continuation of the REP for the remainder of calendar year 2017. In that Order, the Commission also directed Eversource to work with the Staff and OCA on a proposal to continue the REP in calendar year 2018.
- 6. Following on the Commission's directive, Eversource worked with the Staff and OCA to develop a continuation of the REP for implementation in calendar year 2018. The enclosed testimony of Lee Lajoie, Eversource's Manager of System Resiliency, and Brian Dickie, Eversource's Director of System Operations, describes the proposed continuation of the REP, as well as the impact of REP investments on the reliability of the Company's system. The enclosed testimony of Christopher Goulding, Eversource's Manager of Revenue Requirements for New Hampshire, explains the reconciliation of expenses and revenues for the REP. Of note, in this revised program, Eversource has scaled back the scope and cost of its REP activities, and it has agreed to implement certain changes to expenses relating to the Troubleshooter program and the capitalization of enhanced tree trimming and hazardous tree removal activities. Based upon the discussions with the Staff and OCA, Eversource understands that both the Staff and OCA support the enclosed proposal for REP activities in 2018.
- 7. For the above reasons, the Company herein requests that the Commission approve the proposed extension of the REP. As the Commission has acknowledged, Eversource's REP has proven valuable to customers, and the Commission has previously found "ample reason to

continue the REP," Order No. 25,793 at 5. In recognition of these benefits, Eversource seeks to continue this program and requests that the Commission accept the enclosed reconciliation and grant this petition to continue the REP.

WHEREFORE, Eversource respectfully requests that the Commission:

- A. Review and approve the enclosed reconciliation of expenses and revenues as it relates to the REP;
- B. Grant Eversource's request to continue the REP in calendar year 2018; and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

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

Dated: December 15, 2017

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