# THE STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

## PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

Docket No. DE 19-XXX

# PETITION FOR ADJUSTMENT OF STRANDED COST RECOVERY CHARGE FOR EFFECT ON AUGUST 1, 2019

Pursuant to Puc 202.01(a) and Puc 203.06, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or "the Company") hereby petitions the New Hampshire Public Utilities Commission ("Commission") for a proceeding to adjust its Stranded Cost Recovery Charge ("SCRC") for effect on August 1, 2019 pursuant to the requirements of RSA 374-F:3 and RSA 369-B:3, the Agreement to Settle PSNH Restructuring (Revised and Conformed) in Docket No. DE 99-099 ("Restructuring Settlement"), the 2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement in Docket No. DE 14-238 (the "2015 Agreement"), and Order No. 26,099 (January 30, 2018) in Docket No. DE 17-096. In support of its Petition, Eversource says the following:

- 1. The SCRC was established under the Restructuring Settlement and originally capped at an average of 3.40 cents per kilowatt hour. Once the Part 3 Stranded Costs were fully collected, the Restructuring Settlement provided that the SCRC would be set on a forecasted basis every six months and would include any over- or under-recovery of Part 1 and Part 2 stranded costs from the previous period.
- 2. In Order No. 24,641 (June 30, 2006), the Commission approved the reduction of the SCRC rate beginning July 1, 2006 to reflect the complete recovery of Part 3 Stranded Costs. The Part 1 costs were fully amortized in 2013 and the final disposition of the funds relating to the Part 1 costs was the subject of Order No. 25,815 (September 18, 2015) which, among other things, permitted the Company to recoup certain of those funds.

When the recoupment was completed in 2016, these initial Part 1 costs were completely recovered.

- 3. Consistent with the 2015 Agreement, which was approved by the Commission along with a related litigation settlement in Order No. 25,920 (July 1, 2016), Eversource transitioned to procuring and providing ES for customers on a competitive basis, rather than through its traditional method and a settlement agreement relating to competitive procurement was approved by Order No. 26,092 (December 29, 2017) in Docket No. DE 17-113. In relevant part, that settlement provided that Eversource would adjust its SCRC on February 1 and August 1 of each year coincident with the changes to the ES, following an initial adjustment on April 1, 2018.
- 4. On February 16, 2018 in Docket No. DE 18-023 Eversource submitted a petition and supporting documentation to adjust its consistent with the settlement approved in Order No. 26,092. Consistent with the 2015 Agreement, the SCRC proposed in that filing contained elements that either had not been included in the SCRC to that point, or that were similar to elements that had previously been included, in particular: costs and market revenues associated with existing Independent Power Producers and the Burgess and Lempster Power Purchase Agreements; as well as estimated class specific RRB charges associated with the then-pending securitization of stranded costs. That petition was approved by the Commission in Order No. 26,116 (March 29, 2018). Thereafter, Eversource submitted information to update the SCRC effective on August 1, 2018. The update included additional elements to reflect the completion of securitization and other changes. The elements of the updated SCRC remain part of the SCRC submission today.
- 5. Enclosed with this Petition are the pre-filed testimony and attachments of Erica L. Menard supporting a change in the SCRC rates applicable to the Company's various rate classes. The changes to the SCRC rate as included in this preliminary filing are attributable to an estimated increase from higher forecasted RRB costs, and higher Part 2 costs offset by higher revenues than forecast for the February 1, 2019 rates.

6. The enclosed attachments and exhibits contain Eversource's current estimates of the SCRC rates for the Company's customer classes for effect on August 1, 2019. The preliminary August 1, 2019 average SCRC rates (excluding the RGGI rebate amount) provided in this filing are:

Rate Class	Current Rate (cents/kwh)	Preliminary Rate (cents/kwh)
R	1.522	1.849
G	1.415	1.637
GV	1.198	1.400
LG	0.420	0.469
OL/EOL	1.720	1.718

The preliminary August 1, 2019 RGGI adder rate is calculated to be negative 0.129 cents/kWh for all customer classes compared to the current rate of negative 0.134 cents/kWh. Eversource is not requesting approval of any specific rates at this time, but will update its estimates with more recent data before a hearing on the merits is held.

7. Lastly, in 2018, RSA chapter 362-H was enacted which, among other things, sets the price of energy purchases from certain "eligible facilities" at mandated above-market rates. Pursuant to RSA 362-H:2, V:

The electric distribution company shall recover the difference between its energy purchase costs and the market energy clearing price through a nonbypassable delivery services charge applicable to all customers in the utility's service territory. The nonbypassable charge may include recovery of reasonable costs incurred by electric distribution companies pursuant to this section. The recovery of the nonbypassable charge shall be allocated among Eversource's customer classes using the allocation percentages approved by the commission in its docket DE 14-238 order 25,920 approving the 2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement.

In its prior SCRC filing in Docket No. DE 18-182, Eversource had included its estimate of the difference between its energy purchase costs and the market energy clearing price for purchases required by RSA chapter 362-H and had requested that the Commission conclude that those costs are recoverable through the SCRC rate. In Order No. 26,208 (January 11, 2019) in Docket No. DE 18-002, the Commission found that it could not

provide the conclusion requested by Eversource as a result of pending challenges to the constitutionality of RSA 362-H. Accordingly, the SCRC rate presently in effect excluded the estimated costs identified by Eversource. *See* Order No. 26,215 (January 28, 2019) at 7-8. Consistent with the Commission's prior ruling, Eversource has excluded the costs of compliance with any Commission order for Eversource to purchase energy pursuant to RSA chapter 362-H from its SCRC calculation. Eversource notes that should the constitutional issues be resolved, and should the Commission's determination be amended, Eversource would request that any overmarket costs be permitted for recovery consistent with RSA 362-H:2, V.

WHEREFORE, Eversource respectfully requests that the Commission open a proceeding, set a schedule for the conduct of this matter, and order such further relief as may be just and equitable.

Respectfully submitted this 6th day of June, 2019.

### PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

By:\_\_\_\_\_

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#### CERTIFICATE OF SERVICE

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

June 6, 2019

Date

Matthew J. Fossum