

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

**Date Request Received: 10/10/2019**

**Date of Response: 10/24/2019**

**Request No. STAFF 1-001**

**Page 1 of 1**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson, Lee G. Lajoie**

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**Request:**

Reference Order No. 26,262 at 6-7 stating “Our prior approval of Eversource’s 2015 LCIRP contained a number of specific deliverables and we will require updates of those no later than August 25, [including] Confirmation that the utility is currently following the process of system planning utilizing those established procedures, criteria, and policies outlined in its 2015 LCIRP.” Please provide a brief narrative identifying and summarizing any instances where the Company is no longer following the procedures, criteria, or policies outlined in its 2015 LCIRP, or is now following any procedure, criteria, or policy not outlined in its 2015 LCIRP.

**Response:**

The following distribution system planning procedures have been adopted since the 2015 LCIRP:

**SYSPLAN-008 - Calculation and Documentation of Bulk Distribution Transformer Ratings**

This procedure changed the bulk transformer rating from a “loss of life” determined rating (which we referred to as “TFRAT”) to a rating typically limited by hot spot temperature. SYSPLAN-008 also assumes a 75% preload and a fixed peak load period (12 hours summer, 4 hours winter) rather than a 24-hour load curve. The change in the long-term emergency ratings were typically minor increases or decreases, however, the overall result was an increase in the total long-term emergency capacity of the bulk substation transformers. An industry standard PTLoss software is used.

**SYSPLAN 010 – Bulk Distribution Substation Assessment Procedure**

This procedure provides the planning criteria used to assess bulk substations. The 2015 LCIRP was based on ED3002 – Distribution System Planning and Design Criteria Guidelines (which included the bulk substation planning criteria as well as other planning criteria). ED3002 allowed for the loss of up to 30 MW for up to 24 hours as a design criteria. SYSPLAN 010 does not allow for permanent loss of load for the loss of a bulk transformer.

**Peak load forecasting methodology**

The peak load forecasting methodology was modified from a planning area forecast based heavily on historical data to a methodology defined in the response to Docket No. DE 19-057 OCA 7-015.

**Public Service of New Hampshire d/b/a Eversource Energy  
Docket No. 19-139**

**Date Request Received: 10/29/2019**

**Date of Response: 11/12/2019**

**Request No. STAFF 2-002**

**Page 1 of 2**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson**

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**Request:**

Reference Company Response Staff 1-001 describing changes to SYSPLAN-008 and SYSPLAN 010, and Liberty Utilities 2019 LCIRP, Docket No. DE 19-120, Attachment 2, at Bates 0165 projecting incremental costs associated with changes to its planning criteria over a 15 year period.

- a. Please provide a similar summary of incremental costs associated with this change in planning criteria. If the Company has not developed this summary of costs relating to the criteria change, please develop and provide it.
- b. Please describe when the Company began applying these changes to its distribution planning process.
- c. Please explain whether each of these criteria are used to place equipment on a "watch" list for planning engineers to consider for replacement in future years, or whether a forecasted violation of one of the planning criteria places a piece of equipment on the Company's list of required capital projects. If neither is entirely accurate, please provide a narrative discussing how the Company uses SYSPLAN-008 and SYSPLAN 010 to determine which investments are made in the coming years.
- d. SYSPLAN-008 and SYSPLAN 010 appear to only apply to transformers at bulk substations, or more specifically, those substations where the high side is 115kV or more. Please explain whether any changes were made to the Company's distribution system planning criteria that were not at the bulk substation level, for example, for 34.5-14.7kV or smaller transformers.

**Response:**

- a. The Company has six bulk substations which violate the 75% nameplate loading criteria without violating the criteria for loss of a bulk transformer (n-1). Two of the six transformers exceed the short-term emergency rating for the n-1 condition, therefore some action needs to be taken at these locations, however, for the purposes of this response I will assume that action would not require replacement of the transformers. The question of incremental costs is a difficult question since each situation is very different and we do not have examples of simple transformer replacements from which to draw upon. When the Company performs a significant substation upgrade, it generally takes advantage of construction efficiencies and planned outages to address other issues like the replacement of oil circuit breakers with vacuum circuit breakers, replacement of electromechanical relays with numerical relays, upgrading the ground grid, the addition of a low side bus-tie breaker, as well as other prudent investments. If just the cost of upgrading the transformers is considered, we estimate approximately \$2.5 million per transformer. Eleven transformers at \$2.5 million per transformer equates to \$27.5 million.

If the Company continued with its previous criteria of allowing the loss of 30 MW for up to 24 hours for the loss of a bulk transformer, an additional five substations would not violate the n-1 criteria. Applying the same \$2.5 million per transformer, seven transformers at \$2.5 million per transformer equates to \$15 million. It needs to be noted that many of these substations have substandard designs and most have transformers as well as other equipment that were installed in the 1960's which will likely need to be addressed within the next 15 years.

- b. The Company began using SYSPLAN 010 in 2017 for its 2018-2027 analyses. The Company began using the ratings developed from SYSPLAN 008 in 2018 when preparing the 2019-2028 analyses.
- c. SYSPLAN 008 is simply the methodology used to develop ratings for bulk transformers, it does not determine a violation. SYSPLAN 010 is used to determine planning criteria violations. There are many factors that are considered when determining the priority and timeliness of projects to address the violations. For example purposes: If all load can be restored in four load block transfers, it will be a lower priority than a situation where the load can not be restored via switching, even though both of these are criteria violations. If a substation with a planning criteria violation also has significant asset condition concerns, it will likely take priority even if there is less isolated load at risk than a substation that simply has a planning criteria violation. Considerations include the amount of load at risk, basecase loading, asset condition, significant sub-standard substation design, operating and maintenance concerns, among others. The year in which a project is completed is dependent on the criteria noted in the previous sentence as well as the Company needs that are competing for the same distribution budget dollars.
- d. SYSPLAN 010 has not been applied to 34.5-12.47 or 34.5 – 4.16 kV transformers. SYSPLAN 008 has not been adopted Eversource-wide to these lower voltage transformers, New Hampshire System Planning did apply this criteria to these lower voltage transformers during a recent review of all the non-bulk substations to provide a consistent methodology.

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

**Date Request Received: 12/04/2019**

**Date of Response: 12/18/2019**

**Request No. STAFF 3-009**

**Page 1 of 1**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson**

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**Request:**

Reference Company Response Staff 2-002 describing the costs related to the Company's recent criteria changes and when those changes were incorporated into the Company's planning.

- a. Please explain whether any costs associated with the criteria changes have been requested for recovery in the Company's ongoing rate case and why.
- b. Please provide the three supporting documents and or/software referenced in SYSPLAN – 008: (1) IEEE Standard C57.91-2011, "IEEE Guide for Loading Mineral-Oil-Immersed Transformers and Step Voltage Regulators"; (2) EPRI PTLOAD Version 6.2 Software, and Manual.; and (3) IEEE Standard C57.12.00.2015 "IEEE Standard for General Requirements for Liquid-Immersed Distribution, Power, and Regulating Transformers.

**Response:**

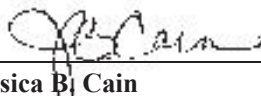
- a. No costs associated with the change in planning criteria have been requested for recovery. No projects proposed to address the new criteria have been constructed.
- b. This request is consistent with question TS 2-043 in the Company's rate case, DE 19-057. The Company has inquired with IEEE and EPRI whether it is able to share the requested information with the Commission Staff and OCA, subject to confidential treatment. The Company has yet to receive an answer from IEEE or EPRI, and will update this response when those entities respond.

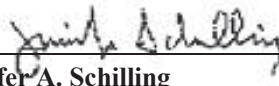
 <b>Northeast Utilities System</b> <b>TD PROCEDURE</b>		<b>TD 190 Rev. 0</b> <b>Targeted Application of C&amp;LM Measures to Meet Peak Load Planning Needs</b>	
<b>Issue Date:</b> 6/18/10	<b>Effective Date:</b> 6/25/10	<b>Owner Department:</b> <b>CL&amp;P Customer Solutions</b> William Quinlan, Vice President  <b>Subject Matter Expert (SME) Name, Departments:</b> <b>Conservation and Load Management (C&amp;LM)</b> CL&P: Ronald J. Araujo, Manager, C&LM WMECO: Richard L. Oswald, Manager, C&LM <b>Marketing Support</b> PSNH: Gilbert E. Gelineau, Jr., Manager, Mkt. Support  <b>Responsible Person (RP) Name, Department:</b> <b>CL&amp;P Conservation and Load Management (C&amp;LM)</b> Samuel R. Fankhauser, Sr. Energy Engineer	<b>Applicability:</b> <b>CT, MA, NH</b>

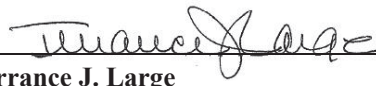
**All changes to TD procedures are controlled by TD 001**  
**“Writing, Revising, and Publishing Transmission and Distribution Procedures.”**

**Roll Out Instructions:**

Prior to initial use of this new procedure, each individual using this procedure is required to attend familiarization training provided by the appropriate SME.

**Approvals:** **CL&P:**   
Name: **Jessica B. Cain**  
Title: **Director, Customer Solutions**

**WMECO:**   
Name: **Jennifer A. Schilling**  
Title: **Director, Business Planning**

**PSNH:**   
Name: **Terrance J. Large**  
Title: **Director, Business Planning & Customer Support Services**

**Procedure applicable only to NU companies for which an approval signature appears above.**

**Ensure you are using the current revision by verifying it against the controlled electronic copy located on the Distribution Engineering Standards Bookshelf or the Regulated Businesses Policies and Procedures Lotus Notes Database.**

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## 1. INTRODUCTION

### 1.1 Objective

Provide instructions and administrative requirements for the following:

- Delay infrastructure replacement expenditures by using C&LM programs to aggregate 1 to 5 MW capacity savings over a 5-yr period within a designated target area delaying the need for a capital project to make existing plant last longer before capital costs associated with full replacement are necessary.

### 1.2 Applicability

The following is a list of the groups and the appropriate personnel having primary responsibilities with this procedure and its content.

1. 1<sup>st</sup> Main Group involved with this TD: CL&P VP, Energy Delivery Services; WMECO President and CEO; PSNH President and Chief Operating Officer;
  - A sub division of that group: CL&P Customer Solutions; WMECO Business Planning; PSNH Business Planning & Customer Support Services.
  - Another sub division of that group: Conservation and Load Management (C&LM) Departments at CL&P, and WMECO; and Marketing Support Department at PSNH.

The following divisional personnel will have specific responsibilities listed in this procedure:

1. Main Group Title of whom will be doing the steps with in this TD: Conservation and Load Management (C&LM) Departments at CL&P, WMECO; and the Marketing Support Department at PSNH
  - Title of personnel: Program Administrators
2. Organizations responsible for submitting requests to trigger use of the procedure: CL&P Asset Management, WMECO System Planning and PSNH Field Engineering Departments.

### 1.3 References

- NU Distribution Capital Investment Project

#### Supporting References

Documents that support performance of activities directed by this procedure:

- DSEM Section 05.20 Circuit Load Projections;
- Asset Management Departments at CL&P, System Planning Department at WMECO, and the Field Engineering Department at PSNH.

#### Supporting Programs and Databases

Programs and databases that support performance of activities directed by this procedure:

- DPUC/DPU/PUC Approved C&LM Programs at CL&P/WMECO/PSNH respectively.

## 1.4 Discussion

Procedure need was established by the NU Distribution Capital Investment (DCI) Project. Currently, there is no process link between NU operating companies and C&LM to address a distribution system “rapid results initiative” to delay need for capital addition.

The purpose of this procedure is to provide process guidance for targeted application of C&LM programs when requested by an NU operating company.

C&LM programs may facilitate delay of infrastructure replacement expenditures within a designated target area of concern identified by an NU operating company. To maximize potential for success, the aggregate MW savings requested needs to be modest, e.g., one to five MW and period of aggregation needs to be relatively long, e.g., ~five-yrs. This condition would normally occur within towns that have limited load growth.

A meeting with management representatives from Asset Management/System Engineering/Field Engineering and their respective C&LM/Marketing representatives shall be conducted on an annual basis to evaluate load projections and discuss potential target areas for feasibility assessment per Section 2.0 of this procedure.

For CL&P, PSNH and WMECO, this annual meeting shall occur in January. This allows all operating companies sufficient time for completion of feasibility studies in advance of the capital budgeting process.

For CL&P this is subsequent to issue of the Distribution Substation Plan (DSP), typically published in January. The objective of this meeting is to review proposed projects that address overloads on sub-stations and to review overloaded feeders from the Load Estimating and Planning (LEAP) report.

C&LM implementation of this procedure is initiated by a written request from NU operating company’s Asset Management (CL&P) or System Planning (WMECO) or Field Engineering (PSNH) Department that identifies the geographical target area of concern with associated MW savings that need to be achieved during ~five-yrs duration. (See NOTE 1).

Specific Requests can be submitted to C&LM throughout the year. Attachment 1 lists the information required by Engineering in order to start the process.

### NOTE 1

At CL&P this procedure is initiated by a written request from the Asset Management Department. At WMECO this procedure is initiated by a written request from the System Planning Department. At PSNH this procedure is initiated by a request from the Field Engineering Department.



**NOTE 2**

This procedure refers to “C&LM” Department and “C&LM” Programs throughout for all three utilities. This is consistent with the nomenclature at CL&P and WMECO. However, at PSNH the nomenclature used is “Marketing Support Department” and “Marketing and Conservation Programs.” For purposes of this procedure the term “C&LM” is used for all three utilities.

**NOTE 3**

There are regulatory prerequisites that need to be considered and addressed by the Companies prior to implementing targeted application of C&LM Programs.

**CL&P and WMECO** – Preliminary review does not reveal explicit regulatory barriers to targeted application of C&LM Programs. However, a thorough review by NUSCO Legal/Regulatory is recommended prior to initiation of the C&LM Lever.

**PSNH** – Will need PUC approval prior to implementing C&LM Lever (see below).

**Background** - - Previously, PSNH’s LCIRP indicated that the electric industry restructuring legislation prohibited allocation of System Benefit revenues in a targeted fashion. However, in the last session of the New Hampshire legislature, a change was made to the state law which had previously prohibited the use of System Benefits Charge funds for "targeted conservation, energy efficiency, and load management..." The kind of thing that this prevented was PSNH evaluating a heavily loaded distribution circuit and using SBC monies to fund a program "targeting" customers on this circuit for efficiency measures. The idea would be to reduce the load on the circuit and thereby reduce PSNH costs by delaying the need for circuit upgrades. With this recent change in the New Hampshire law, targeting (with SBC funds) is now an option -- but this option can only be implemented with explicit Commission approval.

(This technique has been used in other jurisdictions (e.g. see Efficiency Vermont's "geotargeting" - <http://www.efficiencyvermont.com/pages/Common/GeoTargeting/>).

**For Information: The following is the full text of the applicable portion of New Hampshire HB 395 passed by the legislature and signed by the Governor during 2009.**

(e) Targeted conservation, **energy efficiency**, and load management programs and incentives that are part of a strategy to minimize distribution costs **may** be included in the distribution charge **or the** system benefits charge, **provided that system benefits charge funds are only used for customer-based energy efficiency measures, and such funding shall not exceed 10 percent of the energy efficiency portion of a utility's annual system benefits charge funds. A proposal for such use of system benefits charge funds shall be presented to the commission for approval. Any such approval shall initially be on a pilot program basis and the results of each pilot program proposal shall be subject to evaluation by the commission.**

2. INSTRUCTIONS

2.1 **C&LM Department feasibility assessment of proposed target application of C&LM Programs request by NU Operating Company's Asset Management (CL&P) or System Planning (WMECO) or Field Engineering (PSNH) Departments.**

*Appropriate C&LM SME*

2.1.1 ENSURE Operating Company's request for each targeted application of C&LM Programs includes the following information: **(Refer to Attachment 1 for detailed list).**

- a. Geographic location and size of proposed priority target area.
- b. Capacity savings goal (MW) required: Criteria (1 → 5 MW).
- c. Time duration to aggregate (MW) savings: Criteria (~5-yrs).

2.1.2 SUBMIT request to designated C&LM Supervisor to PERFORM a feasibility assessment of the Operating Company's request.

*Designated C&LM Supvr*

2.1.3 PERFORM a feasibility assessment of the Operating Company's request with consideration of all the following: **(Refer to Attachment 2 Checklist).**

- a. GATHER all applicable information pertaining to the proposed target area including market size and types of customers, status of previous C&LM measures implemented, etc.
- b. DETERMINE whether the proposed target area has sufficiently high % of C/I customers to be successful in attaining capacity savings goal.
- c. DETERMINE status of C&LM budget for C/I programs and ability to support target area capacity savings objective.
- d. DETERMINE if economy in proposed target area is conducive to C/I customers initiating projects needed to support capacity savings objective.
- e. GATHER available information from the Connecticut Clean Energy Fund (CCEF) or equivalent agencies in WMECO or PSNH territory pertaining to the level of PV installations planned for installation within the proposed target area during the requested time duration.
- f. GATHER available information from the appropriate C&LM Group pertaining to the level of existing Load Response under contract within the proposed target area during the requested time duration.
- g. DETERMINE if there are any other activities identified or under contract that will serve to reduce MW demand within the proposed target area during the requested time. For example: Emergency Generators; "Green City" initiatives; "Marshfield" type pilot programs; etc.

*Designated C&LM Supvr*

2.1.4 REVIEW completed feasibility assessment with C&LM SME.

*Appropriate C&LM SME*

2.1.5 PROVIDE C&LM's feasibility assessment results and recommendations to the Operating Company Requestor during an annual meeting with management representatives from Asset Management/System Planning/Field Engineering and C&LM/Marketing. The objective of this annual meeting is to establish agreement on recommendations for proposed targeted application of C&LM programs.

For CL&P, PSNH and WMECO, this annual meeting shall occur during May-June time frame subsequent to completion of feasibility assessment.

For Specific Requests submitted throughout the year, C&LM shall respond via email within 45-days of receiving the request.

a. If feasibility assessment is a "Go" determination, PROCEED with Step 2.2.

b. If feasibility assessment is "No-Go, Do Not proceed with Step 2.2.

Note: If C&LM savings can be achieved, at a minimum the feasibility assessment shall include the MW savings estimated by year.

## **2.2 Implement Proposed Target Application of C&LM Programs.**

*Appropriate C&LM SME*

2.2.1 ASSIGN designated C&LM Supervisor to IMPLEMENT proposed target application of C&LM Programs.

2.2.2 PROVIDE designated C&LM Supervisor with copy of results of the feasibility assessment of the Operating Company's request.

*Designated C&LM Supvr*

2.2.3 ESTABLISH core team of C&LM staff required to support implementation of proposed target application of C&LM Programs.

2.2.4 PERFORM target application of C&LM Programs with consideration of all the following elements:

a. DEVELOP targeted area marketing plan to meet the objective. Planning and implementation of the marketing plan will need to include Account Executive's (AE's) associated with the proposed target area.

- b. DEVELOP appropriate tracking and reporting system to support monitoring, tracking, and reporting MW savings accrued within the proposed target area during the prescribed timeframe.
- c. DEVELOP and IDENTIFY MW milestones to be reported during the prescribed timeframe.
- d. MONITOR, TRACK and REPORT MW Savings Progress on a Quarterly Basis to ensure capacity savings objective is met within prescribed timeframe.
- e. MAINTAIN close communication with C&LM Management; Operating Company's Asset Management or Field Engineering Department; and Load Forecasting Department during progress of the project to assess milestone progress, changes in the target area, etc.

**End of Section**

3. SUMMARY OF CHANGES

**Revision 0 (This is a new Procedure). Effective Date 6/25/10**

## **Attachment 1**

### **Engineering Information Requirements Needed for C&LM Analysis**

When requesting a feasibility assessment for a target area the following information should be included in the request and recorded in the project database of the respective operating company, i.e., Asset Management (CL&P), System Planning (WMECO), Field Engineering (PSNH).

- **Name of the substation, including:**
  - Nomenclature
  - Towns supplied by the substation
  - Circuits impacted in which load relief could help delay the proposed project.
- **Estimate year of load relief needed.**
- **One-line Map with the proposed relief area highlighted.**
- **Provide a brief description of the geographic area (include information that would provide C&LM with the primary drivers for your request. Include any known planned developments.**
- **For a Substation Project:**
  - Provide a total minimum target for the MW load relief needed in order to delay the project.  
  
(Example: If the substation normal peak load is 60 MW with a load growth of 1%, you may ask for an estimated load reduction expectation of about 0.6 MW to delay the project at least 1-year. Or, if any C&LM savings could help defer segments of the project, just note that any load relief would help to delay the project.
- **For a Feeder Project or Substation Project in which targeted efforts could help:**
  - A target MW load relief required to delay your proposed project. Or, if any C&LM savings could help delay segments of the project, just note that any load relief would help to delay the project.
  - List the circuits and/or circuit segments for which targeted C&LM could potentially delay the need for a feeder project. Specify the MW load reduction needed. To target a particular portion of the circuit, define the targeted area using the device sequence ID, street information, pole # and nomenclature (if appropriate).

## Attachment 2

### Feasibility Assessment Checklist

C&LM shall PERFORM a feasibility assessment of the Operating Company's request for a targeted application of C&LM Programs with consideration of all the following items:

- a. GATHER all applicable information pertaining to the proposed target area including market size and types of customers, status of previous C&LM measures implemented, etc.
- b. DETERMINE whether the proposed target area has sufficiently high % of C/I customers to be successful in attaining capacity savings goal.
- c. DETERMINE status of C&LM budget for C/I programs and ability to support target area capacity savings objective.
- d. DETERMINE if economy in proposed target area is conducive to C/I customers initiating projects needed to support capacity savings objective.
- e. GATHER available information from the Connecticut Clean Energy Fund (CCEF) or equivalent agencies in WMECO or PSNH territory pertaining to the level of PV installations planned for installation within the proposed target area during the requested time duration.
- f. GATHER available information from the appropriate C&LM Group pertaining to the level of existing Load Response under contract within the proposed target area during the requested time duration.
- g. DETERMINE if there are any other activities identified or under contract that will serve to reduce MW demand within the proposed target area during the requested time. For example: Emergency Generators; "Green City" initiatives; "Marshfield" type pilot programs; etc.

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

**Date Request Received: 12/04/2019**

**Date of Response: 12/18/2019**

**Request No. STAFF 3-001**

**Page 1 of 1**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson**

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**Request:**

Reference Company Response Staff 1-001 describing revisions to the distribution system planning procedures that have been adopted since the 2015 LCIRP. Please describe any revisions to distribution planning procedures the Company plans to implement over the next three years, including, but not limited to:

- a. Any planned move to company-wide procedures, throughout the Eversource jurisdictions;
- b. Any planned revisions to the Company's TD-190 or similar strategy documents which may incorporate energy storage; and
- c. Any move from the Company's PSSE platform to an alternative platform which might include non-bulk load and DER forecasts. Please include in your response when each revision is planned to take effect.

**Response:**

- a. The Company is developing a company-wide Distribution Planning Guide which will explain how the company performs planning studies and will include or reference all aspects of planning including load forecasting, bulk and non-bulk substation planning, circuit planning, and DER/Electrification penetration scenario planning.
- b. The TD-190 procedure is being retired. Evaluation of non-wires alternatives will be incorporated into the Distribution Planning Guide and is already included in technical solution alternatives and in project approval procedures.
- c. Eversource is adopting Synergi Electric - Power Distribution System and Electrical Simulation Software company-wide. Eversource NH presently uses Distriview for the radial and most of the 4 and 12kV portions of the system. Eversource NH System Planning will continue to maintain the PSSE model and use PSSE for some analyses for the foreseeable future, however, anticipates that Synergi will provide the capability to perform different types of scenario based distribution studies over time. A specific schedule has not been determined, but it is anticipated that the initial foundational deployment will be in 2020 with more advanced capabilities built on top over time.



## **ED-3022      Joint Planning Process for Wholesale Delivery Service**

*Page 1 of 6*

### **I. PURPOSE**

To establish an annual review process for the integrated least cost planning of wholesale delivery facilities for the mutual benefit of New Hampshire electric distribution companies and their customers.

### **II. AREAS/PERSONS AFFECTED**

This procedure applies to:

- PSNH Energy Delivery
- Unitil Energy Services (UES)
- New Hampshire Electric Cooperative (NHEC)

### **III. POLICY**

It is the policy of PSNH:

- A. To provide a reliable, cost effective, and efficient electric delivery system to meet customer needs while meeting regulatory and contractual requirements.
- B. To promote coordinated planning efforts that provide mutual benefit to the affected utilities and their customers.
- C. To insure a consistent approach for the planning of expansion and enhancements to local area systems.
- D. To recommend construction and operation of dedicated use and dual use facilities.

### **IV. DEFINITIONS**

Dedicated Use Facilities –Distribution Company facilities which provide electric service to a single company.

Dual Use Facilities - Distribution Company facilities which provide both retail and wholesale service to more than one company.

Joint Planning Committee – The planning committees set up to conduct annual planning meetings. There will be two committees, one including PSNH and UES representatives and one including PSNH and NHEC representatives.

Network Customer – An entity receiving transmission service pursuant to the terms of Northeast Utilities' Network Integration Transmission Service.

## **ED-3022      Joint Planning Process for Wholesale Delivery Service**

*Page 2 of 6*

NH Network Operating Committee – The committee comprised of all New Hampshire companies that are customers of Northeast Utilities Transmission system under an open access transmission tariff.

### **V. OVERVIEW**

PSNH will have a joint planning process to achieve coordinated planning of Distribution Company facilities. This process considers:

- The application of consistent engineering planning criteria applied to simulated system conditions based on agreed upon system data.
- The total cost of planned additions, including internal costs of each utility associated with such planned additions.
- The reliability impact of planned system additions and modifications.
- Operational considerations, system losses, and maintenance costs.
- The intent of the wholesale supply contract.
- Technical considerations for standardized designs and equipment.

The joint planning process will include an annual schedule of meetings intended to bring all parties together to coordinate individual company plans with a single “best for all” plan that potentially affects multiple companies.

It is expected that all Network Customers will have similar joint planning procedures to ensure coordinated efforts.

### **VI. PERIODIC REVIEW OF GUIDELINE**

The Procedure Owner is responsible for maintaining this guideline with respect to current and good engineering design practices, and consistent with the provisions of applicable wholesale supply contracts. The Procedure Owner for this Energy Delivery Procedure is the Supervisor of System Engineering unless otherwise designated by the Distribution Asset Manager.

Annually, the Procedure Owner shall review design guideline for conformance to standard engineering practices and industry criteria to determine if the guideline shall be revised, rewritten, or cancelled.

As required, the Procedure Owner shall recommend changes to the Director of Energy Delivery. If approved by the Director, the Procedure Owner shall change the Procedure in accordance with AP-2001 Writing and Publishing Procedures.

## **ED-3022      Joint Planning Process for Wholesale Delivery Service**

*Page 3 of 6*

### **VII. PROCEDURE**

#### **A. General**

The Joint Planning Committee shall include system planning representatives from PSNH and other applicable utilities.

The schedule, location, participation, and format for Joint Planning Committee meetings are subject to agreement by all parties.

#### **B. Guidelines and Design Criteria**

The Guidelines and Design Criteria to be used for individual company planning are the individual company documents as referenced in Appendix A. These reference documents are to be replaced by their most recent revisions.

Utility specific Design Criteria shall be utilized for planning of dedicated use facilities.

The Design Criteria of affected companies shall be utilized for dual use facilities. If there is a discrepancy between Design Criteria, the companies will mutually agree on the solution.

Peak load levels for all companies shall be determined individually by each company. A joint planning model will be created and shared with all parties as necessary for their analysis.

Financial models for comparison of options shall employ a Net Present Value methodology, identifying capital expenditures on an annual basis. An annual return on equity shall be used in the Net Present Value calculations and is subject to review and agreement by all parties annually.

System operating constraints and appropriate methods of evaluation shall be employed to determine preferred options. This shall include but not be limited to: operation and maintenance costs, system losses, environment, reliability, and power quality. These criteria will be mutually agreed upon.

Technical preference should be considered when evaluating alternatives. Technical preferences may include standard versus non-standard design. It may also refer to concerns such as age and condition of facilities, availability of spare parts, ease of maintenance, ability to accommodate future expansion, or ability to implement. These criteria will be mutually agreed upon.

## **ED-3022      Joint Planning Process for Wholesale Delivery Service**

*Page 4 of 6*

### **C. Meetings of Joint Planning Committee(s)**

It is the intention that the following meeting schedules be based on the need to provide input for each company's annual budgeting schedules and construction planning.

Meetings will be held annually in the month designated, or as required to resolve planning issues for annual budgets. Additional meetings may be scheduled as needed and mutually agreed.

The schedule, location, participation, and format for Joint Planning Committee meetings are subject to agreement by all parties.

#### **1. February Meeting**

The purpose of this meeting is to share load forecasts, identify areas requiring specific review, outline specific member requirements for further analysis, review operating assumptions and design criteria.

Between the February and April meetings, each utility will complete analysis and document any area of concern. These areas of concern shall be described and presented at the April meeting.

#### **2. April Meeting**

The purpose of this meeting is to review results of studies identified in the February meeting and make recommendations. Further need for studies will be identified. Agreement on financial models required for economic analysis shall be determined.

Between the April and June meetings, each utility will complete additional analysis on documented areas of concern. Focus should be on analysis of alternatives including scope, justification and estimated project costs.

#### **3. June Meeting**

The purpose of this meeting is to identify the outcome of studies, compare respective planning reports, and identify a list of recommendations for alterations to and new facilities. Each company shall have available, as a minimum, a 5 year plan for capital construction requirements of dual use facilities; and a 10 year conceptual plan for consideration and future discussion.. The results of this meeting will be used to develop joint recommendations.

## **ED-3022      Joint Planning Process for Wholesale Delivery Service**

*Page 5 of 6*

### **D.      Joint Recommendations**

Joint recommendations shall be documented as a result of the Joint Planning Committee effort. Included in the report will be:

- recommendations for a 5 year construction plan and 10 year conceptual plan of dual use and dedicated use facilities
- summary of potential planning issues and alternatives considered
- discussion of unresolved issues
- relevant changes from the previous year's recommendations

The Joint Recommendations Report should be circulated for approval by the end of August. This report will be finalized when accepted in writing by Senior Management of both companies. See Appendix B for an outline of the Joint Planning Recommendation Report Template. A separate report may be needed for each area of the Network Customers' systems.

### **E.      Annual Meeting of the Network Operating Committee**

PSNH will coordinate an annual NH Network Operating Committee meeting to be hosted by the Northeast Utilities Transmission Business. The annual meeting agenda will include:

1. Presentation by Transmission Planning Department to include relevant projects and studies over the next 5-10 years.
2. Follow-up on Action Items from Previous Meeting
3. Question and Answer forum including identifying a list of Action Items, as applicable.

## **VIII. APPENDIX A – REFERENCE DOCUMENTS**

PSNH ED-3002 Distribution System Planning and Design Criteria Guidelines. 1/10/03.

Unitil Service Corp. Electric System Planning Guide. January 12, 2004.

2003 Long Range Plan for New Hampshire Electric Cooperative.

NU Transmission Reliability Standards. Issued May 2000

## **IX.      APPENDIX B – JOINT PLANNING RECOMMENDATION REPORT TEMPLATE**

## ED-3022 Joint Planning Process for Wholesale Delivery Service

Page 6 of 6

### APPENDIX B:

#### JOINT PLANNING RECOMMENDATION TEMPLATE

The Joint Planning Committee has conducted the annual planning meetings in 20XX between PSNH and \_\_\_\_\_. The recommendations below are based on these meetings represented by planning departments at both companies.

##### Recommended 5 year construction plan:

Location/Area:

Company	Need Date	Description	Estimate (\$)

1. Relevant changes from the previous years' recommendations:
2. Summary of planning issues and alternatives considered:
3. Unresolved issues and plans to address them:

##### Recommended 10 year conceptual plan:

Location/Area:

Company	Need Date	Description	Estimate (\$)

1. Relevant changes from the previous years' recommendations:

The above Joint Planning Recommendations are accepted as meeting the needs of PSNH and \_\_\_\_\_ for long term planning of jointly used Distribution facilities.

\_\_\_\_\_  
Senior Management, \_\_\_\_\_

\_\_\_\_\_  
Date

\_\_\_\_\_  
Senior Management, PSNH

\_\_\_\_\_  
Date

*Public Service of New Hampshire:  
Operating Procedures*

*Effective Date: 05/27/05  
Approved By: J. G. Libby*

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

**Date Request Received: 10/10/2019**

**Request No. STAFF 1-004**

**Request from: New Hampshire Public Utilities Commission Staff**

**Date of Response: 10/24/2019**

**Page 1 of 2**

**Witness: Russel D. Johnson, Lee G. Lajoie**

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**Request:**

Reference Eversource 2019 LCIRP Bates 18-19 stating "Each year the company identifies non-bulk transformers that are loaded above 85% of the TFRAT or long-term emergency rating. A growth rate is applied (typically the same growth rate as the bulk substation that provides the supply) to determine if the transformer is expected to exceed its TFRAT rating within the next 10 years. For each transformer that is forecasted to exceed its TFRAT rating, it is determined whether load served by the transformer is a candidate for targeted energy efficiency which could be implemented to defer capital investment. Most of the transformers are not forecasted to exceed the TFRAT rating within the next ten years. A few of the transformers will be addressed with projects that are associated with asset condition and reliability. The results of this effort are summarized in the spreadsheet attached (Attachment E) with an explanation of whether targeted energy efficiency is a viable alternative to a more traditional investment."

- a. For the last five years, please provide any annual documentation developed by the Company pursuant to the Company's statement that "each year the company identifies non-bulk transformers that are loaded above 85% of the TFRAT or long-term emergency rating."
- b. Has the Company ever determined that load served by the transformer is a candidate for targeted energy efficiency which could be implemented to defer capital investment? If so, please provide that analysis. If not, please explain why not.
- c. Please explain how the Company makes the distinction between bulk transformers and non-bulk transformers.
- d. Please describe how the Company determines whether a deficiency is related to capacity, asset condition, or asset performance, providing an example for each.
- e. Please also describe any instances in which a feeder or circuit with a capacity constraint might be identified as deficient due to asset condition or asset performance.

**Response:**

- a. See Attachment Staff 1-004.
- b. The Company has not determined that load served by the transformer is a candidate for targeted energy efficiency which could be implemented to defer capital investment. The reasons include the following: Reductions in peak load forecasts removed the need, projects to address asset condition and reliability needs eliminated the forecasted overload (often due to a voltage conversion), an analysis of the station transformer resulted in a change in the transformer rating thereby eliminating the need.

- c. Bulk transformers are supplied by a transmission level voltage (115 or 345 kV), non-bulk transformers are supplied by a distribution level voltage (typically 34.5 kV)
- d. The Company identifies capacity deficiencies through the application of system planning criteria, asset condition deficiencies generally through inspection and testing, and asset performance generally through reliability analyses or operational performance.

Capacity (Peak Load) is an asset which is operating or forecasted to operate at a load above its normal rating under a basecase configuration. An example is a bulk transformer that has been measured or is forecasted to exceed its nameplate rating under basecase conditions. Capacity (Contingency) is an asset that is forecasted to exceed its emergency rating when under a contingency configuration. An example is a bulk transformer that exceeds its long-term emergency rating when restoring customers as a result of the failure of another bulk transformer.

Asset condition is typically an asset that is exhibiting signs of physical or electrical deterioration. Examples are distribution poles that fail inspection, substation transformers whose oil analysis indicate failing insulation, or underground cable that has experienced multiple failures.

Asset performance is not a term typically used at Eversource. Generally, this category is identified as Reliability. Reliability represents an asset that is performing poorly from a reliability perspective. An example is a radial circuit with poor SAIDI and SAIFI metrics. Obsolescence is also included in this category, which is typically an asset that is no longer supported technically or with spare parts. An example is a control or relay that is no longer supported by the manufacturer and replacement units are unavailable.

- e. The categories of asset condition and asset performance are independent of capacity constraint. Therefore, a feeder with poles or crossarms that fail inspection is a separate process than the determination of whether a feeder is constrained under basecase or contingency.



**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

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**Date of Response: 12/18/2019**

**Date Supplement Request Received: 12/19/2019**

**Date of Supplement Response: 12/20/2019**

**Request No. STAFF 3-003-SP01**

**Page 1 of 3**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson**

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**Request:**

Reference Company Response Attachment Staff 1-004, describing TD-190 C&LM Potential Distribution Projects from 2015-2019.

- a. Please confirm that pages 3 and 4 of 7 are actually 2016 data.
- b. Please explain why the number of potential projects changed from 16 in 2015 and 2016 to approximately half that amount in later years. If this was the result of a change in load forecasting methodology, please explain how the change in methodology impacts the number of projects which might qualify for review under the Company's TD-190.
- c. Please explain why in 2016 the Company had twelve circuits that were planned to exceed 100% of TFRAT in the next ten years but in the following year, 2017, the Company only had two circuits that were planned to exceed 100% of TFRAT in the next ten years.
- d. For those projects identified as C&LM candidates, including 11W1/11W2, 31W2, and 46W1, please provide any analysis the Company conducted surrounding conservation and load management projects pursuant to its TD 190.
- e. Please explain why in 2017-19, except for step additions at the River Road substation, the % of TFRAT doesn't appear to change, either by the 1-2.5 percent projected in years 1-5, or the 0.5 percent project growth rate in years 6-15 and as described later as the system-wide growth rate.
- f. Please explain whether the Company uses the most recent year's peak load, or a different historically observed peak load for forecasting substation-level peaks and growth rates and why.
- g. Please explain how the Company prioritizes non-bulk substation transformer replacements based on loading concerns. For example, if the Company prioritizes nameplate violations first, then N-1 violations second, and then 75% of nameplate third, please explain why. If the Company does not prioritize non-bulk transformer replacements based on peak loading in this manner, please explain why not.
- h. Please provide a similar explanation to the one requested in Staff 3-3(h) for bulk substation transformers.

**Response:**

ORIGINAL RESPONSE:

- a. As noted in response to Staff 2-007, the heading had not been updated on the 2016 version of the spreadsheet. The spreadsheet is the 2016 spreadsheet, for which little had changed from the 2015 version.

- b. The criteria which would drive a project to address loading on a non-bulk transformer is when the loading exceeds the long-term emergency (LTE) rating on transformer. The peak historical loading, forecasted growth rate, and transformer LTE rating determine whether a transformer is forecasted to exceed LTE. In all cases, the forecasted growth rate has been lowered in recent years which has pushed out the projected year to exceed the LTE. Also, in some cases the LTE rating was recalculated to reflect that cooling fans had been added to the transformer thereby lowering the percent of LTE (e.g. River Rd). In other cases, recently completed substation projects allowed the substation to be off-loaded or increased the capacity of the substation, significantly lowering the percent of LTE of the transformer.
- c. For clarification, the TD190 spreadsheet identifies transformers, not circuits. As noted in the response to 2-007, the heading should indicate transformers, and this was corrected in the later spreadsheets. Projected growth rates were lowered from typically 1.5 - 2% to approximately 0.5% from 2016 to 2019, pushing many projects beyond 10 years. As noted in part b above, other non-bulk transformers were dropped from the list due to substation projects which addressed the 85% of LTE criteria which is used as a trigger to be added to the list.
- d. No analysis was completed for the transformers identified. Black Brook (11W) loading was due to cold load pickup after an extended Line 310 outage. A more appropriate loading was used in the later years that did not incorporate that situation, and future loading will be reduced with projects planned at Messer Street and Weirs. Loudon (31W2) loading was barely above 85% and even that loading was due to a heat wave in 2012 occurring at the same time as a NASCAR race at Loudon. A project at Loudon was not anticipated. River Rd. (46W) loading was due to anticipated industrial load within 1 year. The transformer rating was updated to recognize cooling fans that had been added. This update alleviated any loading concern.
- e. The "% of TFRAT" is based on the long-term emergency rating of the transformer and the historical peak load. If the transformer does not establish a new peak, the % of TFRAT value would not change.
- f. The Company generally uses the historic peak load which has occurred in the past five years for non-bulk substations. In earlier versions of the TD190 spreadsheet, the forecasted peak used the historical peak and applied the growth rate from the year the peak occurred. With the lowering of forecasted growth rates and the high load years of 2011 and 2013 dropping off, more recent versions have used the five year historical peak applied to the most recent high-load year. The 2018 version applied the peak to 2016 since 2017 was a very cool summer, the 2019 version applied the peak to 2018. Peaks due to contingency switching or maintenance switching activities would not be used.
- g. Non-bulk substation transformer replacements would be prioritized in the following order. (This applies to transformers specifically. In many situations, there is a combination of loading, asset condition, and reliability concerns that may impact the priority):
  - 1) Transformer failure.
  - 2) Transformer inspection or test results indicate a short-term need to replace or retire the transformer.
  - 3) Transformer basecase loading exceeds the long term emergency rating.
- h. The Company assumes the question meant to say "...to the one requested in Staff 3-3(g)...".

- 1) Transformer failure.
- 2) Transformer inspection or test results indicate a short-term need to replace or retire the transformer.
- 3) Transformer basecase loading exceeds the nameplate rating.
- 4) N-1 transformer failure criteria as explained in SYSPLAN 010 (results in an extended outage to customers).
- 5) Transformer basecase loading above 75% nameplate.

SUPPLEMENTAL RESPONSE:

The Company is providing additional explanation to parts g and h.

- g. Non-bulk substation transformer replacements would be prioritized in the following order. (This applies to transformers specifically. In many situations, there is a combination of loading, asset condition, and reliability concerns that may impact the priority):

- 1) Transformer failure.
- 2) Transformer inspection or test results indicate a short-term need to replace or retire the transformer.
- 3) Transformer basecase loading exceeds the long-term emergency rating.

This planning criteria is the legacy planning criteria of PSNH. The Company has modified this criteria for bulk substations due to their greater number of customers served and greater transformer unit cost which corresponds to a potentially greater reliability and cost risk to customers. The planning criteria for non-bulk substations are currently being evaluated as the Company works to standardize planning criteria across the states which it serves and expects any amendments to be incorporated by Q3 2020.

The Company does not presently have a n-1 contingency criteria for non-bulk substations. These substations generally serve smaller numbers of customers and the strategy is to install a mobile sub within 24 hours in the event of a transformer failure. The 75% of nameplate loading criteria used with bulk substations does not apply since the 75% criteria is associated with respecting the calculation of the long-term emergency and short-term emergency ratings relied upon to meet the n-1 contingency criteria.

- h. The Company assumes the question meant to say "...to the one requested in Staff 3-3(g)...". Bulk substation transformer replacements would be prioritized in the following order. (This applies to transformers specifically. In many situations, there is a combination of loading, asset condition, and reliability concerns that may impact the priority):
- 1) Transformer failure.
  - 2) Transformer inspection or test results indicate a short-term need to replace or retire the transformer.
  - 3) Transformer basecase loading exceeds the nameplate rating. Transformers are an expensive asset which the Company wants to ensure experience a long and reliable life.
  - 4) N-1 transformer failure criteria as explained in SYSPLAN 010. A transformer outage will result in a lengthy outage to a large number of customers if the system does not have the capacity to restore those customers using the remaining transformation in the substation and/or using circuit tie capability.
  - 5) Transformer basecase loading above 75% nameplate. The 75% planning criteria is based upon the assumptions applied to the development of long-term and short-term emergency ratings. This criteria is the lowest priority of the criteria identified in this response since it does not impact the basecase (normal configuration) operation of the system and has a lesser impact on the ability of the system to respond during an n-1 transformer contingency.

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

**Date Request Received: 12/04/2019**

**Date of Response: 12/18/2019**

**Request No. STAFF 3-004**

**Page 1 of 1**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson**

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**Request:**

Reference Company Response Attachment Staff 1-005 describing the loading on various 4kV and 12 kV transformers. In some instances LTEs are: (1) significantly more than nameplate; (2) equal to nameplate; and (3) less than nameplate (e.g. – Drew Road, Hillsborough, Northampton, Nowell St., Stark Ave, Tate rd., and Warner). Please explain why this is the case.

**Response:**

- (1) Significantly more than nameplate. Long Term Emergency ratings are expected to be higher than nameplate. The percentage over nameplate is a function of the transformer characteristics (core weight, oil amount, etc) and, for the ratings provided in response to Staff 1-005, the load curve used to develop the ratings.
- (2) Equal to nameplate. This is typically due to the specific transformer not having been analyzed to determine a long term emergency rating.
- (3) Less than nameplate. This was simply a rounding typo which has since been corrected. It should be noted, that while this situation did not apply to what was provided, a value less than nameplate could be used if engineering and maintenance personnel determine that concerns over the health of a transformer warrant a lower rating.

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. 19-139**

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**Request No. STAFF 3-005**

**Page 1 of 1**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson**

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**Request:**

Reference Company Response Staff 1-006 providing various area planning studies, solution selection forms, and project authorization forms. Please provide a narrative explaining the Company's processes for determining when an area planning study, solution selection form, or project authorization form is developed, and how/when those documents are considered by Eversource's Project Authorization Committee.

**Response:**

Generally, an area study will be conducted as a result of either 1) a planning criteria violation identified during a loadflow study which applies the 10 year forecast to the electric system model or 2) an asset condition or reliability need which will require the retirement or replacement of electric facilities. The area study is intended to identify needs beyond just the initial criteria violation, asset condition or reliability need to ensure that the solution considers the various present and future needs. The area study includes input from substation engineering, substation maintenance, system operations, protection and control, among other groups. Once the area study is complete with alternatives and the preferred alternative, a Solution Selection Form is completed and brought to the System Design Committee (SDC) where it is presented and challenged. A proposed project may be required to consider other alternatives or provide additional information before it is approved. Once a large project (e.g. substation upgrade) is approved at SDC, initial funding is provided to allow engineering to be performed to refine the scope, review constructability and equipment outage constraints. If there is a change in scope or significant change in estimate due to this review, the project must go back to the SDC for approval before proceeding. Once the scope is well defined and a more detailed estimate is prepared, a Project Approval Form is prepared and presented to the Eversource Project Authorization Committee (EPAC) in order to get approval for partial or full funding.

**Public Service of New Hampshire d/b/a Eversource Energy  
Docket No. 19-139**

**Date Request Received: 10/10/2019**

**Date of Response: 10/24/2019**

**Request No. STAFF 1-002**

**Page 1 of 2**

**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Russel D. Johnson, Lee G. Lajoie**

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**Request:**

Reference Order No. 26,207 page 10 stating “Non-wires alternatives may be reviewed in various other dockets (rate cases, Least Cost Integrated Resource Plan (LCIRP) reviews, grid modernization proceedings) and, in each Electric Utilities' next LCIRP filing, each company will provide a grid needs assessment,” and Order No. 26,209 approving the settlement agreement in docket No. DE 17-189 which defines a Grid Needs Assessment as a filing “describ[ing] all forecasted grid needs related to distribution system capital investments of \$250,000 or more over a five-year planning horizon at the circuit level. The grid needs assessment shall be available in spreadsheet format and shall include the following attribute-based columns and content: (1) Substation, Circuit, and/or Facility ID: identify the location and system granularity of grid need; (2) Distribution service required: capacity, reliability, and resiliency; (3) Anticipated season or date by which distribution upgrade must be installed; (4) Existing facility/equipment rating: MW, kVA, or other; and (5) Forecasted percentage deficiency above the existing facility/equipment rating over five years. Upon filing of the LCIRP and associated grid needs assessment, Commission Staff, the OCA, and Liberty will review planned capital investments to identify candidates that may be appropriate for NWA opportunities.”

- a. Please provide the above-described grid needs assessment or explain why the Company does not plan to comply with Orders No. 26,207 within this LCIRP proceeding.
- b. If the Company does not plan to provide a grid needs assessment with this LCIRP, please explain whether the Company plans to comply with this requirement through its next LCIRP, pursuant to Order No. 26,262 which states “RSA 378:38 also contains a five-year filing requirement that runs from the date that a utility’s prior LCIRP was filed. Eversource filed its prior LCIRP on June 19, 2015. Thus, the five-year filing requirement would compel an Eversource LCIRP filing on or before June 19, 2020. This five-year requirement ensures that LCIRP filings occur at regular intervals regardless of the timing of the review and approval process at the Commission. We do not find that good cause exists to waive the five-year requirement at this time.” If the Company does not plan to comply with its commitment to file a grid needs assessment in its next LCIRP, please explain why this is the case.

**Response:**

- a. Eversource understands the commitment relating to the grid needs assessment as included in Order Nos. 26,207 (December 31, 2018) and 26,209 (January 17, 2019). In Eversource’s assessment, however, the requirement to provide that appraisal has been deferred by the Commission’s intervening action in Order No. 26,262 (June 14, 2019). In Order No. 26,262, the Commission found, in relevant part:

In conclusion, we grant Eversource’s waiver request, in part, and will not require a full LCIRP filing on August 25, 2019. We will require a more limited filing, however, and that filing must include

updates on the status of a number of specific deliverables required by our prior order approving Eversource's 2015 LCIRP....

**FURTHER ORDERED**, that Eversource shall file a more limited document consistent with this order, on or before August 25, 2019.

Accordingly, based upon the Commission's order, Eversource's filing on August 25, 2019 included updates on the status of the deliverables identified in the prior settlement consistent with the Commission's directive. The grid needs assessment was not among the items identified in the Commission's order as being required for the filing on August 25, 2019.

- b. Eversource intends to comply with all of its obligations relative to the filing of its next LCIRP and absent intervening Commission action relative to LCIRP filings, Eversource will comply with those obligations, including the requirement for a grid needs assessment.