



Docket No. DE 19-142
Commission Record Request
January 17, 2020

CORRECTED VERSION - January 24, 2020

Supplemental Exhibit 1 – Commission Record Request made during Prehearing Conference of January 9, 2020

The Commission asked for the monetary impact that implementation of 2018 N.H. Laws, Chapter 340 (SB 577) relating to the Burgess BioPower facility in Berlin would have on a typical Residential (Rate R) customer. Eversource responded to the Commission's requests on January 14, 2020.

Subsequently, Commission Staff and the OCA have suggested that instead of following the timing of the underlying PPA whereby above-market energy costs paid by Eversource to Burgess for energy during the PPA operating year would be recovered in rates in the following year, those costs should be recovered more-or-less contemporaneous with the payment of those costs by Eversource to Burgess.

This Supplemental Exhibit 1 updates the original response to describe how that change would be accomplished and the rate impacts thereof.

In the Company's routine SCRC filings, the above-market energy costs of the Burgess PPA are broken out as a separate line item. Since the \$100 M CRF cap was exceeded in September, 2019, all above-market energy costs that have been broken out in the Company's SCRC filings now also represent the amounts above the \$100 M CRF cap.

To effectuate this suggested cost recovery alternative, during the three-year CRF mechanism suspension period, the routine SCRC filing will no longer reflect the above-market energy costs of the Burgess PPA.

Instead, those above-market energy costs would be recovered via the equal-cents-per-kilowatt hour "Ch. 340 Adder".

Using this alternative methodology, for the current SCRC filing being considered in Docket No. DE 19-108 for effect on February 1, 2020, the forecast above-market Burgess energy costs for the upcoming SCRC year are \$28.309 million. This forecast amount and the CRF exceedance from the prior PPA operating year of \$5.267 million total \$33.576 million. The equal-cents-per-kilowatthour Ch. 340 Adder agreed upon by the Parties to the 2019 Burgess Settlement would be this total \$33.576 million cost divided by the forecast energy sales for the February 1, 2020 to January 31, 2021 period of 7,716,356 MWh resulting in a Ch. 340 Adder of 0.4351¢/kWh.

This methodology would lead to a calculation where Rate R customers would receive their 48.75% 2015 Settlement rate design share of the \$33.576 million CRF cap exceedance credit which would reduce the SCRC rate by 0.514¢/kWh¹, and would receive an increase of 0.435¢/kWh for the Ch. 340 Adder. This calculates to a net SCRC reduction for a Rate R customer of 0.0792¢/kWh² attributable to the Burgess PPA, SB 577 and 2019 Burgess Settlement. For a 600 kWh per month residential customer, the net benefit of the 2019 Burgess Settlement would be approximately 47.49¢ per month, but that customer

¹ $33.576 * 48.75\% / 3,183,531 \text{ Rate R kWh sales} = 0.514\text{¢/kWh}$

² The difference between the credit to Rate R customers on a per-kilowatt hour basis of the CRF cap and the Ch. 340 Adder's equal-cents-per-kilowatt hour rate.

would see an overall bill increase of \$2.61 per month due to the operation of SB 577. (I.E., without the 2019 Burgess Settlement, the typical Rate R customer would see a decrease of \$3.08 per month impact of SB 577).

February 1, 2020 SCRC Illustrative Impacts of CRF Operation, SB 577, and 2019 Burgess Settlement for Hypothetical Rate R Customer Using this Alternative Rate Recovery Methodology

Scenario Assumes 600 kWh/mo.	SCRC ¢/kWh Impact	600 kWh customer monthly bill impact
Without enactment of SB 577	Negative 0.514	\$3.08 bill decrease
With SB 577 but without 2019 Burgess Settlement	CRF credit would not be implemented	Customer would not receive the \$3.08 monthly bill decrease (hence, a \$3.08 increase impact)
With SB 577 and 2019 Burgess Settlement Using Alternative Rate Recovery Mechanism	Ch. 340 Adder of Positive 0.4350	\$3.08 increase due to operation of SB 577 Minus 47.49¢ benefit of 2019 Burgess Settlement Equals net increase of \$2.61

As discussed above, the forecast above-market Burgess energy costs for the current PPA operating year are \$25.688 million. If this same above-market cost is assumed to occur during each year of the three-year SB 577 suspension period, the total amount of PPA costs in excess of the \$100 million CRF cap that would need to be recovered in rates would be $\$25.688 \text{ M} \times 3 \text{ years} + \$5.267 \text{ M} = \$82.3 \text{ M}$. Assuming total deliveries each year of 7,716,356 MWh, the average Ch. 340 Adder cost to customers would be 0.356¢/kwh, and the average monthly cost of implementing SB 577 for a Rate R customer would be $0.356\text{¢/kwh} \times 600 \text{ kWh} = \$2.13/\text{month}$. Over the three-year time frame of SB 577 and holding all other rate elements unchanged in that time, the total rate impact on a typical Rate R customer would be in the magnitude of $\$2.13/\text{month} \times 36 \text{ months} = \77 .

CORRECTED VERSION - January 24, 2020 REDLINED

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To effectuate this suggested cost recovery alternative, during the three-year CRF mechanism suspension period, the routine SCRC filing will no longer reflect the above-market energy costs of the Burgess PPA.

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Using this alternative methodology, for the current SCRC filing being considered in Docket No. DE 19-108 for effect on February 1, 2020, the forecast above-market Burgess energy costs for the ~~current~~ PPA-operating/upcoming SCRC year are \$28.309 million. This forecast amount and the CRF exceedance from the prior PPA operating year of \$5.267 million total \$33.576 million. The equal-cents-per-kilowatt hour Ch. 340 Adder agreed upon by the Parties to the 2019 Burgess Settlement would be this total \$33.576 million cost divided by the forecast energy sales for the February 1, 2020 to January 31, 2021 period of 7,716,356 MWh resulting in a Ch. 340 Adder of 0.4351¢/kWh.

This methodology would lead to a calculation where Rate R customers would receive their 48.75% 2015 Settlement rate design share of the \$33.576 million CRF cap exceedance credit which would reduce the SCRC rate by 0.514¢/kWh¹, and would receive an increase of 0.435¢/kWh for the Ch. 340 Adder. This calculates to a net SCRC reduction for a Rate R customer of 0.0792¢/kWh² attributable to the Burgess PPA, SB 577 and 2019 Burgess Settlement. For a 600 kWh per month residential customer, the net benefit of the 2019 Burgess Settlement would be approximately 47.49¢ per month, but that customer

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As discussed above, the forecast above-market Burgess energy costs for the current PPA operating year are \$~~28.309~~25.688 million. If this same above-market cost is assumed to occur during each year of the three- year SB 577 suspension period, the total amount of PPA costs in excess of the \$100 million CRF cap that would need to be recovered in rates would be \$~~28.309~~25.688 M * 3 years + \$5.267 M = \$~~90.282~~82.3 M. Assuming total deliveries each year of 7,716,356 MWH, the average Ch. 340 Adder cost to customers would be ~~0.3896~~0.356¢/kwh, and the average monthly cost of implementing SB 577 for a Rate R customer would be ~~0.3896~~0.356¢/kwh * 600 kWh = \$~~2.342~~2.13/month. Over the three-year time frame of SB 577 and holding all other rate elements unchanged in that time, the total rate impact on a typical Rate R customer would be in the magnitude of \$~~2.342~~2.13/month * 36 months = \$~~84.77~~77.