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April 4, 2018

Debra Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 18-019
Keene Housing Request for Waiver of Puc 303.02

Response of Eversource

Dear Director Howland:

On February 7, 2018, Keene Housing submitted a request to the Commission for a waiver of Puc 303.02 relative to master metering. Keene Housing sought the waiver for the purposes of permitting it to master meter a series of buildings it manages in the Keene area. On March 29, 2018, the Commission issued a letter to Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") requesting that Eversource file a statement of its position on the request by April 4, 2018. Included below is Eversource's statement of position, as requested.

Any request for master metering has the potential to raise significant issues due to the specific limitations and prohibitions contained in Eversource's tariff and the Commission's rules, as well as any physical or electrical limitations of the property itself. The limitations in the Company's tariff and the Commission's rules have evolved over time and exist to strictly limit the grant of any waiver from Puc 303.02 to only those situations where they should be allowed under IECC 2009, and the Commission's own policies and positions taken over many years. Eversource's tariff language relative to metering has been revised and modified over time to ensure that Eversource remains in compliance with the Commission's rules and past policy and practice. The relevant section of Eversource's tariff reads as follows:

The Company will provide each Customer with proper metering equipment subject to the ability of the Company to obtain the same.

The Company shall own and maintain the metering equipment necessary to measure Delivery Service under this Tariff. Each meter location shall be designated by the Company and the Company shall have priority over any other entity with respect to placement of Company owned metering equipment.

Any Customer requesting non-standard metering equipment, the cost of which exceeds the cost of the metering equipment necessary for the rendering of Delivery Service under the applicable Rate Schedule, shall be responsible for the additional cost of the requested metering equipment including any incremental labor costs associated with installation of the requested metering equipment. Any such metering equipment must be approved by the Company.

Each unit of a new or renovated domestic structure with more than one dwelling unit will be metered separately and each meter will be billed as an individual customer. Where an individual household or business enterprise, occupation or institution occupies more than one unit of space, each unit will be metered separately and considered a distinct Customer, unless the Customer furnishes, owns and maintains the necessary distribution circuits by which to connect the different units to permit delivery and metering at one location of all the energy used.

Eversource Tariff, NHPUC No. 9, Original Page 15, Section 14 (emphasis added). Similarly, the Commission's rules provide:

- (a) No utility shall install master metering in a building with multiple dwelling units. The energy in each dwelling unit in such a building shall be separately metered.
- (b) A utility shall only install master metering in commercial buildings and as consistent with the International Energy Conservation Code 2009 as adopted pursuant to RSA 155-A:1, IV.
- (c) Hotels, motels, dormitories, boarding houses and time-sharing interests in condominiums as defined in RSA 356-B:3 shall not be considered a dwelling unit within the meaning of Puc 303.02(a) above.

N.H. Code Admin. Rules Puc 303.02.

The majority, if not nearly all, past requests to allow master metering have involved either new construction, or substantial reconstruction to an existing (sometimes "historic") building. In those instances, a developer was seeking to master meter because the function of the building would fully meet the exceptions contained in the Commission's rules. In many cases the developer was required to adjust the construction plan to allow for individual meters in the future if the function of the property ever changed such that a waiver would no longer be applicable.

In this case, the request by Keene Housing is unusual in that the relevant properties currently have individual meters in place that are billed monthly by Eversource. The position of Keene Housing is that because it currently receives and pays the electric bills for 189 housing units, a waiver of the master meter rule is appropriate. Permitting a waiver in such a circumstance would open the possibility that any existing customer with multiple tenants and individual meters could make the same request. If the Commission were to grant this request, it would effectively add a new exception to the existing rule, and future requests from other customers in the same situation would receive the same treatment.

Eversource has additional concerns regarding rate and engineering issues at the Keene Housing properties. Regarding the rate analysis, it does not appear from the cost savings estimates provided by Keene Housing that it understood that, if master metering was used, Eversource's Rates G or GV would apply to these locations, not residential service Rate R as was used in the cost savings estimates. A shift in rate designation would likely result in significant demand charges, as well as higher monthly customer charges. In addition to the additional demand charges, a number of the accounts are currently HeatSmart accounts, which are at a discounted rate, and which would be eliminated by the switch to master metering.

On the issue of HeatSmart, additional considerations must be addressed. For example, two buildings take service under HeatSmart and it is not clear how a waiver would line up with the work being done to replace the thermal storage units with heat pumps. To be on HeatSmart, a customer needs to have separately metered and controlled service and it is not clear that the shift to heat pumps would continue such service.

An additional significant issue is the amount of engineering and electrical work needing to be performed to convert these facilities to a master or primary meter set up. At this stage, it is not clear whether Eversource's engineering or operations personnel have been engaged by Keene Housing to determine the time, cost, or effort of accommodating the proposed changes. Pursuant to Eversource's tariff, Keene Housing would be required to pay the full cost of the engineering work to bring everything to one meter location for each facility - four locations and twenty buildings, including one building which is a 90 unit, multi-story building in downtown Keene. Eversource is aware that there are commercial tenants in this building. Also, one of the locations is fed via a single phase primary underground system that feeds at least four or five single phase pad mounted transformers. Keene Housing would have to pay Eversource for the full remaining undepreciated value of these transformers if primary metering is a consideration for this location. The primary underground system was recently replaced by Eversource, so the remaining value of the equipment will be high. The high-rise building is served from a shared three phase pad mounted transformer that serves not only Keene Housing but other commercial accounts and could not be primary metered.

Each location would require a study to truly understand what is currently connected and how the systems at each location tie back to the Eversource system. If this waiver was granted, Keene Housing would need to consider hiring an electrical engineer to complete this review and study. Because the distribution equipment at each location is beyond the present metering points, Eversource would not conduct the study of those systems.

For the above reasons, specifically the change in precedent that approval of the Keene Housing request would create, as well as the billing, metering, and engineering issues that would accrue if this request was granted, Eversource does not support the request for a waiver by Keene Housing in this case. Despite this position, Eversource does acknowledge and support Keene Housing's commitment to energy conservation and its efforts to reduce operating costs. The Company has previously worked with Keene Housing on common area lighting projects, a pilot heat pump project, and by performing weatherization projects in the residential units. Eversource's energy efficiency staff will commit to further discussions with Keene Housing to better understand its inventory of existing lighting, what the replacement plans are, and whether

there are any additional opportunities that will pass the NHSaves efficiency program cost-benefit tests and qualify for rebates.

In addition, Eversource has worked over the past year to develop a system for automatic uploads of billing data into ENERGY STAR Portfolio Manager. This new process should help to alleviate the time challenges related to pulling and analyzing usage data and may further assist Keene Housing in achieving the goals described in its waiver request. The energy efficiency staff is able to provide instruction to help Keene Housing begin automatic uploads.

If you have any questions, please do not hesitate to contact me. Thank you for your assistance with this matter.

Very truly yours,



Matthew J. Fossum
Senior Counsel

CC: Service List