STATE OF NEW HAMPSHIRE 1 2 PUBLIC UTILITIES COMMISSION 3 NHPUC 28JAN'19PM2:27 January 10, 2019 - 10:05 a.m. 4 Concord, New Hampshire 5 6 RE: **DE 18-073** 7 **EVERSOURCE ENERGY:** Annual Reconciliation of Energy 8 Service and Stranded Cost for 2017. 9 PRESENT: Chairman Martin P. Honigberg, Presiding 10 Commissioner Kathryn M. Bailey Commissioner Michael S. Giaimo 11 12 Sandy Deno, Clerk 13 14 APPEARANCES: Reptg. Public Service Company of New Hampshire d/b/a Eversource Energy: 15 Matthew J. Fossum, Esq. 16 Reptg. Residential Ratepayers: D. Maurice Kreis, Esq., Consumer Adv. 17 James Brennan, Finance Director Office of Consumer Advocate 18 Reptg. PUC Staff: 19 Suzanne G. Amidon, Esq. Richard Chagnon, Electric Division 20 21 22 23 Court Reporter: Steven E. Patnaude, LCR No.

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| 2 | | EXHIBITS | |
| 3 | EXHIBIT NO. | DESCRIPTION PAGE | NO. |
| 4 | 1 | Filing by Eversource Energy, consisting of the Testimony of | 6 |
| 5 | | Christopher J. Goulding, with attachments; Testimony of | |
| 6 | | Frederick B. White, with attachments; and Testimony of | |
| 7 | | William H. Smagula, with attachments (06-01-18) | |
| 8 | 2 | Updated filing by Eversource | 6 |
| 9 | ۷ | Energy, consisting of the | U |
| 10 | | Direct Testimony of Christopher J. Goulding, with | |
| 11 | | attachments (01-04-19) | |
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1 PROCEEDING

CHAIRMAN HONIGBERG: We are here this morning in Docket DE 18-073, which is Eversource's reconciliation docket of Energy Service and Stranded Costs for calendar year 2017.

Before we do anything else, let's take appearances.

MR. FOSSUM: Good morning,

Commissioners. And welcome back, Mr. Chairman.

Matthew Fossum, here for Public Service Company

of New Hampshire doing business as Eversource

Energy.

MR. KREIS: Good morning, Mr.

Chairman, Commissioners. I am D. Maurice

Kreis, the Consumer Advocate, doing business as

Don Kreis. I am here on behalf of residential

utility customers, along with my colleague,

Mr. Jim Brennan, our Director of Finance.

And I apologize for my voice, I'm just getting over a cold. That will have the salutary benefit of making me talk less and give ever briefer perorations this morning.

CHAIRMAN HONIGBERG: Note the date

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| Τ | and time. |
|-----|---|
| 2 | MS. AMIDON: Suzanne Amidon, from |
| 3 | Commission Staff. With me today is Rich |
| 4 | Chagnon, an Analyst in the Electric Division. |
| 5 | Good morning. |
| 6 | CHAIRMAN HONIGBERG: All right. How |
| 7 | are we proceeding this morning? |
| 8 | MR. FOSSUM: The Company is here to |
| 9 | present a panel of witnesses this morning. And |
| 10 | I don't believe there are any other there's |
| 11 | no outstanding motions or anything of the like. |
| 12 | So, I think we're prepared to proceed with our |
| 13 | panel, unless anybody else has an issue. |
| 14 | CHAIRMAN HONIGBERG: All right. Why |
| 15 | don't we have the witnesses go to the witness |
| 16 | box. |
| 17 | Are there exhibits that are being |
| 18 | numbered, Mr. Fossum? |
| 19 | MR. FOSSUM: Yes. There are. We |
| 20 | have discussed with the other parties and have |
| 21 | marked with the Clerk for identification two |
| 22 | exhibits. |
| 23 | What has been marked for |
| 2 4 | identification as "Exhibit 1" is the Company's |

| 1 | June 1st, 2018 submission. And what has been |
|----|---|
| 2 | marked for identification as "Exhibit 2" is the |
| 3 | Company's January 4th, 2019 submission. |
| 4 | (The documents, as described, |
| 5 | were herewith marked as |
| 6 | Exhibit 1 and Exhibit 2, |
| 7 | respectively, for |
| 8 | identification.) |
| 9 | CHAIRMAN HONIGBERG: Mr. Patnaude, |
| 10 | would you do the honors please. |
| 11 | (Whereupon <i>Christopher J.</i> |
| 12 | Goulding, Frederick B. White, |
| 13 | and William H. Smagula were duly |
| 14 | sworn by the Court Reporter.) |
| 15 | CHAIRMAN HONIGBERG: Mr. Fossum. |
| 16 | MR. FOSSUM: Thank you. |
| 17 | CHRISTOPHER J. GOULDING, SWORN |
| 18 | FREDERICK B. WHITE, SWORN |
| 19 | WILLIAM H. SMAGULA, SWORN |
| 20 | DIRECT EXAMINATION |
| 21 | BY MR. FOSSUM: |
| 22 | Q I began with Mr. Smagula yesterday, and I see |
| 23 | no reason not to do so again. |
| 24 | Mr. Smagula, could you please state your |

name, your position, and your responsibilities 1 for the record. 2 3 Α (Smagula) My name is William Smagula. I am a member of the public, who is a former Vice 4 5 President of Operations and Maintenance for our 6 Public Service of New Hampshire generating 7 plants. I retired from the Company's service at the end of August of 2018, however have been 8 retained as a consultant by the Company to 9 10 assist with fossil and hydro, regulatory, and 11 other business matters. 12 Thank you. And, Mr. White, could you also Q 13 please state your name, position, and 14 responsibilities for the record. 15 Α (White) My name is Frederick White. I am 16 employed in the Electric Supply Department of 17 Eversource Service Company, and based in 18 Connecticut. Our responsibilities include 19 running solicitations for Energy Service and 20 management of PPAs and independent power 21 producer rate orders. Prior to divestiture, 22 our group supported the management of and 23 analysis of the portfolio of loads and 24 resources that served Energy Service customers,

```
1
         for regulatory purposes of rate-setting and
 2
         cost reconciliations.
 3
         Thank you. And, Mr. Goulding, the same
    Q
 4
         question to you.
 5
         (Goulding) My name is Christopher Goulding.
 6
         I'm employed by Eversource Energy, in
 7
         Manchester, New Hampshire. I'm in charge of
         New Hampshire revenue requirements. And in
 8
         that role I'm in charge of revenue requirement
 9
10
         calculations associated with the New Hampshire
11
         distribution rates, Energy Service rates, and
12
         Stranded Cost Recovery Charge rates.
13
         Thank you. Turning back to Mr. Smagula, did
14
         you, back on June 1st, 2018, submit testimony
15
         in what has been premarked for identification
16
         as "Exhibit 1"?
17
         (Smagula) Yes, I did.
    Α
18
    Q
         And was that testimony prepared by you or at
19
         your direction?
20
         (Smagula) Prepared both by me, with assistance
21
         from other experts in the Company.
22
         And do you have any changes, updates or
23
         corrections to that testimony this morning?
24
          (Smagula) Yes. I have three minor edits which
    Α
```

I would like to bring forth today. If I may proceed to identify the specific areas on my testimony:

On Bates Page 093, there is a large table listing a number of the lengthy forced outages of the generating units. The last one, "OR-11", indicates that it occurred related to Merrimack 2. It should be Newington. "MK2" should be changed to "NT", a typographical error.

The next would be on Bates Page 098.

There is a table on Bates Page 098. Halfway down the table it shows an outage for Merrimack Unit 1, which begins on "October 23rd", and is noted as ending on "November 20". That "20" should be changed to "30". The outage ended on November 30th.

The third and last edit I would like to bring to everyone's attention is on Bates Page 111. This page shows a listing of all outages that occurred with Schiller Unit Number 5. The last item identified, which is Row V, should be deleted. That was, in fact, not an outage. It was inappropriately miscoded when tabulating

```
[WITNESS PANEL: Goulding|White|Smagula]
 1
         the work, and it was actually a load reduction.
         So, it should not have been noted there as an
 2
 3
         outage.
               Those are the only edits I have to my
 4
 5
         previously filed testimony.
 6
         Thank you. And subject to those updates, do
    Q
 7
         you adopt this testimony as your sworn
 8
         testimony for this proceeding?
         (Smagula) Yes, I do.
9
    Α
10
         Mr. White, did you also, back on June 1st of
    Q
11
         2018, submit testimony in this proceeding in
12
         what has been premarked for identification as
          "Exhibit 1"?
13
14
          (White) Yes.
15
         And was that testimony prepared by you or at
    Q
16
         your direction?
17
    Α
          (White) Yes, it was.
18
    Q
         And do you have any changes or updates to that
19
         testimony?
20
         (White) I do not have any changes.
         And do you adopt that testimony as your sworn
```

- 21
- 22 testimony this morning?
- 23 (White) Yes. Α
- 24 Finally, Mr. Goulding, did you also, back on Q

```
1
         June 1st, 2018, submit testimony in what has
 2
         been premarked as "Exhibit 1" this morning?
 3
    Α
         (Goulding) Yes, I did.
         Will you be adopting that testimony this
 4
    Q
 5
         morning?
 6
         (Goulding) No. There were some updates that
 7
         needed to be made to the testimony. So, I
         won't be adopting that testimony.
 8
         So, turning then, Mr. Goulding, did you submit
9
    Q
10
         revised testimony on January 4, 2019, in what
         has been marked as "Exhibit 2"?
11
12
         (Goulding) Yes, I did.
    Α
13
         And was that testimony prepared by you or at
14
         your direction?
15
    Α
         (Goulding) Yes.
16
    Q
         Do you have any changes or updates to that
17
         testimony this morning?
18
    Α
         (Goulding) No, I do not.
19
         And so, this morning do you adopt the testimony
    Q
20
         in Exhibit 2, in place of that which had been
         filed and included in Exhibit 1?
21
22
         (Goulding) Yes, I do.
    Α
23
         Thank you. So, let's deal with the big issue
    Q
24
         first then. Please, Mr. Goulding, could you
```

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Α

explain the reasons for filing new testimony in this proceeding in what has been marked as "Exhibit 2"?

(Goulding) Okay. So, through the process of discovery, certain adjustments to the lead/lag study were identified. And those adjustments were adjusted in the Exhibit 2. These adjustments are as follows:

The collection lag has been updated to reflect 2016 data for REC purchases and sales. Four of the payments related to purchases of RECs from Burgess and Lempster need to be modified for the payroll lag. The payment of incentive payroll in the month of March was separated from the weekly payroll payment, and the service date associated with the payment was modified.

For the NWPP Renewable Energy Certificates lag, the calculation was updated to reflect 2016 data to reflect actual activity associated with the NWPP REC sales contract with United Illuminating and CL&P that begin in 2016.

And for property taxes lag, the midpoint of the property tax fiscal year for two towns

1 needed to be adjusted.

Q

These updates impacted the overall lead/lag, which had been flowed through Attachments CJG-6 and CJG-4. The changes had the effect of lowering the overall working capital lag from what was filed on June 1st, 2018.

There had been some discussions with Staff, after the discovery response was submitted, about how to address the updates I just mentioned. Whether a new filing or whether we discuss it at a tech session. But, since we did not have a tech session, we consulted with Staff informally, and determined that filing this updated version would be most appropriate. And I understand that Staff discussed this with OCA as well.

- So, understanding, sort of at a high level, the changes that were made, what are the effects of those changes on what had previously been filed as part of this reconciliation?
- A (Goulding) So, in this case, as I stated, the update has the effect of lowering the working capital lead/lag from what was initially in the

initial filing. Lowering that lag, in turn, lowers the working capital allowance included in rate base from what was initially calculated and included in Attachment CJG-4, from \$16.54 million, down to \$12.036 million. The lower amount in rate base means that there is a lower generation cost to customers, as compared to the initial filing.

As the case with these reconciliations, there's no rate change that occurs directly from this filing. Instead, the results of this filing are incorporated into upcoming ES or into upcoming SCRC filings, and those changes would occur there.

so, in the SCRC docket, DE 18-182, where an update will be filed tomorrow, with a hearing scheduled for next week, this updated lead/lag will be incorporated into the SCRC rate proposed for effect February 1st. As all else being equal, this updated number would have the effect of lowering the rate from what it might otherwise be. Of course, there are other changes in the SCRC beyond this one. But, for purposes of this discussion, this is

```
1
         the impact of the update.
 2
    Q
         Thank you, Mr. Goulding. With that
 3
         understanding, what is the Company's request
         for this proceeding?
 4
 5
         (Goulding) So, Eversource understands that,
 6
         other than the issue I just discussed, there
 7
         did not appear to be any other major concerns
         with the reconciliation on the part of Staff
 8
         and OCA. Therefore, Eversource is asking that
9
10
         the Commission review and accept the material
11
         we have filed, including the update, as showing
         Eversource's actual, prudent, and reasonable
12
         cost of providing service in 2017.
13
14
                   MR. FOSSUM: Thank you. And that's
15
         what I have for direct this morning.
16
                   CHAIRMAN HONIGBERG: Mr. Kreis.
17
                   MR. KREIS: Thank you, Mr. Chairman.
18
         I have just a few questions for these fine
19
         witnesses, including private citizen Smagula.
20
         It's great to see him here in that capacity.
21
                      CROSS-EXAMINATION
22
    BY MR. KREIS:
23
         I'm going to start with Exhibit 1, and focus on
24
         Mr. White's and Mr. Smagula's testimony.
                                                    And
```

then I'll ask a few questions of Mr. Goulding related to Exhibit 2. And again, I apologize for my voice.

First, at the discussion of financial transmission rights, one of my ongoing obsessions, on Bates Page 080, of Exhibit 2, this is the last page of Mr. White's testimony. At Lines 12 through 14, Mr. White says "managing a portion of congestion cost risk with FTRs resulted in an overall decrease in Energy Service expense of \$670,613."

And my question for Mr. White is, how do we know that the Company couldn't have managed its FTR transactions even more prudently and save customers even more money than it actually did?

(White) What we do, when we operate in the FTR market, is we review historical congestion costs between our resource locations, our major resource locations, and the New Hampshire load zone.

Given how, from recent history, the market cleared for those congestion paths, and how congestion actually manifested in actual

operations, we review those two aspects. And from that, we make a judgment on what is a reasonable price at which we would choose to purchase FTRs.

We typically make the attempt to purchase the full quantity that we -- of megawatt-hours that we're going to believe we're going to move in the upcoming month from our major resource locations and the New Hampshire load zone. So, for example, if we don't believe Merrimack is going to operate in the following month, we won't purchase FTRs. There would be no reason.

So, to the extent we believe we're going to be moving megawatt-hours to our load, we will enter the market for that full quantity, and we will typically ladder our bids into that market at increasing prices. And again, that's based on our judgment of what the risk is, how congestion has actually cleared, and the opportunity to make those purchases based on, well, how it's actually cleared and what actual congestion turns out to be.

So, it's -- there hasn't been a robust investigation done in this docket. But we

```
1
         would -- we meet on a monthly basis within our
 2
         group, and get management approval for what we
 3
         determine to be reasonable interactions in that
 4
         market.
 5
         And you're satisfied that you're doing a good
 6
         job of managing that aspect of the Energy
 7
         Service expense that the Company incurs?
         (White) Yes, I am. I am satisfied.
 8
    Α
9
         Moving over to Mr. Smagula's testimony, and in
    Q
10
         particular looking at the discussion of "fleet
11
         availability", which appears at the bottom of
12
         Bates Page 087, and moves on to Bates Page 088.
13
              I wonder, Mr. Smagula, if you could talk
14
         about how the fleet availability during 2017
15
         compares to fleet availability from some
16
         previous years?
17
         (Smagula) Fleet availability for our fossil
18
         fleet and hydro fleet has, for recent years,
19
         been very, very good. We, as is indicated in
20
         testimony, during the 30 highest price days of
21
         the calendar year, our fleet equivalent
22
         availability was over 91 percent. Overall
23
         availability for the fossil fleet was over
24
         92 percent for the calendar year in equivalent
```

1 availability factor.

During the winter period, the January,
February, and March, when prices are often
highest, Merrimack 1 had an availability of
almost 92 percent, and Unit 2 almost
93 percent. Those are our lower price coal
units, and I think they were prepared to
operate.

The reduced capacity factors of our fleet in recent years, with the availability of shale gas, has allowed us to modify historic and traditional maintenance practices, which, for many of our units, was to review the operation of the equipment and anticipate problems or have a forced outage, repair it quickly, and get it on line.

With our units not running quite as much, we have had the ability to employ more analytical, proactive, preventive maintenance techniques, and take outages at periods when replacement power was zero, and use straight time efforts to try to minimize costs, so that we are best ready to run when the units were called to run.

```
1
              And I think, over the last five or six
 2
         years, that has been the case. And our
 3
         statistics I think have been very positive, as
 4
         compared to what they may have been 15 or 20
 5
         years ago.
 6
         So, in other words, you're being more -- you
 7
         were more strategic in 2017 than prior years,
 8
         with respect to lining up outages when the
9
         amount of revenue available would be very low,
10
         and making sure that the units were available
11
         to run at times of high cost power?
12
         (Smagula) Yes. We were more strategic in that
    Α
13
         regard. However, that doesn't mean we were not
14
         strategic in the past. The units operated
15
         differently, and we had to manage them
16
         differently.
17
         That makes sense.
    Q
18
         (Smaqula) Yes.
19
         On Bates Page 096 -- or 095, excuse me, and
    Q
20
         096, there's a -- well, I guess it's basically
21
         Bates Page 095, there's a discussion of some
22
         outages at Schiller Unit 5. And I,
23
         particularly with respect to the two that are
24
         discussed beginning at Line 17, and ending at
```

2

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Α

the end of that page, it seemed to me that those two outages came in close proximity to each other.

And I wonder if you could comment on whether that reflects some sort of operational problem that the Company could have managed better than it did?

(Smagula) I'd be happy to comment on that. The first item with regard to Unit 5 at Schiller had to do with an outage that occurred beginning on September 3rd, where the unit was removed from service for some planned maintenance. At that time, we did some work on our air heater. And whenever we're down for a period of more than five or six days, we do a full and thorough inspection of the cyclone components of the Unit 5 boiler, in order to make sure they are free and clear and are not plugged with any material. We do a full inspection of the boiler. We do a review of all of our rotating equipment, and any other items that have indication of concern.

So, a thorough outage was taken then. And I think we did a significant amount of

preventative and proactive work. That includes looking at boiler — the boiler furnace, the tubes. And we, during periods of length of that outage, we always not only conduct a visual inspection, but we do some partial testing of the tube material through the use of eddy current. There was nothing that indicated concerns with regard to tubing there. We did do some shielding and some other work, which was routine.

Unfortunately, with large mechanical pieces of equipment, that you cannot know everything about all of the thicknesses in all the locations of the miles of tubing in the boiler, we did experience, and frustratingly so, an outage that occurred on Unit 5 in September, a few weeks later. We did have some tube leaks in the furnace area. This was repaired. And a number of other tubes in the area were pad welded to improve the thickness of the material.

This -- Unit 5 is a very different boiler than all the other boilers in our fleet. And in order for the wood chips to burn in the

furnace, they're light and fluffy. And air is introduced to this furnace in the lower part of the furnace, so the fuel is introduced and air comes in from below. If all we had in the furnace was wood chips, the wood chips would below out of the furnace and plug our baghouse and go up the stack.

So, to maintain the wood in a combustion zone so that it can be burned, we introduce thousands of tons of sand. And so that the furnace is actually a chamber, which has a moving amount of tons of sand, mixed with the wood chips, in order to provide the combustion temperatures that are low to reduce nitrous oxide emissions, which is part of our permit requirement, but it allows the chips to stay in place and combust in this area.

And this motion of air and sand and chips causes much of it to fly over into what we refer to as "cyclones". There are five of them. And these cyclones will bring the heavy material back to the bottom of the furnace, whereas the lighter ash particles will go to a baghouse, be removed before emission up the

1 stack.

So, the point of my raising this is to illustrate that, within the furnace, there is a very abrasive atmosphere occurring, with sand moving, with air and chips, so that we have a very aggressive program on monitoring tube thicknesses to mitigate the risk of a tube leak. But that risk is always there in spite of our best efforts.

- Q So, basically, your testimony is that the proximity of those two outages was an unfortunate coincidence?
- 13 A (Smagula) Yes.
 - Q And there was another issue outage at Schiller
 Unit 5, moving to Page 97 of Exhibit 1, just a
 couple of months later, on December 15th. Is
 your testimony also that that additional
 outage, coming relatively soon after the two in
 September, was also just sort of normal
 operating exigencies?
 - A (Smagula) Yes. Typically, when we clean the cyclones to improve flow and reduce pluggage, we will often run that unit for three, four, five or six months before we start to have

Ι

1 those symptoms occur again.

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Α

However, there are times when, for certain reasons, these pluggages will occur. And we determined that, in mid-December replacement power costs were modest at that period, knowing we had some plugged cyclones, which will only get worse over time, we decided it was best to take an outage under a controlled situation, clean the furnace, clean out the pluggage, so that the unit would be in its best position to run with high reliability through the winter period, where we would experience higher prices and we would want to have higher reliability. And of course, you, being a perfect forecaster, knew, in December of 2017, that it was going to get wicked cold in early January of 2018? (Smagula) I wouldn't characterize myself as a strong forecaster. We just do our best, anticipating the worst in the future at all times. Indeed. Okay. I think I'm ready now to move along to Exhibit 2, and ask a few questions of Mr. Goulding.

And I apologize to you, Mr. Goulding.

```
1
         was not here yesterday, and this -- at least
 2
         the first few questions I have might relate to
 3
         some of what was discussed yesterday. And if
         I'm asking you to repeat yourself and being
 4
 5
         tiresome, I apologize.
              You testified, I think at -- this is on
 6
 7
         Bates Page 005 of Exhibit 2, that fossil fuel
         expenses were "$9.2 million higher than
 8
9
         forecast". That's Line 7, at Page 5.
10
              And I guess I'm wondering if you could
11
         talk about what the reasons are for that
12
         $9.2 million figure?
13
         (Goulding) I cannot, but my colleague,
14
         Mr. White, can.
15
         Okay.
    Q
16
         (White) What happened, as you referred to the
17
         coal prices that occurred in December, our
18
         forecast did not have prices that high. So, in
19
         our forecasts, our fossil fleet was not running
20
         a whole lot. And in actual, the cold weather
21
         brought our units on line, and so we had a lot
```

gigawatt-hours of coal generation, and about 20

more coal generation. This increased cost

mostly occurred in December. So, 100

22

23

24

```
1
         additional gigawatt hours at Newington, led to
         increased fossil fuel costs.
 2
 3
         So, basically, coal, rather than oil, with
    Q
 4
         respect to that?
 5
         (White) Newington burned oil. But the
 6
         Merrimack, the bulk of the increased generation
 7
         was coal-fired generation, yes.
         Would you say that the supply chain issues that
 8
    Q
9
         you've been having or were having accounted in
10
         any way for those increased costs?
11
         (White) No.
12
         So, no impact from the problems with the South
13
         American coal and Canadian Shipyard Lines?
14
         Again, these are things that I think were being
15
         discussed yesterday. And I'm really just
16
         trying to ascertain whether that had any impact
17
         on what we're talking about today, which is
18
         2017?
         (White) It did not. In fact, the coal yard was
19
    Α
20
         fairly full of coal at this time. I mean, a
21
         lot of the -- the discussion centered around
22
         the decreased demand for coal burn was more
23
         related to the CSL. We had plenty of coal
24
         on-site. It's just that we didn't anticipate
```

```
1
         the generation in our forecast. And as it came
 2
         to pass, our units ran.
 3
         Super. Thank you. Now, I think I can go back
    Q
         to Mr. Goulding and ask him questions that he
 4
 5
         can actually answer.
 6
              Looking at Bates Page 011 of Exhibit 2,
 7
         the very bottom of that page, at Line 25, Mr.
         Goulding testifies that "Eversource is
 8
9
         typically a net purchaser from ISO-New England,
10
         so it makes payments on Wednesday and Friday",
11
         and that therefore "produced a cost lead" --
12
         first of all, I think that, at Line 27, it says
13
         "cost of lead". I think the "of" is probably
14
         just a superfluous word. Do I have that right?
15
    Α
         (Goulding) Yes. That can be deleted.
16
    Q
         Okay. So, --
17
         (Goulding) And add it after, the word
         "of".
18
19
                 So, that just there's a transposition
    Q
         Right.
20
         there. So, what you really meant to say is
21
         "The ISO-New England payment cycle produces a
22
         cost lead of 7.1 days."
23
              And so, I want to make sure I understand
24
         that correctly. That simply assumes that
```

1 Eversource is always a net purchaser from 2 ISO-New England, does it? 3 I mean, the testimony says "Eversource is typically a net purchaser". But you calculated 4 5 that cost lead based on the assumption that it is always a net purchaser, it would appear to 6 7 me? (Goulding) I'm just trying to look to see if 8 Α that cost lead of 7.1 days is just being 9 10 applied to purchases. But it looks like it's 11 to the net energy market purchases. So, yes. 12 It is using 7.1 days. So, it's assuming it's 13 purchases. 14 Okay. Moving onto Bates Page 013, and focusing 15 on Mr. Goulding's -- well, at Line 9 of 16 Page 13, he answers this question: "How do the 17 Lead/Lag Study results compare to the historic 18 45 day convention?" And by "historic 45 day 19 convention", I believe you're referring to the 20 prior practice of simply assuming that there 21 was a 45 day payment lag that Eversource could 22 apply to its Energy Service expenses, correct? 23 (Goulding) Yes. Α

And at Lines 18 through 20, you say "The net

24

Q

```
1
         effect of applying the results of the Lead/Lag
 2
         Study is therefore an increase in cash working
 3
         capital requirements included in generation
         rate base from 9.653 million to
 4
 5
         12.036 million."
 6
              My first question is, where does that
 7
         "9.653 million" number come from?
         (Goulding) It's a calculation of the 45/365 of
 8
    Α
9
              But it doesn't appear in the schedules,
10
         because we have the updated lead/lag results
11
         calculating the working capital allowance
12
         that's in the rate base.
13
         So, in other words, your testimony is that, if
14
         we simply use the previous practice of applying
15
         a 45 day lag to Eversource's O&M expenses
16
         associated with Energy Service, that the amount
17
         in generation rate base would be 9.653 million?
18
    Α
         (Goulding) That's correct.
19
         Can you quantify the actual rate impact of that
    Q
20
         change from 9.653 to 12.036?
21
         (Goulding) It's roughly $200,000.
22
         And so, that's a relatively small amount of
         money in terms of the actual effect on a
23
24
         typical residential bill?
```

```
1
    Α
          (Goulding) Yes.
 2
         Have you decided what cash working capital
    Q
 3
         methodology you plan to use in your upcoming
         rate review?
 4
 5
         (Goulding) Yes. I think there's a PUC Rule
 6
         that actually originated the change from the
 7
         old 45/365 rule to a full lead/lag study
         needing to be performed for rate case purposes.
 8
         So, there will be a new lead/lag study that
9
    Q
10
         will be associated with the rate case that's
11
         upcoming?
12
         (Goulding) There will be one that's performed,
    Α
13
         yes, for the rate case that relates to the
14
         distribution side of the business.
15
         Can you talk about what steps the Company takes
    Q
16
         to manage its working capital needs?
17
              Do you do anything to control them, to
18
         keep them as small as possible?
19
         (Goulding) I guess I'm not sure I understand
    Α
20
         the question. Because the working capital
21
         allowance is based on a component of items, of
22
         O&M, purchases and sales. So, yes, we try to
23
         control O&M and can try to control any item
24
         that's -- that has somewhat control to it.
                                                      But
```

```
1
         there's property taxes, which impact lead/lag,
         which is outside of our control. So, there's
 2
 3
         some pass-through costs or costs that we incur
         that we don't have direct control over.
 4
 5
              So, we do, obviously, have some control
 6
         over the O&M, and we do attempt to come in with
 7
         the lowest O&M as possible to maintain a safe
         and reliable service.
 8
         I guess, really what I'm thinking about has to
9
10
         do with pursuit of payment, and at the same
11
         time strategically deferring amounts that you
12
         have to pay out to your vendors, so as to
13
         minimize the amount of working capital that you
14
         have to maintain in order to run this -- to run
15
         your business?
16
    Α
         (Goulding) And I'm not familiar with how our
17
         payment terms work with different vendors.
18
         assume they have certain terms that are set up
19
         that we have to follow.
20
                   MR. KREIS: Super. Mr. Chairman,
         those are all my questions.
21
22
                   CHAIRMAN HONIGBERG: Ms. Amidon.
23
                   MS. AMIDON: Thank you.
24
    BY MS. AMIDON:
```

```
1
    Q
         I believe this question is for Mr. White.
                                                      Ιn
 2
         Mr. Goulding's exhibits, he identifies a cost
 3
         associated with compliance with the Regional
         Greenhouse Gas Initiative. Do you know if the
 4
 5
         Company continues to have -- well, does
 6
         divestiture affect the Company's obligations
 7
         under the -- under RGGI?
         (White) I believe so, if RGGI is associated
 8
    Α
9
         with emissions from fossil-fired fuel plants.
10
         So, without those resources, I don't know where
11
         RGGI expenses would come in.
12
         That's the answer I expected. And so, I
    Q
13
         expected that we would see that phased out.
14
         But that's the answer I thought you would give
15
         me.
16
    Α
         (White) Yes. I don't, and Mr. Goulding may
17
         know more, whether things will continue on the
18
         books for a period of time. I don't know how
19
         settlement in that market, the timing of it.
20
         Right.
21
         (White) I'm not that familiar with it.
22
    Q
         It looks like Mr. Smagula wanted to say
23
         something.
24
          (Smagula) I just may also comment that, when
    Α
```

```
1
         you purchase capacity or energy in particular,
 2
         that generator has an obligation. So,
 3
         greenhouse gas expenses do creep into the cost
 4
         of energy, whether it's self-generated or
 5
         generated by another company.
              Certainly, the amount of CO2 emissions
 6
 7
         varies by the nature of the units and the fuel
         burned and so on. And so, I'm not sure you
 8
9
         escape it, other than perhaps from a nuclear
10
         facility or a hydro unit.
11
         But, if my understanding is correct, the
    0
12
         Company no longer has to purchase or
13
         participate in the auctions for the cred -- I'm
14
         not sure what it is, credits or what the
15
         terminology is.
16
    Α
         (Smagula) Yes.
17
         But you no longer have to participate in those
    Q
18
         auctions and pay those expenses, is that right?
19
         (Smagula) Yes.
    Α
20
                    MS. AMIDON: Okay. Thank you.
21
         That's all I had.
22
                    CHAIRMAN HONIGBERG: Commissioner
23
         Bailey.
24
                                   No questions.
```

CMSR. BAILEY:

```
1
                   CHAIRMAN HONIGBERG: Commissioner
 2
         Giaimo.
 3
                   CMSR. GIAIMO: Speaking of "marking
         the date and time", "no questions".
 4
 5
                         [Laughter.]
                   CMSR. GIAIMO: I would have lost the
 6
 7
         house on that one. I'm discombobulated,
         because I usually have at least a couple of
 8
         seconds. Or, should say "I'm more
9
10
         discombobulated".
11
                   Gentlemen, thank you for being here.
12
         A lot of these questions are just follow-up to
13
         yesterday, gaining a better understanding.
14
    BY CMSR. GIAIMO:
         So, yesterday we talked a little bit about the
15
16
         nuclear decommissioning and the DOE credits.
17
         We didn't see that in 2017, is that right, Mr.
18
         Goulding? No litigation credit, that is?
19
         (Goulding) Correct. There was no litigation
    Α
20
         credit in 2017.
         All right. Again, in 2016, there was a
21
22
         50/50 -- appeared to be a 50/50 split between
23
         generation and bilateral and spot purchases.
24
         At least that's what we heard yesterday. And
```

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```
1
         it looks like that's again the case in 2017.
 2
         Is that correct, Mr. White?
 3
    Α
         (White) That's correct.
 4
         Okay. On Page Bates 076, Mr. White, you talk a
    Q
 5
         little bit about market prices ranging between,
 6
         basically, $32 and $40 a megawatt-hour. Can
 7
         you explain what that might be a function of?
         And it's my understanding that that number --
 8
9
         those numbers represent, basically, the second
10
         lowest wholesale prices since Standard Market
11
         Design back in 2003.
12
         (White) Yes. I don't know where they rank.
13
         don't have trouble believing that. Throughout
14
         most of the year, it was a fairly low cost year
15
         in the energy market, and the figures you cited
16
         reflect that. Until we got to December, prices
17
         were quite low. And, in fact, you know, only
18
         January was above $36 before we got to
19
         December.
20
         Okay. You had mentioned, during a question I
21
         believe that was started with Mr. Goulding, but
22
         you mentioned that the $9.2 million expense
23
         was, basically, a function of operating in
24
         December when that was unanticipated. Did I
```

```
1
         hear that correctly?
 2
    Α
         (White) Yes.
 3
         The fuel costs?
    Q
         (White) That is correct.
 4
    Α
 5
    Q
         So, I guess I struggle to understand. Why
 6
         would you think -- why would you forecast not
 7
         running in December? It seems like that would
         be the only -- one of the few months I would
 8
         expect you to be running?
9
10
         (White) And I would say, typically, we base our
    Α
         forecast on quoted forward market prices. And
11
12
         in this situation, we would have been doing
13
         that in June. As we just discussed, to that
14
         point in time, it had been a very low priced
15
         year. And it just so happened that the forward
16
         market was trading, even in December, at fairly
17
         low prices. So, that's what we used in our
18
         forecast. We didn't come up with our own
19
         number and say "you know what, we think it
20
         might be higher and we might operate."
21
              We take that market information, in
22
         theory, from a broker market that's a liquid
23
         market. We use those prices and we dispatch
24
         our units against that price. And they were
```

```
1
         not forecast to run if the market was at that
 2
         price.
 3
              It didn't turn out to be that way, and so
         we did run. You know, our running offset
 4
 5
         higher prices. But, to the extent we were
 6
         buying from the market, those costs went up as
 7
         well.
         Okay. But the "$9.2 million" referenced on
 8
9
         Page 5 of Exhibit 2, that cost, like you said,
10
         would be offset by other benefits, having not
11
         to purchase in the spot market at higher costs?
12
         (White) Correct.
    Α
13
         Did you replace the coal associated with the
14
         burn that happened in December, do you know?
15
    Α
         (White) I do not believe we made any purchases
16
         of coal after that. Divestiture was imminent.
17
         Sure. Can we briefly talk about negative
    Q
18
         pricing? Were there times when prices went
19
         negative, but your resources were still
20
         running, i.e., were customers paying to stay
21
         running?
22
         (White) The only -- the only resources I'm
23
         aware of that would have run through a negative
24
         LMP period would be Burgess and Lempster.
```

```
1
    Q
         Okay.
 2
                       And I believe that did occur to a
    Α
         (White) Yes.
 3
         small extent, in particular with Burgess.
         I would imagine that resources that have long
 4
    Q
 5
         lead -- long ramps, ramp-up times, would be
 6
         caught in a situation where a negative price
 7
         may creep up for whatever reason, and then
         still have to run. So, it's not a bad thing.
 8
         I can see, operationally, why that would
9
10
         happen. And it sounds like you know at least
11
         of two resources where that does happen.
12
         (White) Right. I'm not aware that any of our
13
         own resources were faced with that. You're
14
         correct that our -- some of our coal facilities
15
         we would typically prefer to operate them for
16
         more than a day. They're not able to come off
17
         line quickly. Which also speaks to the idea
18
         that, when we believe they're going to be
19
         called, it's because we believe there are going
20
         to be high prices for more than a day.
21
              And so, like I say, I'm not aware that
22
         that happened with any of our own resources.
23
         But your point is well-taken. It could, if the
```

market were to change quickly over a short

24

```
timeframe.
 1
         Similar to Attorney Kreis, I am now learning
 2
    Q
         more about FTRs than I ever thought I would.
 3
         And I'm trying to get my hands around it. So,
 4
 5
         let me see if I can just summarize what
 6
         happened.
 7
              At auction, the Company spent about
         $830,000 on FTRs on ensuring a path for cheaper
 8
                 It eliminated about 1.5 million in
9
         power.
10
                 So, the net result was $670,000 in
         costs.
11
         savings to Eversource's ratepayers?
12
         (White) That's correct. And now, that figure,
    Α
13
         had we not participated in the FTR market,
14
         customers would not have gotten that $670,000.
15
         Right.
    Q
16
    Α
         (White) The fact is, the 1.5 million of
17
         revenues did occur. I mean, those were the
18
         actual costs of moving power from the specific
19
         location to the New Hampshire load. So,
20
         there's a few different ways you can look at
21
         it.
22
              But had we not participated in the FTR
23
         market, we would not have gotten that
24
         $670,000.
```

```
1
    Q
         In the utilization of FTRs and the insurance of
 2
         putting certain resources on at certain times,
 3
         does that flow through to wholesale costs?
         wholesale costs for the region get reduced as a
 4
 5
         result?
 6
         (White) I'm not sure I -- could you state that
 7
         again please?
         Sure. So, financial transmission rights allow
 8
    Q
         for -- account for congestion and basically
9
10
         ensure a path for resources to market.
11
         Presumably, those are lower cost resources,
12
         otherwise they wouldn't -- they couldn't afford
13
         to bid the FTR in?
14
         (White) I might describe it a little
15
         differently. The FTR market is a risk
16
         management market. I believe you're -- what it
17
         really allows a participant to do is fix the
18
         cost of moving energy from one location to
19
         another. Otherwise, it's a variable unknown
20
         expense.
21
              And so, yes. If you're a resource, and
22
         you know you want to move energy to a market
23
         where there's a potential profit opportunity,
24
         but you know your ability to cover the cost of
```

```
1
         congestion is limited to a certain amount, you
 2
         can go into the FTR market and ensure that you
 3
         get that path at below your breakeven price.
         So, it allows someone to convert a variable
 4
 5
         price risk to a fixed price.
 6
         Okay. And that -- would you link the FTRs with
    Q
 7
         the day-ahead?
         (White) Yes. FTRs are only the day-ahead
 8
    Α
9
         market mechanism.
10
         So, resources that are intermittent, that don't
    Q
11
         know if they're going to have fuel, the FTR
12
         market isn't something that they would
13
         necessarily utilize, because they don't know in
14
         advance whether or not they can actually --
15
         (White) Most of those type units cannot
    Α
16
         participate in the day-ahead market.
17
         So, one of the -- one of the benefits for
    Q
18
         resources in congested areas is -- one of the
19
         strategies is to buy the FTR to ensure you get
20
         to market, but also, in the process, could
21
         result in curtailments in real-time for
22
         resources that do not have --
23
         (White) They do not -- they are a virtual --
    Α
24
         they're a financial instrument, financial
```

```
1
         transmission right. So, they do not affect
 2
         actual dispatch. They are a hedging mechanism
 3
         for resources participating in the operational
 4
         market.
 5
         Okay. I certainly agree with that. And if you
         clear in the day-ahead, you limit the amount of
 6
 7
         space available in real-time for intermittent
 8
         resources. And if you clear the day-ahead,
9
         because you have a financial transmission
10
         right, effectively, the financial transmission
11
         right creates a market that creates a
12
         disincentive for intermittent resources to
13
         participate?
14
         (White) I think -- I think, yes. I think I get
15
         your line of thinking. And, yes, that can --
16
         it can play out that way.
17
         Yesterday I asked you about "uplift", and as
    Q
18
         we're talking about congestion, I'll ask it
19
         again. Do you know if there was any -- if
20
         there are any significant uplift payments made
         in 2017?
21
22
         (White) I don't recall any significant uplift
23
         events.
24
         Okay. Mr. Smagula, is it fair to say that 2017
    Q
```

1 was a good year for performance and for 2 availability, but it -- for your fossil units, 3 but not as great -- not as good a year as 2016? 4 As you may recall, Merrimack -- the Merrimack 5 units had, I think, a 98 percent EAF in 2016. (Smagula) The statistics of the effective 6 7 availability were a bit different, and in some cases a bit lower. But still very, very high 8 9 compared to what they had been when they were 10 running all the time. 11 However, I will say that the value to our -- the benefit and value to customers, with 12 13 them being available at the right time when 14 they were really needed, were still extremely 15 strong. 16 So, yes. The numbers change year to year. 17 But, in general, if you look at the plot of 18 them over many recent years, it's been very 19 strong. So, we were very proud of the results 20 from 2017, as in 2016. 21 You also mentioned that planned outages were --22 you "planned outages when the replacement power 23 was zero". Can you explain what you meant by 24 that?

| A | (Smagula) We have prescheduled outages with |
|---|---|
| | ISO-New England for known maintenance projects |
| | that are multiweek, sometimes two. Depending |
| | on the unit, it could be two, three, or four or |
| | more weeks. Those are fixed in the calendar |
| | going forward. |
| | |

But we have other planned outages, not scheduled with ISO-New England, that we do with one week or two weeks notice. We obtain prices, we obtain clearance from ISO. So, we do have other outages that are planned, but not officially scheduled with ISO.

So, sometimes we talk about them collectively. But they're all intended to take place when the units are not expected to provide the customer with service.

Q So, the net effect is zero?

- A (Smagula) The net effect is zero. And that's our -- continues to be our goal at all times.
- And in your testimony, you, as you said, has a chart that details the outages. I just want to make sure I understand. Were there any shortage event triggers that happened in 2016 [2017?]? Were your resources out at a

```
1
         time when, effectively, you had an obligation
 2
         to be running?
 3
    Α
         (Smagula) I don't believe there were any
 4
         shortages.
 5
         (White) I don't believe there were any in 2017.
 6
         (Smagula) No.
    Α
 7
                   CMSR. GIAIMO: Okay. Thank you very
         much.
 8
                   CHAIRMAN HONIGBERG: I don't have any
9
10
         substantive questions.
11
                   I just want to make sure we get the
12
         process right with Exhibit 1. Because it
13
         appears that the entirety of the first half,
14
         Mr. Goulding's part of Exhibit 1, has been
15
         replaced by Exhibit 2, is that right?
16
                   MR. FOSSUM: That is the intention,
17
         yes.
18
                   CHAIRMAN HONIGBERG: Okay. So, we'll
19
         just make that, that it's clear on the record.
20
                   Do you have any follow-up questions
21
         for the panel, Mr. Fossum?
22
                   MR. FOSSUM: I do not.
23
                   CHAIRMAN HONIGBERG: All right. I
         think you gentlemen can stay where you are.
24
```

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Without objection, we'll strike ID on Exhibits 1 and 2, with the understanding that Mr. Goulding's part of Exhibit 1 has been replaced by Exhibit 2.

If there's nothing else, we'll let the parties sum up. Mr. Kreis, why don't you start us off.

MR. KREIS: Thank you, Mr. Chairman.

I would like to take us on a trip back through memory, down memory lane, to the year 2000, when William Jefferson Clinton was still the President of the United States, and the New Hampshire General Court was adopting RSA 369-B:3, Paragraph IV, subparagraph (b), sub-subparagraph (1), sub-subparagraph (A).

That statutory provision sets out certain instructions to the PUC with respect to the finance order that it issued, which allowed Public Service Company of New Hampshire, now Eversource, to securitize the stranded costs and thereby restructure the Company. And of course, that Restructuring Agreement from 1999 has a sort of second wave in the restructuring, in the second Restructuring Agreement that was

adopted in Docket Number 14-238, that resulted in a second wave of securitization.

So, the point I'm making is that the Legislature has issued the PUC with instructions for what requirements to include in the securitization finance orders, and one of them is that the Company's Energy Service be based on the Company's actual, prudent, and reasonable costs. And up until this particular reconciliation, actual, prudent, and reasonable costs included a working capital requirement that covered only operation and maintenance expenses, and did not cover the costs associated with the power purchases by the Company.

So, what happened here is that the Staff prevailed upon the Company to do an actual lead/lag study to test the voracity of that "45 day" assumption. And it turned out that 45 days is really 17 days. But then the Company popped up and said "Oh, but, by the way, we haven't been recovering the working capital requirements associated with power purchases."

The Commission should not allow the Company to do that, because it is unfair to ratepayers. It alters the fundamental bargain that has governed the way PSNH recovers the cost of providing energy service that has gone forward since the year 2000 and the adoption of RSA 369-B:3.

1

2

3

4

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6

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10

11

12

13

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21

22

23

24

So, Bates Page 073 of Exhibit No. 2, which is the very last page of Mr. Goulding's submission, gives the Commission a road map for what it should do. Instead of allowing a total working capital of 12 million, or 12.036 million, the real number that the Commission should approve is the number in the first part of that schedule, which is actually \$4,140,000. That reflects the working capital allowance associated with O&M expenses reconfigured to reflect the Company's actual lead/lag results as demonstrated by the Lead/Lag Study that was submitted here. is what is reasonable within the meaning of the phrase "actual, prudent, and reasonable costs" in the circumstances that we confront here.

Now, a different result might obtain

50

1 going forward in the future totally 2 postdivestiture. But, while we're talking 3 about the period predivestiture, I really think the Commission has to be very careful about 4 5 "heads I win/tails you lose" kind of reforms 6 that allow the Company to sort of pop up out of 7 the blue and ask the Commission to add new expenses into the costs of Energy Service that 8 9 are then recovered from customers. 10 With that exception, I believe that 11 the testimony here today has amply demonstrated 12 that the Company did a reasonable and prudent 13 job of operating its generation fleet and 14 embarking on market transactions in the 15 regional wholesale electric market, such that 16 the price of Energy Service reflects prudent 17 operations by the Company. And the Commission 18 should therefore approve the Company's request, 19 subject to the exception that I just made, that 20 I just described before.

Thank you.

21

22

23

24

CHAIRMAN HONIGBERG: Ms. Amidon.

MS. AMIDON: Thank you. Staff has reviewed the filing. And we understand that

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the Company has prepared it as it has in the past, with the exception of the Lead/Lag Study. We think the results produce the actual, prudent, and reasonable costs incurred by the Company to provide Energy Service and stranded costs. And we request the Commission approve the Petition.

CHAIRMAN HONIGBERG: Mr. Fossum.

MR. FOSSUM: Thank you. I guess I'll start big and go small.

On the big tail [sic], I guess we would ask that the Commission accept and approve, to the extent necessary, this filing as reflecting Eversource's actual, prudent, and reasonable cost to providing service in calendar year 2017.

With respect to the lead/lag issue,
that, too, as presented, is the actual,
prudent, and reasonable costs of the Company as
presented. As noted in Mr. Goulding's
testimony, Exhibit 2, at Page 6, this was a
study that had been performed sometime ago and
presented, and was the subject of some
discovery, and eventually was included in

1 rates, because that was what we understood we 2 were supposed to do. 3 It's somewhat surprising to me, as I sit here this morning, to hear all of a sudden 4 5 that this analysis is improper and shouldn't be 6 accepted for application in this proceeding. 7 This thing has been pending in one more form or another for a number of years. And if there 8 9 were misgivings of that degree, this is the 10 first I'm hearing of them. 11 We believe the study, the way that it 12 was conducted, the items included in it, is 13 appropriate. That it reflects Eversource's 14 true actual, prudent, and reasonable costs. 15 And that it should be approved as submitted. 16 Thank you. 17 CHAIRMAN HONIGBERG: Thank you, 18 Mr. Fossum. 19 All right. If there's nothing else, 20 we will close the record, adjourn the hearing, 21 take the matter under advisement, and issue an 22 order as quickly as we can. 23 (Whereupon the hearing was 24 adjourned at 11:09 a.m.)