

November 20, 2019

NHPUC 20NOV19PM3:37

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

RE: Docket No. DRM 19-156
N.H. Code Admin. Rules Puc 1200, Uniform Administration of Utility Customer
Relations

Comments of Public Service Company of New Hampshire d/b/a Eversource Energy

Dear Director Howland:

Enclosed please find the comments of Public Service Company of New Hampshire d/b/a Eversource Energy in the above-captioned proceeding.

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

Very truly yours,



Matthew J. Fossum
Senior Regulatory Counsel

Enclosures
CC: Service List

Chapter Puc 1200 – Uniform Administration of Utility Customer Relations

Comments of Eversource

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) provides the below comments, edits, and suggestions on the draft Puc 1200 rules as contained in the initial proposal of September 10, 2019 in the instant docket. All page references are to the page numbers in the upper right of the document marked “Initial Proposal 8-28-19” and appended to the September 10, 2019 Commission filing in this docket.

1. Page 27 - 1204.03(a). The referenced rule contains a series of amounts of unpaid bills that define the financial thresholds after which utilities may send a notice of disconnection to a customer during the winter period. During the November 7, 2019 public comment session in this proceeding, the Office of Consumer Advocate (“OCA”) recommended that the Commission link those amounts to the rate of inflation or an inflation-related index. Eversource does not object to making reasonable revisions to the amounts specified in the rule, but raises a concern with tying those amounts to inflation or a related index.

Using such an index would result in recalculation of the relevant thresholds on some recurring basis. As each recalculation is done, the threshold would change, and a new number that does not appear directly in the rules would be applied. Eversource believes that this change could result in confusion for customers regarding the relevant threshold at any given time. Having a particular number in the rule provides a measure of certainty for both customers and the utilities. As noted, Eversource does not object to revising the relevant amounts, but would recommend that any revision be done in a manner that minimizes the potential for confusion.

2. Page 30 - 1205.01. In the Commission’s initial proposal, the referenced rule has been amended to apply the medical emergency rules to each customer’s “primary residence.” Eversource supports this change and, based upon the various working group sessions held in this docket, understands that the other utilities support this change as well. During the November 7, 2019 session, the OCA indicated that it did not support this change.

While Eversource understands that customers’ medical needs are not dictated by their location, it has become administratively unfeasible to track medical certifications for multiple locations. Historically, if a medically-certified customer had a vacation or secondary residence – which the customer may only visit intermittently and/or for short durations – the utility had to find a means of applying the medical certification to that secondary location. That would mean either: 1. having the medical certification follow the customer to any location the customer might be, which would lead to confusion and regular shifting of customer records among locations making it difficult for the utility to track, and difficult for the Commission to verify pursuant to Puc 1205.03; or 2. applying a blanket certification to multiple residences including a secondary

residence where the customer may be only an occasional visitor, and which may be occupied by non-medically certified customers when the medically-certified customer is not there. Eversource does not understand the intent of the medical emergency rules to be that they protect from disconnection any and every location where a customer with medical needs may spend time. Limiting the medical certification to the customer's primary residence is reasonable and appropriate and Eversource supports that amendment.