



**Public Service  
of New Hampshire**

<b>ORIGINAL</b>	
N.H.P.U.C. Case No.	DE 12-295
Exhibit No.	#20
Witness	Page 3
DO NOT REMOVE FROM FILE	

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The Northeast Utilities System

Matthew J. Fossum  
Senior Counsel

April 11, 2014

Christopher G. Aslin  
Bernstein, Shur, Sawyer & Nelson, P.A.  
670 N. Commercial St., Suite 108  
P.O. Box 1120  
Manchester, NH 03105-1120

RE: DE 12-295, Petition for Review of Certain PSNH Charges to Competitive Suppliers  
PSNH's Responses to ENH's Set 2 Data Requests

Dear Mr. Aslin:

In accordance with N.H. Admin Rule 203.09, please find attached Public Service Company of New Hampshire's responses to the second set of data requests of ENH Power in the above captioned docket. Hard copies will not follow.

Please do not hesitate to contact me with any questions.

Very truly yours,

Matthew J. Fossum  
Senior Counsel

Enclosures  
Cc: Discovery Service List

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014  
Request No. ENH 2-001  
Request from: Electricity NH

Date of Response: 04/11/2014  
Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Reference Joint Technical Statement at page 1-2, Section B: Please define the term "self-suppliers" as that term is used in the list of PSNH's Supplier Services employee's job responsibilities.

**Response:**

Self-supply service is defined in PSNH's tariff on page 8 as "Electric energy and capacity purchased by a Customer directly from the Independent System Operator of New England or the New England Power Pool."

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014  
Request No. ENH 2-002  
Request from: Electricity NH

Date of Response: 04/11/2014  
Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Reference Joint Technical Statement at page 3, Section E: Please explain the relationship between the proposed \$5.00 supplier default charge and the three charges at issue in the above captioned docket as set forth in the Supplemental Order of Notice: "the Selection Charge, the Billing and Payment Services Charge and the Collection Services Charge." Supplemental Order of Notice, DE 12-295 at 1.

**Response:**

Docket DE 12-295 is investigating the Selection Charge, Billing and Payment Services Charge and the Collection Services Charge that PSNH renders to suppliers taking consolidated billing services. In normal day-to-day operations, EDI almost always allows a smooth transition of customer accounts between suppliers to default service, or supplier to supplier. In the case of a supplier default, this occurrence is not a normal day-to-day operation. The supplier default charge, which is intended to capture those changes from normal practice, is a refinement of the selection charge, which is part of this docket.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014  
Request No. ENH 2-003  
Request from: Electricity NH

Date of Response: 04/11/2014  
Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Reference Joint Technical Statement at page 3, Section E: Please define with particularity the term "supplier defaults" as the term is used in Section E, and describe what constitutes a "supplier default" that would trigger the proposed \$5.00 supplier default charge.

**Response:**

PSNH defines "supplier default" as any instance where a competitive energy service provider no longer has the ability to provide such service to PSNH customers in NH. PSNH would render the \$5.00 charge per customer when that instance is triggered.

Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014  
Request No. ENH 2-004  
Request from: Electricity NH

Date of Response: 04/11/2014  
Page 1 of 3

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Reference Joint Technical Statement at page 3, Section E: Please explain the basis for applying the proposed \$5.00 supplier default charge on a per customer basis when a supplier defaults.

**Response:**

There are many costs incurred by PSNH when a supplier defaults in NH. Costs are not only incurred by overtime for billing and meter reading employees. Costs such as IT programming and lawsuits are also a cost of providing consolidated billing services to suppliers.

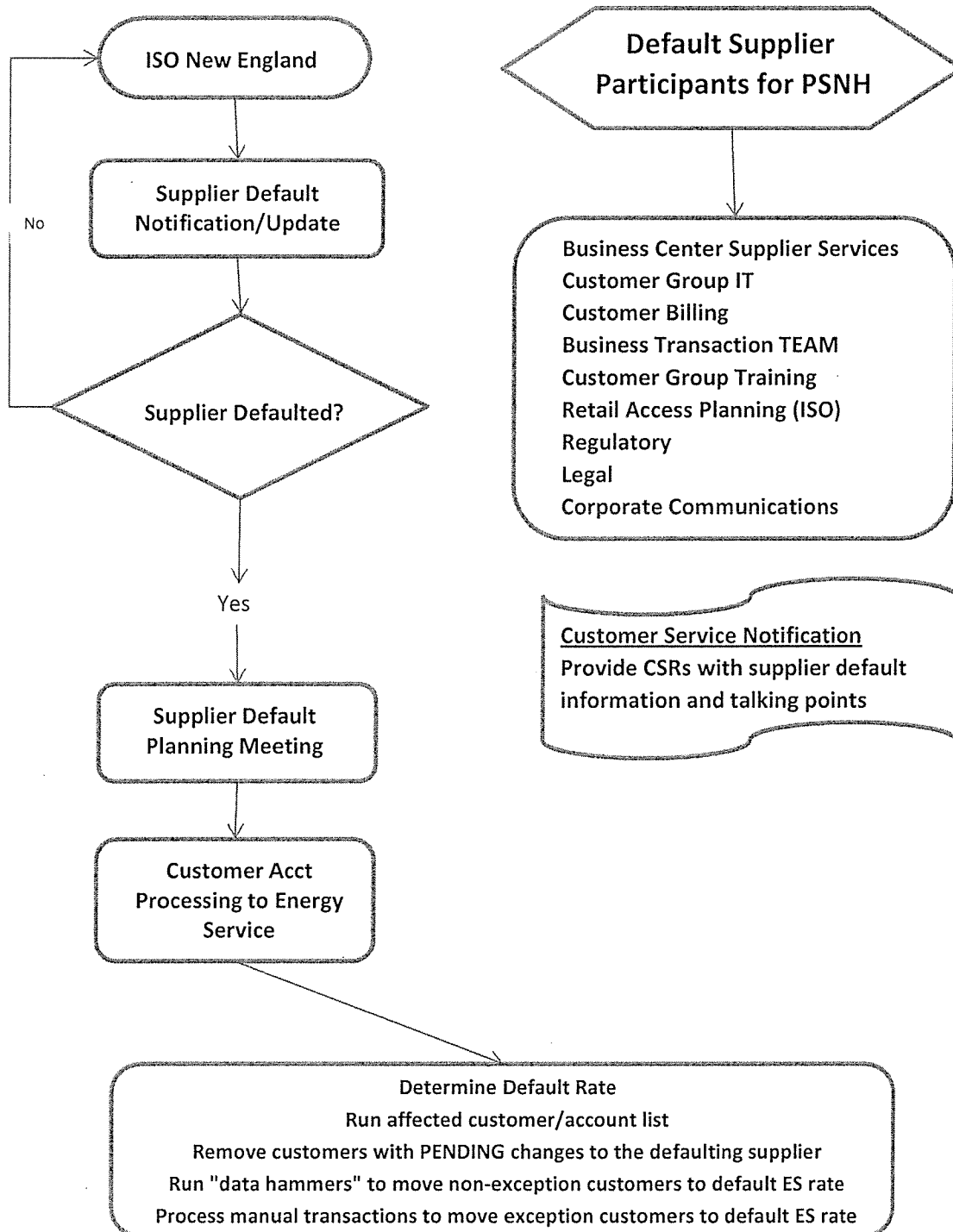
Attached is a chart showing a very high level description of how PSNH handles a single supplier default. There are many steps taken to ensure that any customer affected by a supplier defaulting has the correct billing information and charges. Many participants must be involved in the tedious task of handling a supplier default including IT, billing, regulatory, legal, corporate communications and customer service. A supplier default event team has been put together consisting of employees from these groups to be ready to handle all issues related to supplier defaults.

For large power PSNH customers (those with load greater than 100 kilowatts,) a billing employee must manually change the supplier back to default service for every customer affected as the billing system is not able to do so automatically when the customer's supplier is no longer able to serve that customer. For customers with load less than 100 kilowatts, accounts that are a. unmetered, b. coded Do Not Estimate, c. Budget billing, and d. net metered, can not be changed through automation. There is manual intervention to change the supplier in the case of a default.

In February 2013, PSNH/NUSCO personnel had to work through the holiday weekend in order to complete the tasks necessary to deal with PNE's default. The cost for NUSCO IT, customer service, legal personnel, and for special computer programming totaled \$38,570. These costs were incurred strictly to deal with the work necessary for PSNH to assume load responsibility at ISO-NE for PNE's load responsibilities, and to transfer the related retail customers from PNE to PSNH default service. These costs do not include costs associated with the load assumption process. See docket IR 13-233.

Most recently, PSNH has been subject to lawsuits in multiple jurisdictions as a result of the default of People's Power & Gas. PSNH was served as a 3rd party garnishee in Connecticut; it was served as a 3rd party trustee defendant in New Hampshire; and, it was named as a defendant in conversion, unfair trade practice, and for tortious interference lawsuit in Connecticut. Over 50 hours of attorney time has been spent on behalf of PSNH responding to these actions so far.

In comparison to the EDI transaction process which has little incremental costs associated, the supplier default process is very different from the normal switching that occurs. These types of costs are incurred every time a supplier defaults.



Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014

Request No. ENH 2-005

Request from: Electricity NH

Date of Response: 04/11/2014

Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Reference Joint Technical Statement at page 3, Section E: Please explain the cost basis used to arrive at a \$5.00 charge per customer when a "supplier defaults". Please produce any documents evidencing the cost basis for the proposed \$5.00 supplier default charge, including, but not limited to, any cost of service studies relied upon by PSNH.

**Response:**

Please see response to ENH 2-004.



Public Service Company of New Hampshire  
Docket No. DE 12-295

Date Request Received: 03/28/2014  
Request No. ENH 2-006  
Request from: Electricity NH

Date of Response: 04/11/2014  
Page 1 of 1

Witness: Charles R. Goodwin, Heather M. Tebbetts

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**Request:**

Reference Joint Technical Statement, Attachment 2, section 2(f) at page 4 of 4: Please identify each and every event that would constitute a Supplier default pursuant to proposed tariff Section 2(f).

**Response:**

Please see response to Q-ENH-2, 003.