1		STATE OF NEW HAMPSHIRE
2		PUBLIC UTILITIES COMMISSION
3		
4	May 25, 2016	- 2:04 p.m. MHPUC JUN20'16 AM 9:35
5	Concord, New	Hampshire
6		
7	RE:	DE 15-132 EVERSOURCE ENERGY:
8		Annual Reconciliation of Energy Service and Stranded Costs for 2014.
9		
10	PRESENT:	Commissioner Robert R. Scott, Presiding Commissioner Kathryn M. Bailey
11		Sandy Deno, Clerk
12		
13	APPEARANCES:	1 3
14		Hampshire d/b/a Eversource Energy: Matthew J. Fossum, Esq.
15		Reptg. Residential Ratepayers:
16		Donald M. Kreis, Esq., Consumer Adv. Office of Consumer Advocate
17		Reptg. PUC Staff:
18		Suzanne G. Amidon, Esq. Richard Chagnon, Electric Division
19		
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22		The state of the s
23	Court Repo	rter: Steven E. Patnaude, LCR No. 52
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1	PROCEEDING
2	CMSR. SCOTT: Good afternoon. We're
3	here for Docket DE 15-132, for Public Service
4	of New Hampshire doing business as Eversource
5	Energy's reconciliation between revenues and
6	expenses contained within Eversource's Energy
7	Service and Stranded Cost Recovery Charge rate
8	filing for the 12-month reporting period from
9	January 1st, 2014 through December 31st, 2014.
10	We'll start with appearance
11	importances.
12	MR. FOSSUM: Good afternoon,
13	Commissioners. Matthew Fossum, for Public
14	Service Company of New Hampshire doing business
15	as Eversource Energy.
16	CMSR. SCOTT: Good afternoon.
17	MS. AMIDON: Mr. Ionescu.
18	MR. IONESCU: Istrate Ionescu. I'm a
19	seasonal service person. I have some comments
20	dealing with that.
21	CMSR. SCOTT: Okay. Thank you.
22	MR. IONESCU: Thank you.
23	MR. KREIS: Good afternoon,
24	Commissioners. I'm Donald Kreis, the Consumer

Advocate, here on behalf of residential utility customers.

MS. AMIDON: Good afternoon. Suzanne Amidon, for Commission Staff. And with me today is Rich Chagnon, who is an Analyst in the Electric Division.

CMSR. SCOTT: Thank you. Since we have a member of the public here wishing to make a statement, why don't we start with that, and keep it relatively brief. And do understand this particular docket is a reconciliation docket, but we would love to hear what you say.

MR. IONESCU: Thank you, sir.

Appreciate it. This whole -- okay. This is a statement by a PSNH electric power customer to have the Commission consider lack of seasonal service provisions in the tariff for electric power.

Seasonal customers are not recognized in the tariff. Thus, PSNH treats seasonal customers in an unfair, capricious and arbitrary manner, extracting excess profits, inconsistent with Public Utility Commission

1 regulations.

As it stands, the tariff treats seasonal customers the same as regular customers. The tariff does not address needs of the seasonal customer. The monthly minimum is applied regardless of consumption. The monthly minimum skews significantly the cost per kilowatt-hour for this seasonal user because of low usage. Where usage is under 100 kilowatt-hour per month, the monthly fixed cost typically doubles the billed cost per kilowatt-hour to the consumer.

For example, monthly fees these days are \$12.75, and the cost per kilowatt-hour is 16.487 cents. Thus, for a seasonal user using 20 kilowatt-hour per month, which is rather typical for a low usage, total cost would be about \$16.04, or about 80 cents per kilowatt-hour for the supplied 20 kilowatt-hours.

The tariff does not have a 25 kilowatt-hour per monthly threshold, which is about \$3.00, to avoid fixed fees for low electric usage. Meter connect fees are \$35,

further raising the cost per kilowatt-hour.

For this seasonal user, PSNH charges excess

fees for low delivery of electricity.

The other option, to disconnect, faces re-connect charges and delays. And this is not in accordance with the spirit of the law and reflects PSNH unfair approach to seasonal customers.

Pursuant to RSA 369-B:3, IV

(b)(1)(A), customers taking power from PSNH are supposed to be billed "PSNH's actual, prudent and reasonable costs of providing power" as approved by the Commission. An example, in accordance with PUC Order Number 25,448, dated December 28, 2012, the cost of power is about 9 cents per kilowatt-hour. In contrast, PSNH charges this consumer a fixed \$12.75 even if consumption is a modest 20 kilowatt-hours per month.

This implies an excessive cost per kilowatt-hour. PSNH can do this, because the applicable tariff does not include provisions for seasonal customers, thus arbitrary and capricious fees cannot be challenged.

To rectify this, this customer petitions the Public Utility Commission to consider provisions for seasonal customers in the tariff.

PSNH's zero power consumption

threshold for seasonal accounts is against

public policy. Lack of a minimum threshold

discourages visits to a seasonal property and a

presence in New Hampshire. Because PSNH

suggests disconnecting power to avoid minimum

fees, owner visits to a seasonal property are

discouraged, encouraging thefts, break-ins,

vandalism. Reduced visits to New Hampshire

also reduce tourist income to New Hampshire

from that visit. PSNH current zero threshold

policy also frustrates energy saving measures

by the customer, suggesting the use of an

inefficient, small, emergency style generator

to avoid monthly fees.

PSNH's current arbitrary and capricious policies do not reflect historical precedent. Historically, a minimum threshold for power consumption was provided before a monthly delivery service was invoiced to allow

for short visits to the seasonal property.

PSNH's own historical precedents are not reflected in the tariff.

In view of the above, the Public

Utility Commission is hereby petitioned by this

customer to revise the applicable tariff to

reflect seasonal usage, institute a minimum

usage policy before fixed fees are charged by

PSNH. PSNH's approach of charging fixed fees

during no significant power delivery, being

defined as less than 25 kilowatt-hours per

month, is unfair, capricious and arbitrary.

This customer petitions to have the tariff require a minimum electricity monthly usage threshold before PSNH can invoice delivery service monthly fees are imputed. For example, if a usage of 200 kilowatt-hours (about \$33) was set before applying monthly fixed delivery fee [sic] charges, a balance may be achieved. This \$33 threshold would be commensurate with the minimum monthly fee of \$12.75. If the threshold minimum is not met during any month of the year, of course, the customer is to pay for cumulative total power

consumption on November 1st of the year, for example.

It should be noted that this consumer's dissatisfaction stems from paying very high kilowatt per hour prices because fixed charges are applied to low consumption. Fixed monthly charges should reflect power consumption, not an arbitrary value set to maximize PSNH profits. The required per kilowatt-hour parity is reflected in RSA 369-B:3, where customers taking power from PSNH are supposed to be billed "PSNH's actual, prudent and reasonable costs of providing power" as approved by the Commission, not some artificial monthly fixed charge, unrelated to power consumption. Thank you.

CMSR. SCOTT: For the record, can you give us your name, spell your name for the record.

MR. IONESCU: The name is Ionescu,

I-o-n-e-s-c-u. First name is I-s-t-r-a-t-e.

Do you need more than that?

[Court reporter interruption.]
MR. IONESCU: I'll give you a copy.

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1
         I can give you a copy of that. No problem.
                   CMSR. SCOTT:
 2
                                  Thank you very much.
 3
                   MR. IONESCU:
                                  Thank you.
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                   CMSR. BAILEY: Could we get a copy
 5
         for the Clerk?
 6
                   CMSR. SCOTT:
                                 That's what he just ask
 7
         for.
 8
                   CMSR. BAILEY: Well, he asked for his
9
         copy.
10
                   CMSR. SCOTT: Give one to the Clerk.
11
                   CMSR. BAILEY: Right. And, then,
12
         maybe we can treat it as a consumer complaint.
13
                   MS. AMIDON: Commissioner Bailey,
14
         Commissioner Scott, Mr. Ionescu did talk with
15
         Jody Carmody about filing this. If you think
16
         it -- if your recommendation to him is to file
17
         it as a complaint, then perhaps he could do
18
         that. He didn't make sufficient copies to meet
19
         the filing requirement today.
20
                   CMSR. BAILEY: Thank you.
21
                   CMSR. SCOTT: Why don't we do that.
22
         We'll treat that as a complaint, and if you
23
         could do so.
24
                                  Thank you. Appreciate
                   MR. IONESCU:
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1 it. 2 CMSR. SCOTT: Okay. So, thank you 3 very much. 4 So, moving into the docket at hand, 5 let me first ask, are there any administrative I gather, Mr. Fossum, you're going to 6 7 put a panel on, is that correct? MR. FOSSUM: Yes. That's correct. 8 9 CMSR. SCOTT: Okay. Are there any 10 administrative issues to be addressed up front? 11 MS. AMIDON: Yes. Staff would like 12 to clarify the record. Initially, when this 13 proceeding began, when the filing was made, 14 Staff anticipated that we would need an 15 engineering review, as we customarily do with a 16 reconciliation. And we asked that the

to clarify the record. Initially, when this proceeding began, when the filing was made, Staff anticipated that we would need an engineering review, as we customarily do with a reconciliation. And we asked that the proceeding be suspended for a period of time so we could obtain that review. As it turned out, after discussions with the Company, we determined that an engineering review was not necessary in this instance. As you will hear from the testimony of Ms. Tillotson, it was a very different year for Eversource, in terms of operating its generation units, due to the

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[WITNESS PANEL: Tillotson~White~Goulding]

1	continued low price of natural gas. But she
2	can provide a more complete explanation of
3	that.
4	So, Staff concludes that we did not
5	need an engineering review, and I apologize if
6	the record is not clear on that point.
7	CMSR. SCOTT: Thank you for that.
8	Mr. Fossum.
9	MR. FOSSUM: Thank you. We have a
10	I guess, if there's nothing further from the
11	Commissioners, we would have our panel seated.
12	CMSR. SCOTT: Please do so.
13	MR. FOSSUM: And, I would just note
14	for the record that I understand by at least
15	I think by agreement, what the Company's
16	initial filing from May 1st, 2015, by
17	agreement, would be "Exhibit 1".
18	CMSR. SCOTT: So marked.
19	(The document, as described, was
20	herewith marked as Exhibit 1 for
21	identification.)
22	MR. FOSSUM: And, so, with that, have
23	our witnesses.
24	CMSR. SCOTT: And, just to clarify,

[WITNESS PANEL: Tillotson~White~Goulding]

1	that's the binder with all three prefiled
2	testimonies?
3	MR. FOSSUM: That is correct, yes.
4	CMSR. SCOTT: Thank you.
5	(Whereupon Elizabeth H .
6	Tillotson, Frederick B. White,
7	and Christopher J. Goulding were
8	duly sworn by the Court
9	Reporter.)
L 0	ELIZABETH H. TILLOTSON, SWORN
L1	FREDERICK B. WHITE, SWORN
L 2	CHRISTOPHER J. GOULDING, SWORN
L3	DIRECT EXAMINATION
L 3 L 4	DIRECT EXAMINATION BY MR. FOSSUM:
L 4	BY MR. FOSSUM:
L 4 L 5	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the
L 4 L 5 L 6	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the line, if I could have, Mr. Goulding, if you
L4 L5 L6 L7	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the line, if I could have, Mr. Goulding, if you could begin by stating your name, your
L4 L5 L6 L7	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the line, if I could have, Mr. Goulding, if you could begin by stating your name, your position, and your responsibilities for the
L4 L5 L6 L7 L8	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the line, if I could have, Mr. Goulding, if you could begin by stating your name, your position, and your responsibilities for the record in this docket please.
L4 L5 L6 L7 L8	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the line, if I could have, Mr. Goulding, if you could begin by stating your name, your position, and your responsibilities for the record in this docket please. A. (Goulding) My name is Christopher Goulding.
14 15 16 17 18 19	BY MR. FOSSUM: Q. I'll begin as we usually do. Going down the line, if I could have, Mr. Goulding, if you could begin by stating your name, your position, and your responsibilities for the record in this docket please. A. (Goulding) My name is Christopher Goulding. I'm the Manager of Revenue Requirements for New

- Service, SCRC, Rate ADE, and some distribution rates.
 - Q. And, Mr. White, the same questions for you.

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- (White) My name is Frederick White. I'm a 4 Α. Supervisor in the Energy Supply Department. 5 6 primary responsibilities involve providing 7 analytical support of the portfolio of load and 8 resources used to provide default service in 9 New Hampshire for Eversource customers, for the 10 purposes of rate setting and cost 11 reconciliations.
- 12 Q. And, Ms. Tillotson, the same questions to you.
- A. (Tillotson) My name is Elizabeth Tillotson. I

 work in the Generation Department of

 Eversource. I'm responsible for facilitating

 regulatory and environmental filings and

 compliance, and otherwise strategies.
 - Q. I'll begin where we ended. Ms. Tillotson, back in the filing that's just been referenced, that was from May 1st, 2005 [2015?] and has been referenced as "Exhibit 1" in this proceeding, did you submit testimony and exhibits?
 - A. (Tillotson) Yes, I did.
- 24 Q. And that testimony, was that prepared by you or

16
[WITNESS PANEL: Tillotson~White~Goulding]

1 at your direction?

- 2 A. (Tillotson) Yes, it was.
- 3 Q. And do you have any changes or updates to that
- 4 testimony today?
- 5 A. (Tillotson) I do not.
- 6 Q. And, if you were asked those same questions
- 7 today, would your answers be the same today?
- 8 A. (Tillotson) Yes.
- 9 Q. And, Mr. White, did you also file testimony
- 10 that was included in what has been marked as
- 11 "Exhibit 1"?
- 12 A. (White) Yes.
- 13 Q. And was that testimony filed by you or at your
- 14 direction?
- 15 A. (White) Yes, it was.
- 16 Q. Or "prepared by you", I'm sorry. Prepared by
- you or at your direction?
- 18 A. (White) Yes.
- 19 Q. And do you have any changes or updates to that
- 20 testimony today?
- 21 A. (White) I do not.
- 22 Q. And, if you were asked the same questions
- today, would your answers be the same today?
- 24 A. (White) Yes, they would.

[WITNESS PANEL: Tillotson~White~Goulding]

- 1 Q. And, now, Mr. Goulding, did you file testimony
- 2 that has been included in Exhibit 1?
- 3 A. (Goulding) I did not.
- 4 Q. Well, could you explain who did?
- 5 A. (Goulding) Sure. Michael Shelnitz provided
- 6 testimony on the -- in the reconciliation of
- 7 energy costs for -- energy and SCRC costs for
- 8 2014. He has since moved on to a different
- 9 position within the Company. So, I'm here to
- 10 adopt his testimony.
- 11 Q. Did Mr. Shelnitz work for you at the time that
- his testimony was prepared and filed?
- 13 A. (Goulding) He did.
- 14 Q. And did he prepare this testimony at your
- direction?
- 16 A. (Goulding) Yes, he did.
- 17 Q. And have you reviewed the testimony that he
- 18 submitted?
- 19 A. (Goulding) Yes, I have.
- 20 Q. If you had been asked those same questions,
- 21 would your answers have been the same as
- 22 provided in that filing?
- 23 A. (Goulding) Yes, they would have.
- 24 Q. And, today, do you adopt Mr. Shelnitz's

[WITNESS PANEL: Tillotson~White~Goulding]

- 1 testimony as your own for purposes of this
 2 proceeding?
- 3 A. (Goulding) Yes.
- Q. Do you have any changes or updates to that testimony?
- A. (Goulding) Yes, one change. On Bates Page 002

 of my testimony, Line 4 -- or, Line 3 and 4, it

 says "Have you calculated replacement power

 costs as a result of outages incurred during

 the period as discussed in Mr. Smagula's

 testimony?" That should be "Ms. Tillotson's

 testimony".
- 13 Q. Do you have any other changes or updates?
- 14 A. (Goulding) No, I do not.
- 15 Q. Now, Ms. Tillotson, as you heard the Staff

 16 indicate earlier, is there generally a fairly

 17 in-depth engineering review that is undertaken

 18 in these dockets?
- 19 A. (Tillotson) Yes, there is.
- Q. And, in your experience, how generally is that done and what does that review encompass?
- A. (Tillotson) In past reconciliations, the Staff
 would hire an engineering consultant typically
 to come in, and the focus would be on reviewing

- the outages, forced outages, associated with not only the six fossil plants, the Schiller 5 biomass, and the hydro units, to review them and confirm that they have been handled well by the Company.
- Q. And, in this case, that more standard review was not done, is that correct?
- A. (Tillotson) That portion of the review was not done. What was done is we obviously did our filing, there were a couple of sets of data requests, which often captures some of the information that is then talked about during these on-site visits. But the on-site visits is what did not happen this time. We had discussed that information, though, with Staff, at their request, to go through and look at the filing to see what information is there.

And I did note that sometimes, if you're unfamiliar with the filing, that there's actually some helpful information in that. And we talked about that, so that, for those who maybe didn't recognize some of the terminology and what that might mean, I think we had a good opportunity to discuss that, and actually

gleaned a little bit more information from the filing that was submitted initially on May 1st, 2015.

Q. Well, in light of that, I guess we can enlighten the Commissioners. I was hoping and ask that you turn to, in your testimony it is Page 11, and it's Bates Page 059 of the filing. Are you there?

In the middle of the page, there is a chart that refers to "Planned Outages". Could you describe what it is that that chart shows and what that means relative to the operation of Eversource's generating units?

A. (Tillotson) Sure. As just a bit of a backdrop,

I would like to take us back just a little bit
in time, when the fossil plants had a very
clear mission, the market price was at a price
point that our coal plants usually ran all the
time, and they would have these planned outages
that we're going to see on this page. And the
one other outage type that they would have
would be the forced outage, in other words,
something broke that required it to come off
line. We would fix it as quickly as possible,

we would come back on, and then we would use these planned outages to do longer maintenance. And this setup of this filing really spoke to that. Because of operations beginning a little bit in 2010 and '11, and clearly in 2013 and '14, the market price, as we all know, was such that our coal plants would not run all the time. So, it was important to look at what the outages were under that kind of operation.

So, on Page 11, there's a list of planned outages that are very much like what you always would see at these units. It would be the routine planned work that we would set up with ISO ahead of time. We would know, we would actually, I'll say "save work", we would cluster work together to be very efficient about it, and we would plan ahead of time. So, we look at these periods as being preplanned and approved by ISO. So, this is very typical and consistent with past filings.

Q. And I'd like you now to turn back a few pages to Page 6 of your testimony on Bates Page 054, since you mentioned them in your response just then. There's a list of, what it says at the

top, the "NH Generation Steam Units Forced and Maintenance Outage List". Could you explain also what that chart is showing and what that indicates relative to generation operations in 2014?

A. (Tillotson) Sure. So, this is the chart that I think really demonstrates the change we've seen over the recent past. If you looked at much earlier reconciliation dockets, this list might have been much longer, depending on the year. It represents all outages for the Merrimack, Newington, Schiller, Wyman, that are either over 48 hours or over 96 hours. And, historically, those would have been forced outages, where the sense of urgency would have been to come back on line, because, during that period, we would be accruing replacement power costs, a cost to our customers.

Over the last few filings, it became clear that we had to do a better job of explaining forced outages, because "forced" would not be a term that would actually reflect the outages that were either over that 48-hour or 96 thresholds -- 48- or 96-hour thresholds.

So, we provided some additional information here that explains the type of outage. So, if you see a "tube leak" here, those, in the winter months, would feel very much like historical forced outages, where our job would be to find the problem, find the leak, and repair it as quickly as possible, especially because this was that Winter of 2014, where prices were high. So, we had a few outages at our Merrimack units. And I know, by what they typically take to have all of those under three days, means that we went in and we worked very fast to get back on line to again be providing value during the winter.

As you go down in this list, you see some other terms. You see a term "Maintenance Outage", you see "Reliability Outage". And what that's telling the reader is that a "Maintenance Outage" means that it didn't break and just take us off line, we had the flexibility to go in when it made sense. We would preplan it with ISO. We would work with wholesale marketing. We would find a time where we were hoping that replacement power

costs were zero. We would likely not work overtime and incur those costs. And we would, even though the availability would be less, it would be a lower cost to our customers.

"Maintenance Outage" still means there is something there that needed to be fixed. We have Air Heater pluggage that will occur, it will happen over time. So, we would go ahead and look for an opportunity to take the unit off so we have no replacement power costs.

Historically, those are the kinds of outages that an engineer consultant would want to be looking at to see if we were smart, and the questions that would have been asked historically is, you know, "Were you good at getting an outside contractor in?" "Were you fast at having your parts available?" All the questions that sort of spoke to doing it quick, because quick historically had been a better, lower cost option. Here, we may purposely take a longer outage, we'll purposely not work the weekend.

The other similar outage you see here is a "Reliability Outage". And those outages are a

little bit different than a maintenance outage, in that they don't have a specific item that's necessarily broken or needs repair, but it's a targeted outage where we want to be really ready for a expected higher need period. So, we'll do it in the fall, prior to the cold of the winter. We'll do them in the spring, prior to the hot of the summer. So, at that point, our priority is not being quick, but rather being thorough, thoughtful, and doing it at a lower cost by using our own manpower, hopefully not bringing in contractor labor.

So, as we discussed these aspects of the outages, we tested our theory of -- so, if it's a tube leak, that's kind of the traditional forced outage, but there were only a handful of those. The majority of these outages start with the term "Maintenance" or "Reliability", which is why, when you look at the replacement power costs that we calculate as part of the filing, you see an awful lot of these outages having zero replacement power costs. And that makes sense, that means, as we planned, we were correct. I mean, there's always a risk that

1 something could happen that you don't expect. But all of the ones that are listed here 2 3 that have that kind of terminology, in our coal plants especially, were done at zero 4 5 replacement costs. So, our goal was met. And I think the last note I'll make there 6 7 is, Schiller 5 is our biomass plant, and that is the one unit that truly still feels like the 8 9 old term "base load" unit. It's always below 10 market prices. We always operate that unit. 11 If it's available, we run it. We do do a reliability outage in the fall, so we're ready 12 13 for winter. It's not good to have an outage in 14 the winter there, if we can avoid it. But that 15 is the one unit where you should always see 16 replacement power costs associated with it, 17 because it is always going to be lower than 18 market prices. 19 CMSR. SCOTT: Ms. Tillotson, when you 20 talk about replacement power costs, are you 21 talking about Bates 009? 22 WITNESS TILLOTSON: I think that's

{DE 15-132} {05-25-16}

CMSR. SCOTT: Thank you.

correct. I just lost it. Yes.

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BY MR. FOSSUM:
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- Q. And for purposes of direct, just one more reference. Ms. Tillotson, if you can turn to Bates Page 070. It is Attachment EHT-1, Page 10.
- 6 A. (Tillotson) I'm there.
- 7 Q. And I just wanted to have you explain, if you could, on what is listed on the line for "Outage A" there. If you could, the -- is that a common length of an outage, I guess I'll ask first?
- 12 A. (Tillotson) No. That would certainly be picked up as something unique.
- Q. And, so, could you then, for the benefit of the Commissioners, please explain what happened there.
 - A. (Tillotson) I can. As I mentioned, we did have the opportunity to talk to Staff. And, as we looked through the filing and found so many things that were uneventful, probably without concern, something that you wouldn't have spent a lot of time if you had a consultant, appropriately this line item was identified as being different. What made this particular

[WITNESS PANEL: Tillotson~White~Goulding]

outage interesting is, if you note the start date here is "01/01/2014", the outage actually began mid-December 2013. And, because this outage was associated with a Schiller 5 very short outage, it ended up being talked about in the 2013 reconciliation.

Typically, you would go to the year that has the majority of the period associated with the outage. But, because it had a Schiller 5 outage that was fully contained in 2013, we went ahead and talked about it. So, that gave me an opportunity to revisit some of that during our discussion.

And this is where we did rotor work on our -- we rewound our rotor. Because of our December outage, we identified some problems that we wanted to inspect further. Because we were concerned, we actually found that the stator was okay, but that there was some concerns with the generator rotor. It was grounded. We removed the rotor at that time, and, in the December and January time period, removed it from the site. And what's interesting is, because we took it out then,

looking for a very specific targeted issue associated with the outage that occurred in December, our OEM, our field inspection shop, actually identified more concerns with the rotor at that time.

So, their recommendation was they could repair the targeted work, or their caution was that they had found some other significant issues with -- potentially significant issues with the rotor. And their recommendation was to go ahead and completely rewind the rotor then, and, in fact, probably avoid what could have been a catastrophic failure.

So, we did take the ten months to do all of that work. And we're hopeful that, not only did we produce a good work, but we avoided a catastrophic-type failure, which is always a more costly, harder-to-fix scenario.

So, the rotor was done then. There were some controls done then also. And we also did some control work on two other CTs that's contained here.

So, good work to be done, it needed to be done, and certainly avoided a catastrophic

failure. And it was done in a period where it

was less likely needed. Our CTs typically have

very important jobs to do at more critical

times. So, we did it in a period that we felt

was better to have it completely worked on and

have it all ready for the fall/winter of

2014-15.

- Q. And, so, generally, Ms. Tillotson, in your experience, and in light of what's in the testimony and what you've described, is it your opinion that the plant operations and outages and associated activities that are described for 2014, were they, in your opinion, reasonable and prudent operations by the Company?
- 16 A. (Tillotson) Yes.

- Q. And, very quickly, Mr. Goulding and Mr. White,
 I'll ask you sort of both together. Is it your
 opinion that the information that's provided in
 the filing relative to both your testimonies
 reflects Eversource's actual, prudent, and
 reasonable costs of providing service to
 customer in 2014?
- A. (Goulding) Yes.

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1
    Α.
         (White) Yes.
                   MR. FOSSUM:
 2
                                Thank you. They're
         available for cross.
 3
 4
                   CMSR. SCOTT: Thank you. Mr. Kreis.
 5
                   MR. KREIS: Thank you, Commissioner.
 6
                      CROSS-EXAMINATION
 7
    BY MR. KREIS:
         Ms. Tillotson, would it be fair to say that the
 8
         long outage that you were just describing at
9
10
         the Schiller Combustion Turbine 1 is sort of
11
         the utility equivalent of having to send your
12
         relief pitcher out for Tommy John surgery?
13
         (Tillotson) That could be an analogy, I
14
         suppose.
15
         I just have a few questions beyond that. Let
    Q.
16
         me go back to what Ms. Tillotson was talking
17
         about earlier, which is her chart, which is at
18
         Bates Page 054, I want to make sure I
19
         understand her testimony.
20
              If I understood you correctly, what you
21
         were saying is basically all of those outages
22
         that were identified as either a "maintenance
23
         outage" or a "reliability outage", were outages
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that the Company had some discretion with

- respect to scheduling, so that it really is not a traditional "forced outage", fair?
 - A. (Tillotson) Well said.

- Q. And, so, all of the outages on that list that are not either identified as a "maintenance outage" or a "reliability outage" are your old-fashioned forced outages?
- 8 A. (Tillotson) Correct.
 - Q. So, what would be the inference that one could draw from the fact that all of the old-fashioned forced outages, the tube leaks, all either involved Schiller Unit 5, which runs as an old-fashioned base load generation unit, or took place during the cold winter months?

 Is that just coincidence or is there any significance to that fact?
 - A. (Tillotson) I will remind you that this chart is a subset of all of the forced outages. If you go back in the filing in one of the attachments, there are other forced outages in the traditional sense. These are only those forced outages or maintenance outages or reliability outages that exceeded the 48 hours or the 96 hours. And that's really just being

respectful of the filing. Once you have that criteria met, then we go ahead and we put in outage reports as part of the filing requirement.

Had we left those reliability and maintenance outages out, then we would have had a very short list, and we would have just relied on the listing of all of the forced outages. And those tend to be the shorter ones that are not untypical.

- Q. Understood. In your testimony, Ms. Tillotson, you testified that the Schiller Unit 5 biomass unit had an 88 percent capacity factor. But you didn't give capacity factors for the other units. And I wonder if you could tell us what the capacity factors were for Units 1 and 2 at Merrimack?
- A. (Tillotson) I can. We responded to a capacity factor, I'm looking for it, in our data requests.

MR. FOSSUM: Well, and before you do that, I remind you that the Commissioners have not seen any of those data requests. So, just whatever your testimony is today is what your

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1 testimony is today.
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- 2 WITNESS TILLOTSON: Okay. I'm
- 3 looking for it, and maybe that's why I was
- 4 speaking out loud.

BY THE WITNESS:

5

- A. (Tillotson) I'm sorry, I have it labeled, but it's on the wrong page, Mr. Kreis.
- 8 A. (White) Generally, while we're tracking it down -- here you go.
- 10 A. (Tillotson) Oh, thank you. So, we did provide

 11 that in a data request. The capacity factors

 12 in 2014, Merrimack 1 was mid-30s, 36 percent;

 13 Merrimack 2 was just under 30, at 28.3 percent.
- I'll keep going. Newington, as we know, is
- often in the single digits, it was 3.6 percent.
- Schiller 4 and 6 are usually very similar, and
- they were in the low 20s.

18 BY MR. KREIS:

- 19 Q. And would that be -- that's also reflected in
- 20 the graphs that are at the very end of Exhibit
- 21 1, that are, at least in -- look to be Bates
- 22 | Pages 109 through 112?
- 23 A. (Tillotson) Yes.
- 24 Q. Super. Thank you. I think I just have a few

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questions for Mr. White, and then I'll be done. Mr. White, at your testimony, Page 6 of your testimony, I'm not sure what Bates Page number that is, but I can find out. You testified that "Eversource participated in Forward --Financial Transmission Right auctions as a method of hedging the congestion price differential between the major fossil stations and the New Hampshire load zone for periods and in quantities according to the forecasted unit operation." And this is, I quess, a question that will display perhaps my cosmic ignorance of how Financial Transmission Rights work. But, given that the generation units and the load are in the same load zone, why is it necessary to engage in any of those transactions? (White) They are both in the same zone, but the

A. (White) They are both in the same zone, but the pricing locations are different. There is a price for the zone which load pays, but the price that generation is paid is a nodal price, it's specific to their pricing node. So, there are, in fact, pricing — locational price differences between generation nodes and the

1 load zone.

- Q. Thank you. And you testified that "Financial Transmission Rights resulted in an overall decrease in Energy Service expense of \$965,348." And my question is, how do we know that that was a prudent how do we know that that was prudent, with respect to the Financial Transmission Right transactions your company engaged in?
- A. (White) Well, again, it's addressed in a manner that we typically have, over years of discourse on Financial Transmission Rights, this is the context in which we report it. To fully delve into it would require, you know, a more in-depth discussion. In the past, those discussions have revolved around the quantities that we bid for FTRs, how it matches up with our generation operations, the prices at which we bid to acquire FTRs, in relation to historical cost differences between the generation nodes and the load zones, and whether those costs are prudent and in line with reasonable judgment as to what was an appropriate price to pay. And, if you were to

have paid more, perhaps you would have overpaid. And, so, you instead take the risk in the market of what congestion may turn out to be. So, it's a balance between cost and risk.

I can tell you that our approach has really not changed over the last several years. In fact, this result is — it's something of a — it's an indication of the way congestion related between those price points in this particular year. The fact of the matter is that that \$965,000 is looking at the FTR in isolation. If you were to combine it with the costs to load, it really indicates that costs to load were elevated, and the two sort of offset one another, because what we've really done is locked in a fixed price for the congestion component of the LMP.

So, that's kind of a lengthy way to say that it would involve a deeper dive, I guess, to really round all that together. We provide this, like I say, as an indication, as we have in the past, of the relative size of our FTR involvement and the relative costs involved in

this particular year. So, it can be viewed in relation to other years that we've experienced.

I will tell you that that number has been a positive number in some years, a negative number in other years.

- Q. So, is it your testimony that, in a year when it's positive, we should just let well enough alone and assume that the Company did a good job of participating in the Financial Transmission Rights market?
- A. (White) Well, what I can tell you is that we certainly feel we acted prudently. We've taken -- we have not changed our strategy in the FTR market. I guess that's anyone's judgment as to whether a positive or negative number. Certainly, it reads better when it's a positive number. But I guess what I'm telling is that that's more an indication of the price risk involved with regard to congestion during that particular year.

Most of that number in 2014 was driven by events in February alone, between Merrimack and the load zone, related to transmission outages.

Other than that single event, which is probably

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95 percent of that value, the remainder of the
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         year was very benign, and the settlement, with
 3
         regard to FTRs, was relatively small dollars,
         certainly, in relation to that nearly a million
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         dollars in one month. So, it's more an
 6
         indication of how volatile and the price delta
 7
         between our generation nodes and the load zone,
         how it happened to work out in a given year.
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         Super. Thank you. I would love to do that
    Q.
10
         deep dive sometime. But, obviously, we don't
11
         necessarily have the time to do that here. So,
12
         thank you.
13
         (White) Okay.
    Α.
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                   MR. KREIS: Mr. Commissioner, I think
         that's all the questions I have.
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                   CMSR. SCOTT: Thank you, Mr. Kreis.
17
         Ms. Amidon.
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                   MS. AMIDON: Thank you. Good
19
         afternoon.
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                   WITNESS GOULDING: Good afternoon.
    BY MS. AMIDON:
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Q. Mr. Goulding, I wanted to direct your attention to Bates stamp 004, and it's the question that begins on Line 20. Please let me know when

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{DE 15-132} {05-25-16}

1 you're there.

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- 2 A. (Goulding) Okay. I'm there.
- Q. All right. And the second sentence there says the net adjusted under-recovery of

 122.3 million was "due primarily to deferred

 Scrubber costs of 105 million". And you did not include the 105 million in the calculation of the stranded cost reconciliation in this docket, did you?
- 10 A. (Goulding) No. It has been excluded.
- Q. Right. And you know what the status is now of the deferral?
- 13 A. (Goulding) Deferral is currently being
 14 recovered in rates. Effective January 1st, the
 15 Temporary Scrubber Rate was changed from 0.98
 16 cents to 1.72 cents, which included one-seventh
 17 of the deferral, Scrubber deferral recovery.
 - Q. Okay. So, this is an element of this filing that the Commission won't be seeing in the future filings, is that fair to say, a referral to the -- a referral to the Scrubber deferral?
 - A. (Goulding) I think it would still be carved out as a Scrubber deferral, because we still, as part of our Energy Service rate filing, we do

identify the Scrubber deferral separately and the Scrubber costs separately.

- Q. Okay. Thank you for correcting me. I didn't think of that. Ms. Tillotson, as I understand it, the testimony that you provided said that "the generation units were available to run when called", is that correct?
- A. (Tillotson) That's certainly our goal. And the exception would be on Page -- Bates Page 054, I would point to the three units at the top of the list that say "Tube Leak", which are consistent, sort of the typical historical outages, and Schiller 5's forced outage, as Mr. Kreis said, you know, the original termed "forced outages". But, for those times, when called upon, we were available to run. Our availability was very high in 2014.
- Q. Thank you. And, in light of the pending divestiture proceeding before the Commission, could you just briefly describe, and I know that's maybe not relevant to this particular calendar year 2014, but can you just enlighten us briefly on the Company's approach to managing its generation units?

A. (Tillotson) Sure. I'll start with 2014. 2014, like 2013, reflected what I would have said, lower capital expense years and lower O&M years that would reflect the fact that we had lower operation. And, certainly, some of our maintenance costs get tied back to operations. With lower operations, you're also allowed to postpone some work. There's some cyclic work that will always occur, but the cycle associated might be extended. So, if one would look at 2013 and 2014, they would see what I would say lower expenses for both O&M and capital.

To your question, coming into 2015, we did recognize that some of those cycles were due anyway. You know, you have your car maintenance that you do because of miles, but you have some that you just do routinely. So, in 2015, we had some routine turbine work/boiler work that we would do. We also had some of that work that we were postponing on purpose, we went ahead, and there's an element of efficiency associated with sort of collecting all that work. So, in 2015, it was

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becoming appropriate to have that uptick in budgets. One, because it was time, we had lower costs in years 2012, '13, and '14, and it certainly was consistent with us recognizing that, if you were going to have people looking at the plants, having things in reliable, good working order seemed to make sense not to have a list of things that would be done coming up.

So, 2015 is a year where we did selectively and very purposely complete work, probably still not as high as some of the historical years, but that would be expected because of overall lower operation. But strategic, well-planned expenses and capital that really target reliability. Because if you were to ask us, as operators, our job is really now very focused on high reliability. Because, when you're not necessarily the base load unit that runs all the time, it's of utmost importance to be ready to run when you're needed. So, we have maintenance people who really focused on that, and their philosophy is "what can I do today to make sure that, when this unit is asked to run, it runs well and

efficiently?"

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- Thank you. I know that wasn't part of this Q. filing, but I appreciate your response. Mr. White, we can't leave you out of this discussion. I wanted to ask you if you recall, from prior dockets, some of the recommendations that the Company agreed, in terms of how you purchase power on the market? In other words, there was a point in time when you made long-term commitments, and there was a recommendation that the Company agreed to to make more short-term or spot market purchases. And could you tell me if you adhered to those recommendations in Calendar Year 2014? Α. (White) Yes. As a result of going back several years, and as longer term purchases were
 - years, and as longer term purchases were expiring, we entered into a number of discussions with Staff and Staff's consultants, and discussed purchasing strategies. At that time, we developed a guideline that we continue to maintain and update as necessary.

But, yes. We still maintain that approach, follow -- refer to those guidelines and follow them. You know, it occurred at a

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1
         time when market prices were falling, and other
 2
         than in the winter, when our generation is
 3
         running, with regard to purchases in other
         months, we still enter in typically to shorter
 4
 5
         duration and in a more near-term fashion than
 6
         would have been done several years ago. We're
 7
         maintaining that strategy today.
                    MS. AMIDON:
 8
                                 Thank you.
                    WITNESS WHITE:
9
                                    Yes.
10
                   MS. AMIDON: I have no further
11
         questions.
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                    CMSR. SCOTT: Commissioner Bailey.
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                    CMSR. BAILEY: Thank you. Good
14
         afternoon.
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    BY CMSR. BAILEY:
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    Q.
         Mr. Goulding, on Bates Page 006 of your
17
         testimony, at the bottom, on Line 25, you say
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         "the net balance", there's an "under-recover of
19
         $9.6 million" for the stranded cost recovery,
20
         correct?
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    Α.
         (Goulding) Yes.
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         Is that the total amount that you're asking to
         recover in rates going forward?
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(Goulding) That number has since been updated.

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Α.

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        There was a settlement reached in DE 14-120,
        and it was a resolution of the RRB dollars that
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3
        were outstanding. There was about 5.7 million,
4
        plus interest. Where there was an agreement
5
        where 50 percent was returned to customers and
6
        50 percent was retained by shareholders. So,
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        the number would have been more in the range of
        $6.3 million.
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- Q. Because you've already recovered half of the 5.7 million or whatever it was?
- 11 A. (Goulding) Actually, sorry. It would have
 12 been --
- Q. I mean, look at the next sentence in that paragraph, you did --
 - A. (Goulding) Yes. That's correct. The \$9.7 -- 6 million [\$9.6 million] would have not have represented that we gave 50 percent back to customers.
- Q. So, you're asking in this filing to recover an additional \$9.6 million for stranded costs?
- A. (Goulding) It's 9.6, minus the portion that we would give back to customers. So, 9.6, minus the 3.2.
- 24 Q. Okay.

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[WITNESS PANEL: Tillotson~White~Goulding]

- 1 A. (Goulding) So, \$6.4 million.
- 2 Q. Okay. So, I'm trying to just summarize what
- you're asking for. So, 6.4 million to be
- 4 recovered in stranded costs -- in the SCRC
- 5 charge on customers' bills, right?
- 6 A. (Goulding) Yes.
- 7 Q. And what does that equate to on a per
- 8 kilowatt-hour, for residential?
- 9 A. (Goulding) It's roughly 0.08 cents per kWh.
- 10 Q. So, that will be 0.0008 in dollars?
- 11 A. (Goulding) Yes. 0.0008.
- 12 Q. Three zeros?
- 13 A. (Goulding) Yes.
- 14 Q. Okay. And, right now, the stranded cost
- 15 recovery charge I believe is a credit or did
- that change when the RRB settlement was
- 17 reached?
- 18 A. (Goulding) The current -- the rate that's in
- effect right now, the January 1st rate, which
- is a credit, actually reflects the \$3.2 million
- 21 being shared back with customers and it
- reflects the under-recovery that's in this
- filing.
- 24 Q. Oh. The January 1st rates are already

- 1 collecting this, collecting?
- 2 Α. (Goulding) They're in there subject to 3 reconciliation.
- So, the 0.008 [0.0008?] or the 0.08 cents per 4 Q. 5 kilowatt-hour is already being recovered in 6 rates?

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- 7 (Goulding) Yes, due to the timing of it. Α. 8 Because, normally, what happens is, we'd have 9 our January 1st rates like, say, for 10 January 1st, 2016, it would have 2015 activity 11 in it, and then we do our reconciliation filing 12 in May that would have the actual numbers. So, 13 if there's any kind of adjustment for 14 reconciling an item, we'd go back and reconcile
- 16 Q. So, is there an adjustment that we need to 17 approve right now?

the over-/under-recovery.

- 18 Α. (Goulding) What's -- no, there's no adjustment. 19 What's being requested to be approved is that 20 the costs and the revenues that are in here, 21 and, well, particularly the costs, are deemed 22 to be prudent and reasonable.
 - Because those are the costs and revenues that Q. are being collected in rates right now?

[WITNESS PANEL: Tillotson~White~Goulding]

- 1 A. (Goulding) Yes.
- 2 Q. Oh. Good to know.
- A. (Goulding) Sorry. If I can just add, this is -- yes, because this is a reconciliation
- 5 filing, versus a rate-setting filing.
- Q. Okay. I mean, my understanding of reconciliation is that you are reconciling rates, and the rates are going to change as the result of the reconciliation?
- A. (Goulding) If there was anything that was
 disallowed or deemed imprudent or a new cost
 added on, then we would reconcile those into
 the current rates that are in effect next time
 we have a rate change.
- Q. Okay. So, do the rates always change on January 1st?
- 17 A. (Goulding) The SCRC rate and Energy Service 18 rate always change on January 1st.
- 19 Q. Okay.
- 20 A. (Goulding) And then again on July 1st.
- Q. So, are we going to get another filing that we need to approve for July 1st? This isn't the
- July 1st filing?
- 24 A. (Goulding) This is not. We made a filing May

9th to change the Energy Service and SCRC rates
for July 1st. And we'll update that filing
sometime in June, and then I believe there's a
hearing June 25th for the Energy Service and
SCRC rates effective July 1st.

- Q. Okay. All right. So, just to make sure I understood what you were saying in your testimony, on Pages 4 and 5, which are Bates Pages 004 and 005, if I net everything out that you're asking to recover as a result of this filing, which has been in effect since January 1st, right? Is it \$17.3 million?
- A. (Goulding) So, I'm assuming you're adding the Energy Service deferral and the SCRC deferral together, is that --
- Q. I didn't include the Scrubber deferral. So, if you look at the top of Page 5, you say the net adjusted under-recovery was 18 and a half million lower -- sorry. If you take the 122.3 million on the bottom of Page 4, and you subtract out the Scrubber deferral of 105, you get 17.3.
- A. (Goulding) Right. So, that difference, the 17.3, is already included in our rates, our

[WITNESS PANEL: Tillotson~White~Goulding]

- Energy Service rate that's in effect now, and it will be in the updated rate.
- Q. Right. But that's what you're asking us to approve?
- 5 A. (Goulding) Yes.
- 6 Q. Okay.

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- 7 A. (Goulding) But that's for the Energy Service
 8 portion. There's also the SCRC portion we just
 9 discussed.
- 10 Q. Yes. Yes, I understand that. Okay.

11 Okay. So, Mr. White, the same kind of 12 questions, because I guess I'm cosmically 13 unaware of these things. So, your testimony is 14 summarizing the amount of energy that you had 15 to purchase, because your generation didn't 16 make enough during some times, and excess 17 energy that it sold. And, where does that --18 so, there was a net expense to you in 19 generation, I think, of about \$20 million, 20 rounded? Not sure?

A. (White) Well, you're correct, in that my
testimony is to sort of illustrate how load was
served during 2014. And it's essentially a
make or buy decision. When our generation is

running, we're burning fuel expense and providing megawatt-hours that serve load essentially. When it's not economic to run our generation, we purchase from the market. We also have must-take purchases from IPPs and via power purchase agreements.

And, essentially, in 2014, we made and bought from the market about the same amount. Most of the generation ran in the winter, the cold weather months, and in the remainder of the year is when we did the bulk of the purchasing. And, then, there's about probably less than half the amount that those two types of resources provided were provided through purchase agreements and must-take purchases from small independent producers.

- Q. And the over-market cost of that is what is getting recovered in the Stranded Cost Recovery Charge?
- 20 A. (White) Correct.
- 21 Q. From the power producers?
- 22 A. (White) That's correct.
- 23 Q. Okay.

24 A. (White) There's a portion of those that are on

fixed rates that are currently above market,

and that above-market portion flows through

SCRC.

- Q. Okay. So, to the extent that you purchased more than you sold, what happens to that difference?
- A. (White) Well, it's a balancing function, I guess. But I think you have to recognize that those two activities are really occurring at different times. We can look at annual volumes and look at the relative size and the relative cost of those things. The fact is that most of the sales we made were in the winter months, when our generation was running, and our total portfolio of supply resources exceeded load.

 So, we were surplus to load, and we were making sales into the market in high-priced months, which provides a fair amount of value to ES customers. So, that's --
 - Q. I'm just trying to figure out how that translates into rates. I understand what you're saying. I just --
- A. (White) Well, that subsidizes the rate, effectively.

1 Q. Okay.

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- 2 A. (White) It lowers the rate.
- Q. So, in those, in the winter months, when you sell it, because you can sell it for a really great price, it lowers the Energy Service -- overall Energy Service rate. And, when you have to buy it, in the warmer weather months, because it's not efficient for you to operate
- 10 A. (White) Correct.
- 11 Q. -- you have to pay for that?

your plant, --

- 12 A. (White) Right.
- Q. So, if you take the difference between those two, you had to pay a little bit more than you sold?
- 16 A. (White) Okay.
- Q. But that's not how -- you don't make that calculation?
- 19 A. (White) Well, we do. But I'm not sure what
 20 that indicates. It's a fact --
- 21 Q. It doesn't --
- A. (White) -- that that's how it works out. It's
 as much dependent on the relative price between
 the two periods and the relative volumes. I

mean, I think that particular net number could work out almost any way and to any degree. It isn't necessarily an objective function. We're not trying to drive that number to one thing or another. We're trying to operate in the most economic fashion day-to-day, week-to-week, and month-to-month.

Q. And I appreciate that.

- A. (White) And that's what drives whether we're buying or selling.
- Q. I get that. So, when you have to sell -- I mean, when you have to buy \$20 million of power, and you put it in this filing, is that what you're asking to have recovered?
- A. (White) Yes. Yes. Essentially, all the costs expensed to serve load, whether it be fuel costs or power purchase costs, we've presented that and said "We believe we have provided service to default customers in a prudent fashion. Here's how we did it. We made this much, we bought this much." And it's really all of those costs that are being subjected for prudence review.
- 24 Q. And that's in the Energy Service rate?

- (White) And all those costs flow through the 1 Α. 2 Energy Service rate. 3 CMSR. BAILEY: Okay. Thank you. WITNESS WHITE: Yes. 4 5 CMSR. SCOTT: I have a few questions 6 I want to -- I'll do the usual caveat, 7 whoever feels best to answer, certainly feel free. 8 BY CMSR. SCOTT: 9 10 I want to focus a little bit on the past Q. 11 engineering consultant reports and kind of 12 tease out in my mind why it's okay to not do 13 one this time. 14 So, maybe one of you can help me out. 15 the past, have there been any significant 16
 - disallowances recommended by the Staff consultant?
 - Α. (Tillotson) I would say that there have been very small disallowances that are identified, but they are usually a very small dollar value.

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- Can you give me an order of magnitude? Are we Q. talking millions? Thousands? Hundreds? Tens?
- (Goulding) In 2000 -- I'm trying to get my Α. years straight, 2012, I think it was around

1 \$32,000 of replacement power costs, if I
2 remember correctly.

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- A. (Tillotson) And I want to say that was one of the higher years.
- A. (Goulding) Yes. Last year, there was no recommendation, but I believe the value was somewhere below \$2,000, if I remember correctly.
- (Tillotson) We've had years where it's been a Α. few thousand. I almost want to say one year there was an \$8.73, because someone offered a \$10 bill. They are modest. And, I would tell you that we spend a lot of time making sure all the lists of outages are understood, and that's just an effort that's valuable. But, certainly, you can go through those lists pretty quickly for a lot of reasons. There won't necessarily be replacement power costs if there's no water at a hydro, but we'll still spend time talking about it. So, there is value to talking about it, and we certainly have, and there's probably been a lot of exchange over the years that's been helpful.

But, when you look at these lists, and

then turn it into your question of, I'll turn it around a little bit, "what's the potential for lost dollars in this year that might have been identified?" That item of lost replacement power costs had dollar values associated with boiler leaks that had a very short outage. So, I think those would have sort of satisfied the typical operation. And, then, you had other outages with no replacement power costs.

So, this would have been a year with very little opportunity to have a disallowance of significant dollars, just because it wasn't even on the list to possibly end up with a discussion.

- Q. Thank you. And, along similar lines, can you characterize this period that we're talking about, as far as how much the units ran compared to other periods?
- A. (Tillotson) I can. When we were running in what I call the "more typical higher market prices", we would end up operating with capacity factors anywhere from 70, 75, 80, depending on how much forced outage time,

depending on how much planned outage time.

In 2014, I'll use Merrimack as an example, we operated about 50 percent of the time. So, to the extent that we were in the market, because we should be, and having lower cost energy that way, then there's no risk to the discussion — there's no opportunity to talk about why your plant was broken or didn't run. And we actually weren't on line about 60 percent of the time. So, it's a step change. We had no reserve outages, no reserve shutdown in 2009.

So, you can see, in a very short period of time, we went to having some reserve time that was in that kind of 20 percent range. And, then, all of a sudden, I think it's what we recognized and talked about with Staff, that 2012 was a weird weather year. But then '13 and '14 were both very similar, and it did behoove us to not run and be in the market, which meant we weren't on line having forced outages, which really becomes the focus of that engineering review. So, the list ended up being short and pretty easy to talk about with

- 1 the conversations we had in the tech session.
- Q. Thank you. And you've kind of gone there a little bit. What about the converse? My understanding is the units aren't necessarily as agile as far as ramp-up time as others in the regional fleet.
- 7 A. (Tillotson) Correct.
- 8 Q. Is that correct?

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- 9 A. (Tillotson) It is correct.
- 10 So, are there times where we should be looking Q. 11 at where you, and I'm just throwing out a 12 hypothetical, you know probably, at seven in 13 the morning, there's going to be a higher 14 demand. So, because of your ramp-up time, 15 you've got to run in what amounts to 16 out-of-merit, so you're up and running in time for the peak. I assume that happens, that's a 17 18 normal operating scenario?
 - A. (Tillotson) To the extent that 2013 and 2014 ended up looking very similar, both by numbers and just as we talked about it, some of that discussion came up in 2013. It did acknowledge the fact that the big Merrimack coal units had some of the lesser flexibility. And, so, when

we would talk to wholesale marketing, we wouldn't look at just short windows of time, we would broaden the look. "So, would you come on line and provide value through, say, a week, and then choose to stay on in a weekend, even if you were close or even just slightly above?" Because what that would position you for is being on line on that Monday that you thought would go back up in price.

So, we sort of test the range of scenarios, recognizing that each of the units and locations has slightly different flexibility. The coal units, with the cyclones, are less flexible. So, they focus on coming on and being effective at the higher price times. We've done work at Newington to make it more flexible. And we recognize that, so that's going to build into the conversation.

The engineer consultant, in 2013, actually participated in some of the calls that we have. We have weekly calls. So, you're identifying the constraints that the units have. We recognize it's a part of the discussion. So that truly our goal is to have them available

- with the most value, and sometimes that has a little bit of, you know, a shorter operation or a larger operation, so that, when you look at the broadest picture, you end up with the highest value.
- Q. So, going back to not having an engineering consultant this time. So, I see your logic in that, the units ran less, so there's less outages to pick apart to see whether they're prudent, for want of a better word. And what I think I'm hearing you say is, what I was asking as the converse, is are there times you ran where you really weren't in merit, and maybe that should have been questioned? And you're -- that sounds like you're saying "by and large, no"?
- A. (Tillotson) I would point you to the lack of operation that says -- it certainly makes sense that our operation in 2013 and '14 look similar. So, we didn't end up running when you say maybe we shouldn't have. Because of the similarities and the commonness of those numbers, you certainly wouldn't look at that and say "I think we may have run too much."

I think we've -- as the time has changed, and the world has become a little clearer, we had a couple of years where you really were not as sure of where the market was going to go and what would happen. We had some winter months that were very high.

So, I would certainly say you could go through an awful lot of discussion, but I don't see that exposure, just because we really didn't run in places where I went "Wow, I'm surprised we ran." And it just doesn't end up --

- A. (White) Yes. To the extent those circumstances existed, I think they were fairly similar to circumstances, for example, as Ms. Tillotson points out, in 2013. So, those types of scenarios were reviewed by the consultant. We experienced similar events throughout '14. But nothing unusual that hadn't been looked at more closely in the prior year, for example.
- Q. Okay.

A. (White) Now, we do have to run to perform environmental testing at times. We run, as pointed out, through a lower price period,

- because we fully expect a high price period
 right around the corner. It's those similar
 types of scenarios, as we've experienced the
 last few years, nothing out of the ordinary
 with regard to that in 2014.
 - Q. Okay. And would I be fair to characterize, again, the fact that you ran less period, would indicate there's less opportunity for that also, is that correct?
- 10 A. (Tillotson) Correct.

- Q. All right. Thank you. And, Mr. White, you had a discussion regarding FTR with Mr. Kreis. Am I correct in my assumption that, if you got to a point where you didn't have generation, that the FTR would make less sense, that that hedging wouldn't be as necessary, is that true?
 - A. (White) Yes. I would say that was true, except to the extent if it drove to more purchases.

 Purchases in New England are typically made at the Mass. hub, which is in itself also a different pricing location than the New Hampshire load zone. So, it may just move to a different pricing location. But, certainly, that portion of FTRs that we probably tend to

focus on that associated with the generation,
there would be no need for that.

CMSR. SCOTT: Please.

REDIRECT EXAMINATION

BY MR. FOSSUM:

- Q. So, Mr. Goulding, I have some questions for you in hopes of -- hopes of making it clear what we're looking for here. You were asked -- Commissioner Bailey asked you some questions about some of the numbers that are in the filing and what we're looking for here. Do you recall that line of questioning?
- A. (Goulding) I do.
- Q. And I'm hoping you could work with me coming through a -- sort of a -- not really a hypothetical, but an explanation of how we got to what this filing is. So, going back, since this is a 2014 filing, going back to the end of 2013, how would the Company have set its, let's just use Energy Service, how would the Company have set its Energy Service rate for effect in

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2014?

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- A. (Goulding) So, the January 1st, 2014 rate would have been set based on ten months of actual information for '13 and -- or, yes, for 2013, and two months of forecasted information. And, then, we would have updated our July 1st rate for a full year of actual information for 2013.
- Q. So, it would have been based on the cost information that you had at the time, as well as some forecast information?
- 11 A. (Goulding) That's correct.
- Q. And that would go into the rate, and the
 Company would begin collecting that rate on
 January 1st, correct?
- 15 A. (Goulding) Yes.
- Q. Would the amount of money collected over
 that -- in that, say, that first six months,
 would that match the amount of money the
 Company expected to collect in having set the
 rate in late 2013?
 - A. (Goulding) No. There's always reconciliations related to sales variances. We forecast out what our sales are going to be, and then the actual sales come in. So, in terms of

[WITNESS PANEL: Tillotson~White~Goulding]

- revenues, they would be different from what we forecasted, unless we're perfect, which I would never say we are.
- Q. And, so, we would make an adjustment in the middle of the year?
- 6 A. (Goulding) That's correct.
- 7 Q. And, then, at the end of year, what would occur?
- 9 A. (Goulding) At the end of the year, we would do
 10 the same thing. We would use the actual
 11 information available, and reconcile any
 12 actuals to forecasted revenues and expenses
 13 into the new rate that we set for the current
 14 year.
- Q. So, in this example we're walking through, so that would be the rate that would then take effect on January 1st, 2015?
- 18 A. (Goulding) That's correct.
- 19 Q. So, that -- those costs, the actuals, the
 20 forecasts that you spoke to, they would be in
 21 the rates effective January 1, 2015, if I
 22 follow, is that correct?
- A. (Goulding) January 1, 2016, sorry. Right?

 Because you're looking at the 2014 actuals?

- 1 Q. No, no. Not yet.
- 2 A. (Goulding) Okay.
- 3 Q. We just finish 2000 -- we're finishing 2014.
- And, so, the actual information, and as well as
- 5 the forecast information, in 2014 would be in
- 6 rates beginning January 1, 2015, correct?
- 7 A. (Goulding) Yes.
- 8 Q. And, so, when the Company makes this filing,
- 9 the one that we're talking about today, in May
- of 2015, what is in that filing?
- 11 A. (Goulding) This is the actual costs for the
- 12 12-month period of 2014, actual costs and
- revenues.
- 14 Q. So, now that the books are all closed for 2014,
- and all of the actual costs have come in,
- that's what's contained in this filing for the
- 17 financial information?
- 18 A. (Goulding) That's correct.
- 19 Q. But, to the extent that there is a mismatch, an
- 20 over- or under-recovery, that was already in
- 21 the rates beginning at the start of that year,
- is that correct?
- 23 A. (Goulding) Well, if there was a mismatch of the
- 24 actual information to forecast for 2014, it

- would have been incorporated into the July 1st,
 2 2015 rate.
- Q. And, so, by this filing, we're not looking to add or remove any costs from the rates?
- 5 A. (Goulding) No, we're not.

- Q. But, if there was a finding or an agreement, however it comes about, that some costs that we now have identified having occurred in 2014 was improperly incurred, how would that be handled in the rates?
- A. (Goulding) The next time we adjusted our rates,

 which for -- after the order was out, we would

 reflect that finding or disallowance or

 whatever in those new rates. So, we would

 adjust our over/under or expenses by that

 dollar amount.
 - Q. So, hypothetically, if the Commission were to review this filing, and conclude in an order issued next week that there was some imprudent cost that was occurred -- that was incurred in 2014, how would that appear in customers' rates?
 - A. (Goulding) For the rates that we file in June for effect July 1st, we would incorporate that

- 1 adjustment into those rates.
- Q. But, absent such a finding, what is it that the Company is requesting in this filing?
 - A. (Goulding) Approval of the costs and revenues that are in this filing as being prudent and reasonable.
- 7 Q. I hope that clarified. And, Ms. Tillotson, I
 8 have just one other question. Commissioner
 9 Scott asked you a question about historical
 10 disallowances, do you remember that --
- 11 A. (Tillotson) I do.

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- 12 Q. -- that line of questions? Beyond the dollars,

 13 beyond the disallowance, were there any other

 14 actions or requirements that came out of the

 15 engineering reviews historically?
 - A. (Tillotson) Yes. I looked back, and that review focused on the capacity and energy transactions. It looked at our outages for the year. And it also looked at recommendations that were collected as part of the Staff/consultant review.
 - Q. And, so, even if there were no dollars
 recommended for disallowance necessarily, there
 were still recommendations for improvement in

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         operations that the Company undertook, is
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         that --
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    Α.
         (Tillotson) That's true. And, for a period of
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         time, it was a very robust effort. There were
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         items on that that were multi-year items.
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         What's interesting is that, with 2013, I
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         believe all of those items, that it sort of had
         some path along over prior years, came to
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         closure, with one exception. There was a
         request, one recommendation that still had
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         activity on it. So, all of the recommendations
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         were closed, with the exception of we were
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         going to monitor some tree-trimming, on both
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         the transmission and distribution side. It was
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         a three-year window that we were going to
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         provide that information. And we provided it
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         in 2014, we provided it in 2015's filing, and I
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         believe we'll have one more year.
              So, from a logistic standpoint, it was a
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         year that had very little activity associated
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         with some activity that had been more eventful
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         in prior years.
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                                Thank you. That's all I
                   MR. FOSSUM:
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had.

1	CMSR. SCOTT: Thank you. And the
2	witness panel is excused, but it will probably
3	just be easier if you just stay there.
4	I'll start with, are there any other
5	procedural well, first, I'll ask, excuse me,
6	is there any objections to striking the ID on
7	the exhibit?
8	MS. AMIDON: No.
9	(Atty. Kreis indicating in the
10	negative.)
11	CMSR. SCOTT: Mr. Fossum?
12	MR. FOSSUM: No.
13	CMSR. SCOTT: Mr. Kreis?
14	MR. KREIS: None.
15	CMSR. SCOTT: Okay. Are there any
16	other procedural issues before we go to
17	closing?
18	MS. AMIDON: I believe not.
19	CMSR. SCOTT: Then, Mr. Kreis.
20	MR. KREIS: I'm sorry that Chairman
21	Honigberg isn't here to hear me say that I have
22	no florid closing, complete with lots of
23	adjectives and adverbs.
24	My Office is a signatory to the

1 Settlement Agreement that calls for the divestiture of Public Service Company's 2 3 generation portfolio. And we continue to believe that that's in the public interest. 4 5 And that resolves or would resolve 6 substantially all of the issues we have about 7 PSNH and its generation portfolio. 8 And, subject to that, we concur with 9 the proposal to reconcile the 2014 Energy 10 Service and Stranded Cost Recovery Charges as 11 proposed by the Company. 12 CMSR. SCOTT: Thank you. We'll relay 13 that to Chairman Honigberg. 14 Ms. Amidon. 15 MS. AMIDON: Thank you. Staff has 16 reviewed the filing, and we believe that 17 Eversource appropriately calculated the 18 reconciliation of Energy Service and Stranded 19

MS. AMIDON: Thank you. Staff has reviewed the filing, and we believe that Eversource appropriately calculated the reconciliation of Energy Service and Stranded Cost Charges consistent with prior dockets and prior orders of the Commission. And have concluded that the Company exercised reasonable and prudent management of the assets and purchases in 2014, and that the result is the actual costs of providing service to Default

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Service is in the rates.

And, therefore, we recommend that the Commission approve the filing.

CMSR. SCOTT: Thank you. Mr. Fossum.

MR. FOSSUM: Thank you. The Company believes that the Staff ultimately reasonably concluded that it would not need the type of engineering review that it had done historically, in light of the activities in 2014. And, as you've heard, it was, I suppose, a "normal" year would be one way to describe it. There was no -- nothing that was remarkable or outstanding about the generation operations that year.

The filing is, of course, different in terms of the costs and revenues that are shown, but consistent with how the Company has done these reviews, with the input of the Staff, the OCA, and others over the years. We believe that the filing demonstrates the Company's actual, prudent, and reasonable costs — the reconciliation of the actual, prudent, and reasonable costs for providing Energy Service and relative to Stranded Cost

1	Recovery in 2014, and we request that the
2	Commission accept the filing and approve the
3	reconciliation. Thank you.
4	CMSR. SCOTT: Thank you very much.
5	We'll take the matter under advisement. Seeing
6	no other business, we will stand adjourned.
7	Thank you.
8	(Whereupon the hearing ended at
9	3:29 p.m.)
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