

**THE STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

REQUEST FOR WAIVER OF PUC 305.03

Docket No. DE 17-XXX

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “Company”) hereby requests, pursuant to New Hampshire Code of Administrative Rules Puc 201.05, that the Commission waive certain requirements of Puc 305.03, relative to the testing schedules for watt-hour meters and demand devices. In support of this filing, Eversource says the following:

1. Puc 305.03 sets out certain scheduling requirements for the testing of watt-hour meters and demand devices. Under Puc 305.03(c)(1)b.1. Eversource is required, on an annual basis, to select a sample test group of meters for testing and to repair, recalibrate or retire the meters it tests as may be necessary. In addition, pursuant to Puc 305.03(c)(1)b.2. and Puc 305.03(d), Eversource is to select additional meters, beyond those in the sample test group, for testing, and is to repair, recalibrate or retire those meters as may be necessary.

2. As the Commission is aware, Eversource has recently transitioned its previous fleet of electromechanical meters to new digital Automated Meter Reading (“AMR”) meters. As part of that process, around 540,000 customer meters were replaced with new meters. In conjunction with that effort in 2013 Eversource sought, and was granted, a waiver of the meter testing requirements specified above. *See generally* Docket No. DE 13-215. The basis for the waiver was that because the AMR meters are new meters, upon installation they would have recently gone through a calibration and testing process by the manufacturer, and they were sample tested

by Eversource or its contractors at the time of their installation. The regular testing of meters was to resume in October of the year following completion of the AMR meter installations. On that schedule, regular testing would recommence in October 2017. Rather than begin in October 2017, however, Eversource requests that the waiver be extended for one year, until October 2018, for the reasons set out below.

3. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

4. As noted, the AMR meters installed by Eversource are digital, “solid state,” meters which are less inclined to the kinds of errors found in electromechanical meters (e.g., friction, wear of mechanical components, magnetic circuit problems, etc.), and the meters were subject to calibration and testing at the time of installation. Additionally, some industry standards and practices relating to sample testing have changed in the intervening years. In recognizing the differences in the design and function of the AMR meters, as well as the changes in industry standards, and considering Eversource’s field experience to date, Eversource is in the process of designing and implementing a meter testing program that is better suited to the design of solid state AMR meters. That program design will not be complete in time to begin testing in October and, therefore, Eversource requests that the Commission continue the existing waiver.

5. In that this request for a waiver does not pertain to any matters currently pending before the Commission, Eversource avers that granting the waiver will not disrupt the orderly

and efficient resolution of matters before the Commission. As to the public interest, in Eversource's assessment compliance with the rule would be onerous or inapplicable in these circumstances, and the purpose of the rule is satisfied by another method. The purpose of the testing schedule required by Puc 305.03 is to ensure that the Company will inspect and test its installed meters on a regular basis to confirm that they are working properly, and to repair or remove from service those meters not working properly. In that the AMR meters have been recently tested as part of their deployment, and in that these meters are less prone to the kinds of errors found in electromechanical meters, the need for regular testing is low and abiding by the testing schedule for those meters would be an inefficient use of resources at this time. Moreover, in that Eversource is designing a new testing program, recommencing the old testing program at this time would likewise be inefficient.

WHEREFORE, Eversource respectfully requests that the Commission grant a waiver of Puc 305.03 as described above, and order such further relief as may be just and equitable.

Respectfully submitted,

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

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