

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

DOCKET NO. 18-XXX

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

Technical Statement of  
Rhonda J. Bisson

April 23, 2018

A. Purpose of Technical Statement

This technical statement is being provided in accordance with the requirements of New Hampshire Code of Administrative Rules, Chapter Puc 1605.02. The statement will describe revised tariff language that Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) seeks to implement to alter the manner of applying the discounts available through the Energy Assistance Program (“EAP”) to outdoor private area lighting of residential customers.

B. Background

In 2017, the EAP Advisory Board began reviewing the manner in which the EAP discounts are applied to customers’ accounts. In particular, the EAP Advisory Board reviewed the application of the EAP discount to those customers who have outdoor private area lighting at their residences. Relative to the issue of outdoor lighting, Eversource’s tariff, which has been substantially unchanged since 2002, provides, relevant part:

Customers will be billed for Delivery Service under Residential Delivery Service Rate R or Residential Time-of-Day Delivery Service Rate R-OTOD and, if applicable, for Default Energy Service, except that a Percent Discount will be applied to all applicable Delivery Service and Default Energy Service rate charges including the Customer Charge and any Meter Charge, the Distribution Charge, the Transmission Charge, the Stranded Cost Recovery Charge, the System Benefits Charge and any charges under Default Energy Service for the first 750 kwh of monthly usage per service account. The Percent Discount will not be applied to the Electricity Consumption Tax, Line Extension Surcharges, Returned Check Charges or Service Charges. The Percent Discount cannot be applied to or combined with the Elderly Customer Discount. **The covered provisions of this rate shall also include service under Load Controlled Delivery Service Rate LCS and Outdoor Lighting Delivery Service Rate OL.**

Eversource Tariff, NHPUC No. 9 at Original Page 48 (emphasis added). In accordance with Eversource's approved tariff, Eversource has been applying the EAP discount to customers who have outdoor private area lighting billed under Outdoor Delivery Service Rate OL. As that rate is applied, a customer has one account metered for his or her residential usage, and a second unmetered account for his or her private area lights. Those accounts are aggregated for billing purposes and the EAP discount is then applied to the aggregated bill. For outdoor lights wired behind a customer's residential meter, any usage of those lights is counted as part of the customer's residential usage and is not billed under Rate OL.

Presently, Eversource has 148 customers receiving an EAP discount on their private area lighting under Rate OL amounting to approximately \$12,300 in discounts annually. Based upon the information available to Eversource, neither Liberty Utilities nor Unitil apply the EAP discount to outdoor lights, while the New Hampshire Electric Cooperative does. NHEC presently has approximately 100 customers receiving a discount on their private area lights.

During discussions of the EAP Advisory Board, members indicated an interest in having all utilities apply the discount on a uniform basis. More specifically, the members stated their interest in ceasing the practice of applying the EAP discount to private area lighting. Consistent with that interest, the EAP Advisory Board's Utility Procedures Manual has been amended to remove private area lighting from receiving the discount. The amended version of the relevant portion of that manual is included with this filing, as Attachment A, to demonstrate the adjustment. Consistent with this same decision, for Eversource to apply the change to the application of the EAP discount, it is necessary for Eversource to amend its tariff. By this submission, Eversource requests that the Commission approve its amended tariff provisions as contained in the attached tariff pages. This change will apply only to those customers who have been receiving the discount for private area lights billed on Rate OL.

#### C. Impact of the Tariff Revision on Eversource Revenues

Eversource anticipates little or no impact on its revenue as a result of the change. To the extent a customer receives a discount on the service used, the value of the discount is reimbursed to the utility through the EAP. Accordingly, applying the EAP discount differently should have essentially no impact on Eversource's revenue. It is possible that if a discount is no longer available for a customer's private area lights, the customer will request the light be removed and there will be a decrease in revenue. Eversource anticipates that any such decrease in revenue will be minimal in light of the few customers currently receiving the discount. Although Rate OL includes a contract term for not less than one year, Eversource will not invoke this provision for any customers who request the light be removed.

#### D. Customer Notification

While Eversource anticipates no material economic impact, Eversource appreciates that customers currently receiving the discount will be impacted by this change. Accordingly, Eversource is prepared to notify each of the customers to explain the change and how those customers will be affected. Eversource has included with this submission, as Attachment B, a draft letter Eversource proposes to send to the affected customers upon a Commission decision in this matter.

E. Revised Tariff Pages

Eversource has enclosed a revised tariff page, in both clean and “black-lined” versions, incorporating the proposed revision to its tariff eliminating the EAP discount to private area lighting. Eversource requests that the Commission allow the tariff page to become effective on August 1, 2018, as proposed, and respectfully requests the Commission to issue an Order by July 1, 2018 to allow the Company to provide sufficient notice to the affected customers in advance of the August 1, 2018 effective date.