

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DOCKET NO. DE 21-117
REQUEST FOR ADJUSTMENT OF
STRANDED COST RECOVERY CHARGE

DIRECT TESTIMONY OF

Erica L. Menard

Stranded Cost Recovery Charge

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

January 10, 2022

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STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
PREPARED TESTIMONY OF ERICA L. MENARD
STRANDED COST RECOVERY CHARGE RATE
UPDATED RATES EFFECTIVE FEBRUARY 1, 2022
Docket No. DE 21-117

1 **I. INTRODUCTION**

2 **Q. Please state your name, business address and position.**

3 A. My name is Erica L. Menard. My business address is 780 North Commercial Street,
4 Manchester, NH. I am employed by Eversource Energy Service Company as the Manager
5 of New Hampshire Revenue Requirements and in that position, I provide service to Public
6 Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the
7 “Company”).

8 **Q. Have you previously testified before the Public Utilities Commission?**

9 A. Yes, I have testified before the Public Utilities Commission (“Commission”) on many prior
10 occasions.

11 **Q. What are your current responsibilities?**

12 A. I am currently responsible for the coordination and implementation of revenue
13 requirements calculations for Eversource, as well as the filings associated with
14 Eversource’s Energy Service (“ES”) rate, Stranded Cost Recovery Charge (“SCRC”),

1 Transmission Cost Adjustment Mechanism (“TCAM”), Regulatory Reconciliation
2 Adjustment (“RRA”), and Distribution Rates.

3 **Q. What is the purpose of your testimony?**

4 A. The purpose of this testimony is to: (1) provide an overview of this filing; and (2) seek the
5 necessary approvals to set the updated average SCRC rates, including updates to the (i)
6 Regional Greenhouse Gas Initiative (“RGGI”) refund, (ii) Ch. 340 excess Burgess
7 BioPower power purchase agreement¹ (“PPA”) payments, (iii) Environmental
8 Remediation costs, and (iv) Net Metering adders, that will take effect February 1, 2022.

9 **Q. Has the SCRC rate been calculated consistent with the August 1, 2021 SCRC rates**
10 **that were approved by Order No. 26,502 in Docket No. DE 21-117?**

11 A. Yes, the updated February 1, 2022 SCRC rates have been prepared consistent with the last
12 approved SCRC rates.

13 **II. OVERVIEW**

14 **Q. Please describe the components of the SCRC and their application to this rate request.**

15 A. The SCRC recovers certain costs under the authorities contained in RSA Chapters 374-F
16 and 369-B. The PSNH Restructuring Settlement, approved in Order No. 23,549, defined
17 PSNH’s stranded costs and categorized them into three different parts (i.e., Parts 1, 2 and
18 3). Part 1 costs were composed of the Rate Reduction Bonds (“RRB”) Charge, which was
19 calculated to recover the principal, net interest, and fees related to the original RRBs. These
20 original RRBs were fully recovered as of May 1, 2013. As part of Eversource’s divestiture

¹ PPA contract with Burgess BioPower, LLC approved in Docket No. DE 10-195, Order No. 25,213 (April 18, 2011) and Order No. 26,198 (December 5, 2018). The PPA terminates on November 30, 2033.

1 of its generating facilities under the settlement in Docket No. DE 14-238, new RRBs were
2 issued in May 2018 and are included as Part 1 costs in the SCRC rate. The final RRB
3 principal and interest payments will be made in February 2033. Part 2 costs are “ongoing”
4 stranded costs consisting primarily of the over-market value of energy purchased from
5 independent power producers (“IPPs”) and the amortization of payments previously made
6 for IPP buy-downs and buy-outs as approved by the Commission. Also, as part of the
7 divestiture of Eversource’s generating facilities, Part 2 incorporates various new costs,
8 including: the costs of retained power entitlements, unsecuritized prudently incurred
9 decommissioning (if any), environmental, or other residual costs or liabilities related to the
10 generating facilities. Part 3 costs, which were primarily the amortization of non-securitized
11 stranded costs, were fully recovered as of June 2006.

12 Additionally, as noted above, the SCRC rate proposed to be billed to customers beginning
13 February 1, 2022 includes recovery of the following adders: (i) the RGGI refund as
14 required by RSA 125-O:23, II and Order No. 25,664 (May 9, 2014), directing Eversource
15 to rebate excess RGGI auction proceeds it receives through the SCRC rate; (ii) Ch. 340
16 excess Burgess PPA payments per the Docket No. DE 19-142 Settlement Agreement and
17 Order No. 26,331 (February 18, 2020); (iii) amortization of Environmental Remediation
18 costs per the Docket No. DE 19-057 Settlement Agreement Section 7.1 and Order No.
19 26,433 (December 15, 2020), and; (iv) Net Metering Costs per the Docket No. DE 20-136
20 Settlement Agreement and Order No. 26,450 (January 29, 2021).

Q. Is Eversource currently proposing a specific SCRC rate and separate adders as noted above at this time?

A. Yes, it is. Attachment ELM-1 and Attachment ELM-2 provide rate class specific updated rate calculations for the SCRC proposed for February 1, 2022. The updated February 1, 2022 average SCRC rates (Part 1 and Part 2 only, excludes the Ch. 340, RGGI refund, Environmental Remediation and Net Metering adder amounts) provided in this filing are shown in the table below.

Rate Class	Current Rate (cents/kWh)	Updated Rate (cents/kWh)	Change (cents/kWh)
R	0.656	0.689	0.033
G	0.757	0.676	(0.081)
GV	0.588	0.555	(0.033)
LG	0.210	0.212	0.002
OL/EOL	0.319	0.913	0.594

The SCRC rate adders for Ch. 340, RGGI Refund, Environmental Remediation and Net Metering are provided in Attachment ELM-3 and ELM-4 (RGGI Refund), ELM-5 and ELM-6 (Ch. 340), ELM-7 and ELM-8 (Environmental Remediation) and ELM-9 and ELM-10 (Net Metering). The updated February 1, 2022 SCRC rate adders provided in this filing are shown in the table below.

Rate Adder	Current Rate (cents/kWh)	Proposed Rate (cents/kWh)	Change (cents/kWh)
Ch. 340	0.247	(0.062)	(0.309)
RGGI Refund	(0.279)	(0.335)	(0.056)
Environmental Remediation	0.037	0.044	0.007
Net Metering	0.228	0.117	(0.111)
Total Adders	0.233	(0.236)	(0.469)

The total February 1, 2022 SCRC by rate class provided in this filing are included below.

Rate Class	Current Rate (cents/kWh) ²	Updated Rate (cents/kWh)	Change (cents/kWh)
R	0.889	0.453	(0.436)
G	0.990	0.440	(0.550)
GV	0.821	0.319	(0.502)
LG	0.443	(0.024)	(0.467)
OL/EOL	0.552	0.677	0.125

Q. Historically, there was a single average SCRC rate that was applied to all customers. Why are there now class specific average SCRC rates?

A. As part of the Settlement Agreement approved in Docket No. DE 14-238 at Line 252 of Section III.A, the SCRC revenue requirement is to be allocated to each rate class as follows: 5.75% to Rate LG, 20.00% to Rate GV, 25.00% to Rate G, 48.75% to Rate R, and 0.50% to Rate OL. Applying this differing allocation by rate class means that there can no longer be a single average SCRC rate for all customers. Page 1 of Attachment ELM-1 provides the rate class specific average SCRC rates including and excluding the RGGI, Ch. 340, Environmental Remediation and Net Metering adders.

Q. What are the major reasons for the decrease in the SCRC rate from the rates currently in effect?

A. The decrease in the updated SCRC rates proposed for effect on February 1, 2022 as compared to the current rates is due primarily to: (i) the absence of \$12.0 million in recoverable costs related to Part 2 Generation Costs not Securitized, which were recovered over a one-year period ending January 2022 per the terms of the Settlement Agreement

² Rates approved in Order No. 26,502 (July 29, 2021).

1 filed in the Generation Divestiture docket, Docket No. DE 20-005; (ii) an increase in prior
2 period over recoveries resulting in a refund to customers of \$6.7 million; offset by (iii) an
3 increase in Part 1 Costs of \$5.1 million, and (iv) an increase in Part 2 Above Market IPP
4 and PPA costs of \$1.1 million. The table below provides additional detail identifying the
5 variance from the underlying cost in the rates that were approved for August 1, 2021 and
6 this updated February 1, 2022 rate filing.

Description	(\$000s)		
	Approved August 1, 2021 Rates per Order No. 26,502	Updated February 1, 2022 Rates	Inc/(Dec)
Part 1 Costs	56,737	61,796	5,058
Part 2 Costs:			
Above Market Non-Wood IPPs	(286)	(224)	62
Above Market Cost of Burgess	20,766	22,669	1,903
Above Market Cost of Lempster	1,123	221	(902)
Total Above Market IPP & PPA Costs	21,604	22,666	1,062
Energy Service REC Revenues Transfer	(12,821)	(13,844)	(1,023)
REC Sales Proceeds/RPS True-up	(2,610)	(2,538)	72
ISO-NE/Other O&M	106	25	(81)
Residual Generation O&M	(6,048)	(7,382)	(1,334)
NEIL Credit (Seabrook Costs/Credits)	(179)	(633)	(454)
EDIT	(5,885)	(5,885)	-
Generation Divestiture Costs not Securitized	12,007	-	(12,007)
Return	(653)	(415)	238
Total Part 2 SCRC Costs	5,521	(8,006)	(13,527)
1/31/21 SCRC Part 1 and 2 (Over)/Under Recovery	(2,372)	(9,061)	(6,688)
Total Part 1 and 2 Costs plus 1/31/22 (Over)/Under Recovery	59,886	44,729	(15,157)
SCRC Part 1 and 2 Revenues	(74,164)	(44,729)	29,434
Total Decrease in SCRC Part 1 and 2 Costs	(14,278)	0	14,278

1 **Q. Please describe the detailed support for the calculation of the average SCRC rates**
2 **provided in Attachments ELM-1 and ELM-2.**

3 A. Attachment ELM-1, page 1 provides the calculation of the average SCRC rates for the five
4 rate classes incorporating the cost allocation (excluding Part 1) for each rate class as
5 defined in the settlement agreement approved in Docket No. DE 14-238. Page 2 provides
6 a summary of the February 2022 to January 2023 forecast period's estimated cost
7 information related to the Part 1 and Part 2 costs. Page 3 provides the estimated rate class
8 specific RRB charges that were calculated using the current RRB rates established for the
9 August 1, 2021 SCRC rate filing in Docket No. DE 21-117 as well as the most recent RRB
10 rates established for the current period as filed in Docket No. DE 17-096 and provided in
11 Attachment ELM-13. Page 4 has been provided to reconcile the amount of funds that are
12 collected through the RRB charge by its inclusion in the SCRC with the amount of funds
13 that are in the collection and excess funds trust accounts. It is important to note that
14 customers are not directly paying the principal, interest and fees associated with the RRBs
15 in the SCRC rate calculation. Instead, customers are paying an RRB charge as part of the
16 overall SCRC rate that results in remittances to the RRB trust that are used to satisfy the
17 principal, interest and fees of the RRBs. The RRB charge is calculated to satisfy the
18 principal, interest and fees of the RRBs using the forecasted sales. Page 5 provides detailed
19 cost information by month related to the Part 2 ongoing costs, and summary information
20 for the Burgess and Lempster contracts as well as cost and actual revenues associated with
21 the purchases of Renewable Energy Certificates ("REC") from these contracts and the
22 transfer of Class I REC revenues between the ES rate and the SCRC rate to account for the

1 Class I RECs necessary to satisfy the Class I Renewable Portfolio Standard (“RPS”)
2 requirement for ES. Page 6 provides additional details related to the Burgess and Lempster
3 contracts as well as the cost associated with the RECs purchased under these contracts and
4 the transfer of revenues between the SCRC and the ES rates. Page 7 provides the details
5 regarding the return calculation. Attachment ELM-2, pages 1 through 7 provide the
6 projected detailed cost, revenue and carrying charge components relating to the SCRC
7 reconciliation for the 12 months ending January 31, 2022.

8 **III. PART 1 COMPONENT**

9 **Q. How are the February 1, 2022 SCRC Part 1 Costs calculated?**

10 A. The Part 1 SCRC actual costs are shown in Attachment ELM-2, Page 3 and forecasted
11 costs are shown in Attachment ELM-1, Page 3. In the months that have been estimated for
12 this filing, the forecasted Part 1 SCRC costs are calculated using the RRB rates established
13 in the latest Routine True-up Letter dated January 5, 2022 in Docket No. DE 17-096 and
14 provided in Attachment ELM-13 multiplied by the forecasted sales for each rate class.
15 Since there is a one-month lag in the RRB remittance process, the forecasted sales are also
16 reported on a one-month lag on Attachment ELM-1, Page 3. These estimates represent a
17 reasonable estimate of the expected RRB charge remittances.

18 **Q. Are the RRB rates filed in the January 5, 2022 RRB true-up letter reflected in the**
19 **updated February 1, 2022 SCRC rate filing?**

20 A. Yes. The annual routine true-up letter was filed on January 5, 2022, as shown in
21 Attachment ELM-13. The Part 1 costs have been updated to reflect the updated RRB rates
22 and applied to the kWh sales forecast used throughout the SCRC rate by class to calculate

1 the revenue required to apply to the Part 1 costs. Variances between estimated and actual
2 revenue received from Part 1 costs will be reconciled in the August 1, 2022 SCRC filing.

3 **IV. PART 2 COMPONENT**

4 **Q. Could you please provide additional details for the Part 2 on-going costs included on**
5 **page 5 of Attachments ELM-1 and ELM-2?**

6 **A.** Yes. The costs included in this SCRC filing on page 5 are:

7 1. (Lines 1 through 11): Non-Wood IPPs³: All costs and market revenues associated
8 with the existing IPPs. Prior to divestiture, any benefit of below market energy or
9 capacity associated with the IPPs was included in the ES rate, while the above
10 market portion was included in the SCRC. Consistent with the settlement in Docket
11 No. DE 14-238, all IPP costs and revenues (energy and capacity), whether above
12 or below market, are included in the SCRC.

13 2. (Line 12) Burgess PPA: Effective April 1, 2018, the costs and market revenues
14 associated with the Burgess PPA are included in the SCRC. Line 12 shows the net
15 cost of the Burgess PPA. Additionally, provided in Attachment ELM-1 and ELM-
16 2 (page 6) is support for the underlying actual and forecast assumptions related to
17 the costs and revenues associated with the Burgess PPA by month.

18 3. (Line 13) Lempster PPA Effective April 1, 2018, the costs and market revenues
19 associated with the Lempster PPA are included in the SCRC and shows the net cost
20 of the Lempster PPA. Additionally, provided in Attachments ELM-1 and ELM-2

³ Three longer term IPP contracts expire on 12/31/2021, 12/31/2022 and 12/31/2023. Going forward, upon termination the long term contracts will transition and be treated like all other IPPs, where they will be transacted under a short-term rate order based on short term avoided cost rates.

(page 6) is support for the underlying actual and forecast assumptions related to the costs and revenues associated with the Lempster PPA by month.

4. (Line 14) Energy Service REC Revenues Transfer: This line has been included to capture the transfer of the RECs necessary to satisfy the Class I REC obligation for ES customers. This is consistent with the treatment of Class I RECs described in Section II.H of the November 27, 2017 settlement in Docket No. DE 17-113 where it states: “As to Eversource's RPS obligation relevant to Class I, the Settling Parties agree that it shall be managed in a manner consistent with that described on page 14 of the initial Testimony of Shuckerow, White & Goulding.”

That testimony provides, with reference to the Burgess and Lempster contracts:

The REC amounts purchased from these sources may more than meet energy service obligation quantities, eliminating the need for Class I purchases. Since the 2015 Agreement calls for the costs of those PPAs to be recovered via the SCRC, a transfer price for RECs obtained under those PPAs used to satisfy RPS needs for ES customers must be set. In order to properly account for these Class I REC purchases for both ES and SCRC purposes, Eversource proposes to establish a transfer price equal to the Class I REC prices established via the mechanism described previously.

5. (Line 15): REC Sales Proceeds/RPS True Up: As Class I RECs in excess of those necessary to satisfy the Energy Service Class I REC requirement are sold, the proceeds associated with the sales will be included in actual data, in addition to the annual RPS compliance filings in the month of June and any related RPS true up related to the Class I REC transfer to Energy Service.

- 1 6. (Line 16) ISO-NE/Other Costs: The costs included in this line are miscellaneous
2 ISO resettlement and other costs along with credits that were historically included
3 in the ES rate.
- 4 7. (Line 17) Residual Generation O&M: The ongoing costs and liabilities associated
5 with the divested Generation assets. These include property tax refunds, pension
6 credits, commitments associated with the hydro plants, and legal fees associated
7 with lawsuits related to the Generation assets when they were owned by
8 Eversource.
- 9 8. (Line 18) Nuclear Electric Insurance Limited (“NEIL”) Credits: charges and
10 credits related to Seabrook Power Contracts between Eversource and North
11 Atlantic Energy Company (“NAEC”).
- 12 9. (Line 19) Excess Deferred Income Taxes (“EDIT”): At the beginning of 2018, the
13 Federal and State tax rates changed, which resulted in EDIT. That excess is to be
14 refunded to customers.
- 15 10. (Line 20) Generation Divestiture Costs not Securitized: divestiture costs not
16 securitized that were subject to audit and settlement in Docket No. DE 20-005. Per
17 the settlement agreement, a one-time amount of \$12 million is being recovered over
18 the one-year period February 2021 to January 2022 only.

19 **V. RGGI REFUND COMPONENT**

20 **Q. Please describe the detailed support for the calculation of the RGGI refund rate**
21 **provided in Attachments ELM-3 and ELM-4.**

1 A. In Order No. 25,664 in Docket No. DE 14-048, and pursuant to RSA 125-O:23, II, the
2 Commission ordered that certain proceeds from the quarterly RGGI auctions be refunded
3 to Eversource's customers through the SCRC. Attachment ELM-3, page 1, and
4 Attachment ELM-4, page 1 provide a summary of 2022 and 2021 information related to
5 RGGI auctions and the actual and forecasted amounts allocated to Eversource for refund.

6 **Q. Is Eversource currently proposing a specific RGGI refund rate at this time?**

7 A. Yes, it is. Attachment ELM-3, page 1 provides a proposed RGGI Refund rate calculation.
8 Eversource has included in this updated filing the results of the recent December 1, 2021
9 RGGI Auction No. 54. The February 1, 2022 RGGI rate calculation inclusive of the
10 Eversource share of the RGGI Auction No. 54 proceeds results in a RGGI Refund rate of
11 negative 0.335 cents/kWh and is a higher negative rate of 0.056 cents/kWh than the current
12 August 1, 2021 RGGI Refund rate of negative 0.279 cents/kWh.

13 **VI. CH. 340 ADDER COMPONENT**

14 **Q. Could you please provide additional details for the Ch. 340 Adder costs included on**
15 **Attachments ELM-5 and ELM-6?**

16 A. As described earlier, in Docket No. DE 19-142, a Joint Motion was filed related to the rate
17 recovery of costs associated with the Cumulative Reduction Factor ("CRF") under the PPA
18 with Burgess BioPower. Broadly speaking, under the terms of the PPA, any amounts in
19 the CRF above \$100 million were to be deducted from the amounts paid to Burgess for
20 purchases under the PPA. At the end of operating year 6, the CRF amount was
21 \$106,976,603 or \$6,976,603 above the limit set by the PPA. That amount was further
22 reduced by the Excess MWh adjustment called for in the PPA of \$1,709,925, which was

1 deducted from the amounts paid to Burgess during the first three months of operating year
2 7 (December 2019 through February 2020) and has been fully incorporated and recovered
3 in previous SCRC rates.

4 It was also agreed in Docket No. DE 19-142 that the forecasted over cap costs for Burgess
5 should be recovered in current rates rather than waiting until the end of the operating year
6 and recovering in the following year. The calculation of Burgess over market costs per the
7 PPA is shown in Attachments ELM-1 and ELM-2, Page 6, lines 1 to 7. The Burgess over
8 market energy costs are then recovered in the Ch. 340 Adder rate as shown in Attachments
9 ELM-5 and ELM-6. Since these are forecasted costs and revenues and rely on assumptions
10 of Burgess energy output and market prices as well as forecasted retail MWh sales, the Ch.
11 340 Adder costs are reconciled in this and future SCRC rate filings.

12 Under the terms of the settlement agreement in Docket No. DE 19-142, rather than being
13 deducted from the amounts paid to Burgess, the excess is recovered from customers
14 through the SCRC on an equal cents per kWh basis rather than the specified class
15 percentages. This is shown in the Ch. 340 Adder calculations in Attachment ELM-5. The
16 updated and proposed Ch. 340 Adder rate effective February 1, 2022 is (0.062) cents/kWh
17 as compared to the current Ch. 340 Adder rate of 0.247 cents/kWh. Attachment ELM-5,
18 page 1, provides a summary of the rate calculations and Attachments ELM-5 and ELM-6,
19 page 2, provide the monthly detail for the Burgess energy costs and revenues. The
20 concurrent recovery of the over market Burgess energy costs is removed from Part 2 SCRC
21 cost and transferred for recovery through the Ch. 340 Adder. The over market energy costs

are calculated based on the contract market rates. There is a slight difference between the over market energy costs per the PPA and ISO-NE revenues. The difference remains in the Part 2 SCRC costs. This is shown in Attachments ELM-1 and ELM-2, Page 6.

VII. ENVIRONMENTAL REMEDIATION ADDER COMPONENT

Q. Please describe the detailed support for the calculation of the Environmental Remediation Cost Adder rate provided in Attachments ELM-7 and ELM-8.

A. Per the Commission's Order No. 26,433 issued on December 15, 2020 approving the Settlement Agreement in Docket No. DE 19-057, and in compliance with the intent of Section 7.1 of the Settlement Agreement, the Company has prepared Attachments ELM-7 and ELM-8 to propose recovery of the Environmental Remediation Costs through the SCRC. Section 7.1 of the Settlement Agreement states the following:

Since the time of restructuring, PSNH has been permitted to defer estimated environmental remediation/manufactured gas plant ("MGP") costs primarily relating to former generation sites. The Company shall be allowed to recover the environmental reserve/MGP liability in the Stranded Cost Recovery Charge ("SCRC") rate at equal cents per kWh across customer classes rather than in distribution rates. To address the shift to the SCRC, the Company has removed an annual amortization of \$2.3 million over four years as of December 31, 2018 from its proposed revenue requirement in this case and shall include it in the SCRC filing following approval of this Settlement Agreement. The amounts to be recovered in the SCRC shall be updated to reflect the actual deferred balance as of the time of the SCRC filing and be amortized over a four-year period. Future environmental costs shall be recovered on a current basis through the SCRC.

As noted above, the Company removed an annual amortization amount of approximately \$2.3 million from the base Distribution revenue requirement based on the Docket No. DE 19-057 test year-end 2018 Regulatory Asset balance. Consistent with the Commission's

1 approval of the Settlement Agreement in Order No. 26,433, Attachments ELM-7 and ELM-
2 8, Page 2, Footnote (A) reflect the Environmental Remediation Regulatory Asset balance
3 at January 31, 2021 of approximately \$12.1 million is being recovered over four years, or
4 an annual amortization amount of approximately \$3.0 million. Attachment ELM-7 reflects
5 the proposed average Environmental Remediation Cost Adder rate of 0.044 cents/kWh
6 effective February 1, 2022.

7 **VIII. NET METERING ADDER COMPONENT**

8 **Q. Please describe the detailed support for the calculation of the Net Metering Cost**
9 **Adder rate provided in Attachments ELM-9 and ELM-10.**

10 A. Docket No. DE 20-136 reviewed and determined via a Settlement Agreement that the
11 SCRC is the appropriate recovery mechanism for recovery and rate treatment of net
12 metering and group host costs as shown in Attachments ELM-9 and ELM-10. Recovery
13 through the SCRC was approved by the Commission in Order No. 26,450 (January 29,
14 2021). Attachment ELM-9 reflects the proposed average Net Metering Cost Adder rate of
15 0.117 cents/kWh effective February 1, 2022.

16 **IX. BILL IMPACTS**

17 **Q. Has the Company included rate exhibits and calculations of the customer bill impacts**
18 **for the proposed February 1, 2022 SCRC rate change?**

19 A. Yes, this detail is provided in Attachment ELM-11.

- 20 • Page 1 compares the current SCRC rates effective August 1, 2021 to the updated
21 SCRC rates proposed for effect February 1, 2022 by rate class.

- Page 2 provides the rate adjustment factor and SCRC rates by rate class for the current and updated SCRC rates, including and excluding the RGGI Refund, Environmental Remediation Adder and Net Metering Adder.
- Page 3 provides the calculation of the SCRC rate adjustment factors by rate class for the updated proposed average SCRC rates and RGGI adders.
- Page 4 provides a comparison of residential rates proposed for effect February 1, 2022 to current rates effective August 1, 2021 for a 550 kWh monthly bill, a 600 kWh monthly bill, and a 650 kWh monthly bill.
- Page 5 provides a comparison of residential rates proposed for effect February 1, 2022 to rates effective February 1, 2021 for a 550 kWh monthly bill, a 600 kWh monthly bill, and a 650 kWh monthly bill.
- Page 6 provides the average impact of each change on bills for all rate classes by rate component on a total bill basis, excluding energy service.
- Page 7 provides the average impact of each change on bills for all rate classes by rate component on a total bill basis, including energy service.

The rate impacts provided in Attachment ELM-11 incorporate changes in the SCRC rate proposed in this filing and all rate changes proposed for January or February have been incorporated at this time.

Q. Has the Company provided updated Tariff pages as part of this filing?

A. Yes. Updated tariff pages are provided as shown in Attachment ELM-12.

1 **X. CONCLUSION**

2 **Q. Does Eversource require Commission approval of the SCRC rate billed to customers**
3 **by a specific date?**

4 A. Yes, Eversource requests final approval of the SCRC Parts 1 and 2, Ch. 340, RGGI,
5 Environmental Remediation and Net Metering Cost rates by January 25, 2022, to
6 implement the new rates for service rendered on and after February 1, 2022.

7 **Q. Does this conclude your testimony?**

8 A. Yes, it does.