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**STATE OF NEW HAMPSHIRE**

**PUBLIC UTILITIES COMMISSION**

**February 9, 2023** - 9:05 a.m.  
21 South Fruit Street  
Suite 10  
Concord, NH

**RE: DE 22-072**  
**PUBLIC SERVICE COMPANY OF NEW**  
**HAMPSHIRE d/b/a EVERSOURCE ENERGY:**  
Petition for Approval of a Regulatory  
Asset and Petition for Waiver of Puc  
2203.02(b)(5). *(Prehearing conference)*

**PRESENT:** Chairman Daniel C. Goldner, *Presiding*  
Commissioner Pradip K. Chattopadhyay  
Commissioner Carleton B. Simpson

*Eric Wind, Esq./PUC Legal Advisor*

*Tracey Russo, Clerk*

**APPEARANCES:** **Reptg. Public Service Company of New**  
**Hampshire d/b/a Eversource Energy:**  
*Jessica A. Chiavara, Esq.*

**Reptg. Community Power Coalition of**  
**New Hampshire (CPCNH):**  
*Clifton Below, Chair*

**Reptg. Residential Ratepayers:**  
*Michael J. Crouse, Esq.*  
*Office of Consumer Advocate*

**Reptg. New Hampshire Dept. of Energy:**  
*Mary E. Schwarzer, Esq.*  
*Matthew C. Young, Esq.*  
*(Regulatory Support Division)*

**Court Reporter:** Steven E. Patnaude, LCR No. 52

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**P R O C E E D I N G**

1  
2 CHAIRMAN GOLDNER: Okay. Good morning.  
3 I'm Commissioner Goldner. I'm joined today by  
4 Commissioner Simpson and Commissioner  
5 Chattopadhyay.

6 We're here this morning in Docket DE  
7 22-072, in which the Commission has docketed two  
8 related petitions filed by the Public Service  
9 Company of New Hampshire, doing business as  
10 Eversource Energy. The first of these Petitions  
11 is a "Request for Approval of a Regulatory  
12 Asset", the second of these Petitions is a  
13 "Request for a Waiver of Rule Puc 2203.05(b)(5)".  
14 We will take preliminary positions from the  
15 parties on each of these matters in turn.

16 First, let's take appearances,  
17 beginning with Eversource.

18 MS. CHIAVARA: Good morning,  
19 Commission. Jessica Chiavara, here on behalf of  
20 Public Service Company of New Hampshire, doing  
21 business as Eversource Energy.

22 CHAIRMAN GOLDNER: Thank you. And  
23 let's move to the Department -- no, I'm sorry,  
24 let's move to the OCA.

1 MR. CROUSE: Good morning, Commission.  
2 My name is Michael Crouse. I'm the new Staff  
3 Attorney with Donald Kreis, the Consumer  
4 Advocate.

5 CHAIRMAN GOLDNER: Welcome. And let's  
6 move to CPCNH.

7 MR. BELOW: Good morning,  
8 Commissioners. I am Clifton Below, the Chair of  
9 the Community Power Coalition of New Hampshire.

10 CHAIRMAN GOLDNER: Thank you. And,  
11 finally, the Department of Energy.

12 MS. SCHWARZER: Good morning, Mr.  
13 Chairman. I'm Mary Schwarzer, Staff Attorney  
14 with the Department of Energy. And with me is  
15 co-counsel Matthew Young.

16 CHAIRMAN GOLDNER: Okay. Very good.

17 So, for preliminary matters, at the  
18 outset, CPCNH submitted a timely Petition to  
19 Intervene, which was not objected to. Does  
20 anyone have anything further to say with respect  
21 to this Petition to Intervene?

22 *[No verbal response.]*

23 CHAIRMAN GOLDNER: No. If not, we have  
24 reviewed and determined that CPCNH's intervention

1 would be in the interest of justice, and would  
2 not impair the orderly and prompt conduct of the  
3 proceeding, and therefore grant intervention  
4 pursuant to Puc 203.17 and RSA 541-A:32, II.

5 Are there any other matters that need  
6 to be raised, before we take preliminary  
7 positions?

8 MS. CHIAVARA: Chair Goldner, if I  
9 could say something just on the intervention, and  
10 I'm not opposing the intervention. But just I  
11 was wondering if the Commission --

12 CHAIRMAN GOLDNER: That's good, because  
13 it's too late now.

14 MS. CHIAVARA: Yes. Yes, absolutely.

15 So, all I was going to say was, you  
16 know, the rights, duties, and obligations of  
17 CPCNH, regardless of the outcome of these two  
18 matters, will likely be the same. If the waiver  
19 is granted, we won't have -- be able to provide  
20 the data. If the waiver is not granted, we still  
21 can't provide the data. And the other is a  
22 matter of accounting treatment, which doesn't  
23 directly affect CPCNH.

24 So, I would just say, if the

1 intervention request could be limited to the  
2 issues of the docket, that would be, just to  
3 ensure the prompt and orderly proceeding of the  
4 docket, that would be appreciated.

5 CHAIRMAN GOLDNER: Okay. Would anyone  
6 else like to comment on the intervention, and any  
7 limitations on the intervention?

8 MR. BELOW: Just that I think it's  
9 obvious that it concerns the matters in this  
10 docket.

11 CHAIRMAN GOLDNER: Okay. Thank you,  
12 Mr. Below.

13 Okay. I think we can move along then.  
14 Is there anything else that anyone would like to  
15 raise, before we take preliminary positions?

16 *[No verbal response.]*

17 CHAIRMAN GOLDNER: Okay. Well, let's  
18 take preliminary positions. What we plan to do  
19 is take positions on each of the Petitions in  
20 turn. So, we have two Petitions: A Petition for  
21 a Regulatory Asset and a Petition for a Rule  
22 Waiver.

23 So, on regulatory asset, or assets,  
24 this Petition seeks regulatory accounting

1 treatment for incremental non-recurring costs and  
2 carrying charges directly associated with changes  
3 to the existing billing systems to comply with  
4 RSA 53-E and the Puc 2200 rules.

5 So, let's begin with that Petition.  
6 And, Attorney Chiavara, if you would like to go  
7 first, it's your privilege?

8 MS. CHIAVARA: Sure. And I'll say that  
9 I did prepare remarks addressing both Petitions  
10 at once. I can certainly just try to address the  
11 regulatory asset to begin with.

12 If I can just say at the outset, I  
13 think both of the matters turn more on legal and  
14 regulatory questions, rather than factual ones.  
15 And both are fairly straightforward inquiries  
16 that I think can be resolved easily enough, as  
17 far as Eversource is concerned. The Company is  
18 obviously seeking a waiver from a rule it cannot  
19 comply with and then for accounting treatments  
20 for costs that were mandatorily incurred.

21 The fact that both matters are not in  
22 dispute, to my knowledge. And, so, the  
23 Commission could rule on both Petitions with an  
24 order *nisi* after this prehearing conference.

1           But, to go straight to the regulatory  
2           asset, in regards to that matter, I believe this  
3           is a simple request. The Company is only seeking  
4           permission for a particular type of accounting  
5           treatment for the costs that were incurred to  
6           necessarily implement the newly adopted Puc 2200  
7           rules.

8           Regulatory asset treatment is  
9           essentially the Commission saying "Yes, we  
10          recognize that these are the type of costs that  
11          are reasonable to incur, and therefore of the  
12          kind that should be recoverable by the utility."  
13          But they would still be subject to a full  
14          prudency review as part of the Company's next  
15          rate case, to ensure that the Company went about  
16          incurring the costs in a reasonable way.

17          Here, the type of costs in question are  
18          those that are incurred solely and directly to  
19          implement a legal and regulatory mandate, and do  
20          not arise out of a Company-driven initiative, nor  
21          were they subject to any Company discretion.  
22          This work would not have been done if not for the  
23          2200 rules, because the changes only serve to  
24          provide data in the manner required by those



1 rules.

2 Because there is no option but for the  
3 Company to incur those costs, and the work can  
4 only be used for that specific mandated purpose,  
5 it is both reasonable and appropriate to  
6 categorize them as the type of costs that are  
7 likely recoverable, and that's all the Company is  
8 asking for from the Commission.

9 I would say, also in regards to the  
10 regulatory asset, whether the asset, if granted,  
11 would result in just and reasonable rates is a  
12 future determination for the next Eversource rate  
13 case, as just and reasonable rates hinge on a  
14 finding of prudence, and prudence cannot be  
15 determined now, because no costs are proposed for  
16 recovery at this time.

17 Also, the issue of cross-subsidization,  
18 that is no longer a factor, because the question  
19 is not "whether or not the costs should be  
20 incurred?" The "should" issue was determined  
21 with the adoption of the 2200 rules. And, so, as  
22 a policy and factual matter, that issue is  
23 already settled.

24 The crux of determining a regulatory

1           asset treatment is whether the costs are of the  
2           appropriate kind to be incurred, and that hinges  
3           on why the costs were incurred. And the "why",  
4           as I just discussed, is a direct mandate, making  
5           the regulatory asset the most appropriate  
6           accounting treatment for these costs.

7                       As to the facts of this matter, new  
8           rules were adopted; costs were incurred as a  
9           direct result of those rules. And I don't  
10          believe either of those points are contested.  
11          And, so, given the undisputed nature of the facts  
12          that pertain to the relief requested for this  
13          particular Petition, we believe that it would be  
14          appropriate for the Commission to approve this  
15          Petition via order *nisi*. So, that's,  
16          respectfully, what the Company would request.

17                      CHAIRMAN GOLDNER: Okay. Very good. I  
18          think, in this case, we'd like to hear from the  
19          DOE next, Ms. Schwarzer, if you're prepared?

20                      MS. SCHWARZER: Certainly, Mr.  
21          Chairman.

22                      Mr. Chairman, with regard to the  
23          Regulatory Asset Petition, the Department would  
24          note that there's no testimony, there are no

1 affidavits supporting the Petition. We look  
2 forward to exploring Eversource's position that  
3 the cost of the software modifications that it  
4 argues were necessary to comply with the Puc 2200  
5 requirements ought to be treated as a regulatory  
6 asset.

7 It's the Department's understanding  
8 that, currently, those costs are recorded as a  
9 work-in-progress, and we'll explore whether a  
10 deferred account, as distinct from a regulatory  
11 asset, is sufficient, and details of Eversource's  
12 proposed regulatory treatment. We are also  
13 interested in considering how and whether the  
14 2200 rules treatment for POR expense is as  
15 compatible with what Eversource proposes. That's  
16 our position.

17 With regard to *nisi* disposition, we  
18 have no position at this time. So, we're  
19 certainly open to considering that, but have no  
20 position.

21 CHAIRMAN GOLDNER: Okay. Thank you,  
22 Attorney Schwarzer.

23 Let's move to the OCA.

24 MR. CROUSE: Yes. Thank you.

1           Currently, the OCA does not oppose  
2 either motion. But, specifically, in regards to  
3 the regulatory accounting treatment, the OCA  
4 recognizes that it's compatible with what  
5 Eversource is requesting, pending that it is  
6 still subject to prudent review in the rate base  
7 recovery at the next rate base hearing, the OCA  
8 does not oppose the motion.

9           CHAIRMAN GOLDNER: Okay. Thank you  
10 very much.

11           And, finally, CPCNH.

12           MR. BELOW: Thank you.

13           We also don't object to creation of a  
14 regulatory asset. I mean, it does sound like  
15 some of these costs are properly accounted as  
16 something that gets capitalized and recovered  
17 over time, as opposed to an operating cost.  
18 There might be an issue in the future about some  
19 particular element of that. But it does seem  
20 appropriate that those can be addressed when cost  
21 recovery is sought, and all the related issues  
22 around prudence and such.

23           So, I think it would be possible to get  
24 to an order *nisi*, if parties can all agree that

1           this is fairly straightforward, just recognize  
2           these can be accounted for as a capitalized  
3           regulatory asset.

4                       CHAIRMAN GOLDNER:   Okay.   Thank you  
5           very much.

6                       And, so, let's move to Petition  
7           Number 2, the Petition for a Rule Waiver,  
8           beginning again with Eversource.

9                       MS. CHIAVARA:   Thank you very much.  
10          Also, I think, a very simple matter.

11                      We are seeking a waiver from the  
12          portion of the provision of Puc 2203.02(b)(5),  
13          that requires the utility to provide historical  
14          past due accounts receivable information.  As  
15          stated in the Petition, the reason for the waiver  
16          request is because the information just isn't  
17          available.  The Company's systems do not collect  
18          or track this data.  So, it can't be produced or  
19          provided.

20                      When looking at the standard for  
21          approving a rule waiver under Puc 201.05,  
22          Subsection (b) states that the Commission shall  
23          waive the rule if "compliance with the rule would  
24          be onerous or inapplicable given the

1           circumstances of the affected person." Here,  
2           compliance with the rule is beyond onerous; it's  
3           not possible.

4                        If the Company does not receive a  
5           waiver from this portion of 2203.02(b)(5), it  
6           will be forced into a position of non-compliance  
7           with the 2200 rules, which isn't a tenable  
8           position, and, therefore, the public interest  
9           standard for granting the requested waiver has  
10          been met.

11                      Also, in regards to the facts, I don't  
12          believe anyone is disputing the facts that the  
13          Company doesn't have the data. And that is  
14          really the only relevant fact in regards to  
15          determining whether a waiver is warranted.

16                      And, so, again, it seems to the Company  
17          that an order *nisi* would be appropriate. So, we  
18          would respectfully request that outcome.

19                      CHAIRMAN GOLDNER: Okay. Thank you.  
20          Let's move to the Department of Energy.

21                      MS. SCHWARZER: Mr. Chairman, the  
22          Department would again note that there's no  
23          testimony or affidavit accompanying the Petition  
24          at this time.

1           We certainly believe that, with regard  
2           to the waivers addressing software changes to be  
3           made as of December 31st, 2022, that those are  
4           likely moot, provided that there's agreement that  
5           the changes were made and the information at  
6           issue is readily available as planned.

7           With regard to the historic bad debt  
8           information, we're interested in exploring what  
9           the value of the missing information is to  
10          provide, and whether the missing information is  
11          mission-critical.

12          There's been an assertion that, once  
13          the POR plans are in effect, the missing  
14          information would be irrelevant. And we're  
15          certainly interested in hearing a bit more about  
16          that as well.

17          We note that neither Liberty or UES  
18          have sought waivers with regard to meeting the  
19          Puc 2200 rule requirements.

20          And we do look forward to working with  
21          the parties in reaching a prompt resolution, if  
22          possible, through *nisi*, but have no position on a  
23          *nisi* order at this time.

24                 CHAIRMAN GOLDNER: Okay. Thank you

1 very much. And the Office of the Consumer  
2 Advocate?

3 MR. CROUSE: The OCA does not have a  
4 strong position on this matter. And, therefore,  
5 we're not opposing it.

6 Thank you.

7 CHAIRMAN GOLDNER: Thank you very much.  
8 And, finally, CPCNH?

9 MR. BELOW: Thank you. We also don't  
10 oppose this motion.

11 It would have been useful. I think, in  
12 point of fact, none of the utilities have been  
13 able to comply with this. Though, the others  
14 have not sought waivers, well, maybe the Co-op  
15 has.

16 But, quite honestly, the filing of the  
17 POR proposals helps answer some of the questions,  
18 which indicates that there's a very low ultimate  
19 bad debt experience in New Hampshire, which is  
20 what that was trying to get at, to understand  
21 what that exposure was, in terms of planning.

22 CHAIRMAN GOLDNER: Okay. Thank you,  
23 Mr. Below.

24 So, lastly, on the topic of procedural



1 schedules, a preliminary question is whether the  
2 parties think it is appropriate for both  
3 Petitions to proceed on the same procedural  
4 schedule?

5 I know that's a little tricky with this  
6 *nisi/no nisi* question. But I'll throw it out  
7 there for discussion.

8 MS. CHIAVARA: Okay. Yes, I would say,  
9 in regards to a procedural schedule, I realize  
10 the Department has mentioned that "there's been  
11 no testimony or affidavits filed with the  
12 Petition." I do believe that all of the relevant  
13 facts are in the Petition. So, I don't know that  
14 testimony would really give any further  
15 elucidation into any of the relevant issues. I  
16 believe the Petition contains everything that's  
17 needed in order to reach a determination on the  
18 relief that's requested.

19 I believe -- I don't see any problem in  
20 providing an affidavit swearing to the facts that  
21 are in the Petition. That should be fine.

22 CHAIRMAN GOLDNER: Okay.

23 MS. CHIAVARA: As far as a procedural  
24 schedule, we've made staff available to meet with

1 the parties immediately after the conclusion of  
2 this proceeding. But my hope is that would be  
3 the procedural schedule. And then, hopefully, we  
4 could either file a recommendation with the  
5 Petition -- or, with the Commission after that  
6 technical session. And, hopefully, we could  
7 resolve this after that.

8 CHAIRMAN GOLDNER: Okay. Very good.  
9 Attorney Schwarzer, any comments?

10 MS. SCHWARZER: Thank you, Mr.  
11 Chairman.

12 I think the Department would just note  
13 that an attorney can never serve as a witness.  
14 And, while the Petition may contain facts of  
15 interest and facts that are relevant, there's no  
16 ability for an attorney to ever offer testimony.

17 With regard to the combination of  
18 Petitions, I think we're happy to work with  
19 whatever seems most convenient to the Commission.  
20 Certainly, a procedural schedule could allow for  
21 some sort of status conference or opportunity to  
22 decide if part can go forward *nisi* and part --  
23 or, both go forward *nisi*, or if there's further  
24 adjudicatory efforts needed.

1           We are just interested in refining the  
2           distinctions between the regulatory accounting  
3           treatment in more detail, and look forward to  
4           doing that.

5           CHAIRMAN GOLDNER: Thank you. Does the  
6           Consumer Advocate have any comments?

7           MR. CROUSE: At this time, there are no  
8           comments. Thank you.

9           CHAIRMAN GOLDNER: And CPCNH, Mr.  
10          Below, any comments?

11          MR. BELOW: No. I did just want to  
12          call out one thing in the Petition. We don't  
13          feel strongly whether needs to be an affidavit.  
14          But, in Paragraph 2 of the Petition for  
15          authorization of a regulatory asset, it does cite  
16          part of RSA 53-E:7, under Paragraph 2, that ends  
17          in the phrase "except incidental costs, which may  
18          include costs necessary to comply with the  
19          provisions of this chapter up to the time that  
20          the aggregation starts to produce revenue from  
21          participating customers."

22          I think, in the context, that phrase  
23          actually simply refers to "incidental costs  
24          incurred by a municipality or a county" that's

1 starting up a program, you know, otherwise, sort  
2 of the rest of the sentence doesn't make -- quite  
3 make sense.

4 But I'm not -- that's not really  
5 material one way or the other. I just don't  
6 think it's, you know, properly interpreted here.  
7 But it doesn't really affect the outcome.

8 CHAIRMAN GOLDNER: Thank you.

9 So, is it fair to assume that the  
10 parties here, including Mr. Below, having been  
11 granted intervenor status, will meet after this  
12 session, to sort through the question of *nisi*/not  
13 *nisi*, and procedural schedule, and affidavits and  
14 so forth? And then, you would send the  
15 Commission something after this meeting with a  
16 recommendation on how to proceed? Is that --

17 MS. CHIAVARA: That works for  
18 Eversource.

19 CHAIRMAN GOLDNER: Okay.

20 MS. SCHWARZER: That's our expectation.  
21 Although, I don't believe today we'll resolve the  
22 issue of *nisi* or not *nisi*, but we'll certainly  
23 create a procedural schedule to attempt to  
24 address that.

1 CHAIRMAN GOLDNER: Okay. Very good.

2 Any other comments on the path forward  
3 or anything we've discussed today?

4 *[No verbal response.]*

5 CHAIRMAN GOLDNER: No? Okay. Well,  
6 that leaves more time for your post-prehearing  
7 conference discussion.

8 And I thank everyone for their time  
9 today.

10 CMSR. SIMPSON: Could I ask a couple of  
11 questions?

12 CHAIRMAN GOLDNER: Commissioner  
13 Simpson, of course.

14 CMSR. SIMPSON: Thank you.

15 With respect to these systems that are  
16 mentioned, "C2" and "LPB", they're both fairly  
17 aged at this point. Does the Company have a  
18 strategy for replacement of those systems, as  
19 opposed to upgrade?

20 MS. CHIAVARA: It is -- we do have a  
21 strategy. It is not immediate. But it is -- it  
22 is in the works. It's just it's likely to be a  
23 number of years.

24 And the last estimate I heard, and I

1 would not testify to this, and as Attorney  
2 Schwarzer pointed out, I can't testify to it, it  
3 would be about five to seven years.

4 CMSR. SIMPSON: Okay. And do you have  
5 any sense of what that cost might be?

6 MS. CHIAVARA: I have no --

7 CMSR. SIMPSON: Order of magnitude?

8 MS. CHIAVARA: I don't.

9 CMSR. SIMPSON: Okay. Yes, I'd be  
10 interested in better understanding the systems  
11 that provide data to these two billing systems,  
12 and then the core functionality within them.  
13 Just weighing whether it's a better use of  
14 customer resources to upgrade or work towards a  
15 enterprise transition?

16 MS. CHIAVARA: Yes. In relation to  
17 that, it is going to be considerably more than  
18 the costs incurred to comply with the 2200 rules.

19 CMSR. SIMPSON: Uh-huh.

20 MS. CHIAVARA: It will be a  
21 comprehensive system overhaul.

22 CMSR. SIMPSON: I'm sure.

23 MS. CHIAVARA: So, I imagine, by order  
24 of magnitude, it will be much larger.

1 CMSR. SIMPSON: Uh-huh. Okay. I guess  
2 that's all I have. Thanks.

3 CHAIRMAN GOLDNER: Commissioner  
4 Chattopadhyay, anything to add?

5 CMSR. CHATTOPADHYAY: Yes. Good  
6 morning.

7 So, again, going back to the overhaul  
8 of the billing system.

9 MS. CHIAVARA: Yes.

10 CMSR. CHATTOPADHYAY: Is Eversource  
11 pursuing anything in the other states?

12 MS. CHIAVARA: It's a three-state  
13 strategy. We're deploying it one state at a  
14 time.

15 CMSR. CHATTOPADHYAY: Where will it be  
16 first deployed?

17 MS. CHIAVARA: Testing my knowledge, I  
18 believe Massachusetts.

19 CMSR. CHATTOPADHYAY: Okay.

20 MS. CHIAVARA: Yes.

21 CMSR. CHATTOPADHYAY: And how long  
22 would that take?

23 MS. CHIAVARA: The actual deployment?  
24 I believe it takes a bit over a year. But,

1           again, this is not something that I could  
2           absolutely confirm. It would require for me  
3           confirming with somebody who knows a lot more  
4           about this.

5                        CMSR. CHATTOPADHYAY: Do you have any  
6           opinion on, like, why is it going to take five to  
7           ten years for New Hampshire?

8                        MS. CHIAVARA: The five to seven years?

9                        CMSR. CHATTOPADHYAY: Five to seven  
10          years, sorry.

11                       MS. CHIAVARA: Because we are rolling  
12          out the systems sequentially, and it does take, I  
13          believe, at least a year and a half to two years  
14          to roll it out for each system. So, by the time  
15          it gets to New Hampshire, they're just  
16          projecting, you know, IT projects of that  
17          magnitude to take quite a while. And, so, the  
18          rollout, from start to finish, would likely be  
19          about five to seven years from now.

20                       CMSR. CHATTOPADHYAY: And I know that  
21          in your -- the Regulatory Asset Petition, you  
22          have a number there, it's \$1.9 million. You  
23          know, if you have to spend that, and then you go  
24          to the new system, --



1 MS. CHIAVARA: Uh-huh.

2 CMSR. CHATTOPADHYAY: -- is that money,  
3 basically, no longer useful, because you're  
4 moving to something else?

5 MS. CHIAVARA: Agreed. Yes.

6 CMSR. CHATTOPADHYAY: Is that true?

7 MS. CHIAVARA: Correct.

8 CMSR. CHATTOPADHYAY: Okay. I know  
9 that you also mentioned that that is just an  
10 estimate at this point.

11 MS. CHIAVARA: It is.

12 CMSR. CHATTOPADHYAY: But do you have a  
13 revised estimate at this point?

14 MS. CHIAVARA: I don't have a revised  
15 estimate. I did see some early numbers, and they  
16 are likely to be much lower than \$1.9 million.  
17 At least the work that's been done so far is  
18 coming in much lower than that. So, good news.

19 CMSR. CHATTOPADHYAY: So, is that --  
20 that estimate, then, is not very firm. I mean,  
21 what was that, like the \$1.9 million, it was not  
22 done as a reasonably firm estimate?

23 MS. CHIAVARA: It was not a reasonably  
24 firm estimate. It was the best estimate that we

1 had prior to beginning the work. The work,  
2 because of the age of the systems, it's hard  
3 to -- it's a little bit difficult to hedge what  
4 kind -- what effort is going to be required until  
5 you get in there and start doing it.

6 CMSR. CHATTOPADHYAY: Thank you. Just  
7 a very quick question for CPCNH.

8 I think you -- I'm going to tie this  
9 with -- tie this to what the DOE also sort of  
10 mentioned, the historic bad debt. So, you don't  
11 think it's a mission-critical, you know, item?

12 MR. BELOW: Not at this point. And,  
13 mainly because of the information provided in the  
14 POR proposals.

15 CMSR. CHATTOPADHYAY: Okay. Thank you.

16 MS. CHIAVARA: If I may, Commissioner?

17 CMSR. CHATTOPADHYAY: Yes.

18 MS. CHIAVARA: I just wanted to speak  
19 to that, because that came up with the DOE as  
20 well.

21 And, again, even if it were  
22 mission-critical, and this is not -- I'm not,  
23 like, diminishing the impact of that, but, even  
24 if it were mission-critical, we still don't have

1 the data. We can't produce it.

2 So, I don't know, I mean, that would be  
3 regrettable. But the value of the data,  
4 unfortunately, has no bearing on whether we need  
5 the waiver.

6 CMSR. CHATTOPADHYAY: You may not have  
7 any, because you're going there, any idea about  
8 how is it that the other utilities have not  
9 requested a waiver, and, you know, Eversource  
10 does? Do you have any sense why?

11 MS. CHIAVARA: Could be an issue of  
12 timing. Eversource has, I believe, 13 active  
13 aggregations in its service territory right now.  
14 Unitil has one. I'm not sure if Liberty has any.

15 So, I know Liberty's work is still  
16 ongoing. Ours -- I believe our work is  
17 complete -- we are able to provide all data at  
18 this point. All data that we're able to provide  
19 we can provide at this point. And, so, we're  
20 seeking a waiver because we know that this is  
21 something we cannot provide definitively at this  
22 point.

23 As far as Unitil and Liberty, I'm  
24 unsure if they can provide the same data. I

1 don't know if their systems track it. I do know  
2 that their systems are significantly younger than  
3 ours. Unitil's is about five years old.  
4 Liberty's just got launched a few months ago, I  
5 think. So, they may be able to. I don't know if  
6 they can. It may just be that they haven't  
7 gotten to the rule waiver yet.

8 CMSR. CHATTOPADHYAY: Okay. Thank you.  
9 That's all I have, Chair Goldner.

10 CHAIRMAN GOLDNER: Thank you. Just a  
11 follow-up, and I think Commissioner Simpson has  
12 an additional question.

13 A question for Eversource. Do you have  
14 any suggestions on how the Commission could be up  
15 to speed, stay up to speed on the updated  
16 computer systems, the rollout in Massachusetts,  
17 what that would mean to New Hampshire, and the  
18 costs and so forth? Do you have any advice for  
19 how we could keep up with this important topic?  
20 Because it affects more than this, this topic --

21 MS. CHIAVARA: Absolutely.

22 CHAIRMAN GOLDNER: -- these rates, *et*  
23 *cetera*, it's intertwined with a lot of the work  
24 that we do here at the Commission.

1 MS. CHIAVARA: Sure.

2 CHAIRMAN GOLDNER: Do you have any  
3 advice for how we could do that?

4 MS. CHIAVARA: I sure wish I did. It  
5 seems like we could come up with something. I  
6 can take it back. And we don't really have a  
7 formal process for just, I guess, informing.  
8 Could I submit a letter with some sort of  
9 suggestion, would that work?

10 CHAIRMAN GOLDNER: That would be very  
11 helpful. Thank you for that.

12 MS. CHIAVARA: Okay.

13 CHAIRMAN GOLDNER: Yes. Thank you.  
14 Commissioner Simpson.

15 CMSR. SIMPSON: It was a similar  
16 question. And, really, I'm trying to understand  
17 the balance between upgrading systems and  
18 spending money on a system that's going to go out  
19 of vogue at some point in the relatively near  
20 future. And understanding how the Company  
21 intends to roll out these enterprise systems  
22 across multiple states, because I would presume  
23 that, at some point in the future, the Company  
24 would seek cost recovery, at least for a portion

1 of those systems. That maybe you roll it out in  
2 another jurisdiction first. But it seems  
3 reasonable that would you leverage it across your  
4 service territories.

5 Thanks.

6 CHAIRMAN GOLDNER: Thank you. Anything  
7 else from the Commissioners?

8 *[No verbal response.]*

9 CHAIRMAN GOLDNER: No? Mr. Below.

10 MR. BELOW: Thank you, Mr. Chairman.

11 I feel somewhat compelled to comment on  
12 a comment that Ms. Chiavara just made, which is  
13 that they're "able to provide all the data  
14 elements that the rules require."

15 If that's true, we haven't received  
16 some of the data that we think the rules require,  
17 from Eversource or Liberty. But we're trying to  
18 work with the utilities to sort that out at this  
19 point. So, it's just we have a different view on  
20 that at the moment.

21 CMSR. SIMPSON: Have you had data  
22 issues with the Co-op or Unitil?

23 MR. BELOW: None with Unitil. They  
24 have been very responsive, and have been able to

1 perform within the timeframes with the data  
2 required.

3 The Co-op has sought a number of  
4 waivers on some of the elements. But they have  
5 also been often the first to respond, where  
6 there's a town with multiple utilities. So,  
7 they're trying to be very responsive.

8 There's both time issues with Liberty,  
9 in part, because the email that they set up  
10 wasn't actually getting the emails to anyone.  
11 So, they didn't realize we made some of the data  
12 requests, until I figured out, between Christmas  
13 and New Years, that, you know, I actually got a  
14 response that it wasn't working. And that, for  
15 some reason, their email system only worked  
16 internally, external emails to their formal  
17 address. That was just a mix-up.

18 But, aside from that, yes, we're just  
19 trying to work with both Eversource and Liberty  
20 to resolve these issues.

21 CMSR. SIMPSON: Thank you.

22 CHAIRMAN GOLDNER: Okay. Anything else  
23 that anyone would like to highlight before we  
24 adjourn?

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*[No verbal response.]*

CHAIRMAN GOLDNER: Okay. Very good.  
So, I'll thank everyone for their time today.  
And we are adjourned.

***(Whereupon the prehearing conference  
was adjourned at 9:35 a.m., and a  
technical session was held thereafter.)***