EXHIBIT
Exh 3
DE 23-091

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 23-091

Date Request Received: February 15, 2024 **Date of Response: February 20, 2024**
Data Request No. RR-006

Request from: New Hampshire Public Utilities Commission

Witness: Littlehale, Parker

Request:

Eversource is requested to provide a complete accounting of the derivation of the (approximately) $71 million Cumulative Reduction Factor (CRF) balance presented by the Company in this proceeding, beginning with the first overmarket dollar (since the commencement of plant operation). We note that the current total overmarket amount is approximately $171 million. Use Jan 31, 2024 as the end date.

Response:

Please see Confidential Attachment RR-006 for the detailed information requested regarding the derivation of the Cumulative Reduction Factor (CRF) since initial operation of the Burgess plant. This is in the same format as provided to Burgess at the end of each PPA operating year.

As noted in the response to RR-005, the Excess Cumulative Reduction (ECR) (The ECR is a portion of the CRF in excess of $100 million) captures the difference between the energy payments to Burgess under the PPA, which is the generation produced by the plant valued at the PPA contract rate, versus the value of that generation delivered to the ISO New England wholesale power market.

In a simplified example, if the Burgess facility generated 40,000 MWh during a month and the PPA contract rate was $85/MWh while the wholesale power price was $50/MWh:

- **Energy payments to Burgess at PPA rate**: 40,000 MWh x $85/MWh = $3.4 million.
- **Value of Burgess generation delivered to wholesale power market:** 40,000 MWh x $50/MWh = $2 million.
- **Monthly change in ECR**: $3.4 million - $2 million = $1.4 million added to the ECR.

Conversely, if the Burgess facility generated 40,000 MWh during a month and the PPA contract rate was $85/MWh while the wholesale power price was $125/MWh:

- **Energy payments to Burgess at PPA rate: :** 40,000 MWh x $85/MWh = $3.4 million.
- **Value of Burgess generation delivered to wholesale power market:** 40,000 MWh x $125/MWh = $5 million.
- **Monthly change in ECR**: $3.4 million - $5 million = $1.6 million subtracted from the ECR.

Replicating that calculation over the term of the PPA has led to an ECR amount over the $100 million cap for the period ending December 31, 2023 in the total amount of $70.9 million, as filed with the Commission on January 16, 2024 in Docket No. DE 19-142 (and see the update letter dated February 2, 2024 filed in that docket).

It should be noted that the ECR calculations described above continue to apply even while netting against payments to the Burgess plant are implemented with respect to periods after November 30, 2023. As a result, the ECR amount is not a fixed number and will continue to change due to variable Burgess plant output and changing wholesale power market prices.

EXHIBIT
tabbies
Exh 4
DE 23-091

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 23-091

Date Request Received: February 15, 2024 **Date of Response: February 20, 2024**
Data Request No. RR-007 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Robinson, Bryant K

Request:

Eversource is requested to update its SCRC rate calculations to incorporate its current actual expenditures, position on REC's and capacity netting against the CRF balance, and latest forecast on Burgess-related costs within the Chapter 340 and Part 2 SCRC rate components, for rates effective on March 1, 2024.

Response:

Please see Attachment RR-007 that is an updated version of the Company's SCRC rate filing to reflect the following:

- Latest Forward Energy Price forecast as of Q4 2023 (vs. Q3 2023 forecast as filed on January 8th)
- CRF netting/offsets of Energy, Capacity and RECs (vs. Energy only as filed on January 8th)
- Actual amounts for December 2023 and January 2024

EXHIBIT
tabbies
Exh. 5
DE 23-091

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 23-091

Date Request Received: February 15, 2024 **Date of Response: February 20, 2024**
Data Request No. RR-008 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Robinson, Bryant K

Request:

Eversource is requested to update its reconciliation figures for the SCRC (for the February 1, 2023 through January 31, 2024 SCRC year) using actual figures through the end of January 2024.

Response:

Please see Attachment RR-008 for an updated version of the Company's January 8th SCRC rate filing that is based on the same assumptions as filed, including (i) Forward Energy Price forecast as of Q3 2023, and (ii) Excess Cumulative Reduction netting only against Energy payments (not Capacity or RECs), but shows actual amounts for December 2023 and January 2024.

EXHIBIT
Exh. 6
DE 23-091

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 23-091

Date Request Received: February 15, 2024 **Date of Response: February 20, 2024**
Data Request No. RR-009

Request from: New Hampshire Public Utilities Commission

Witness: Robinson, Bryant K, Littlehale, Parker

Request:

Eversource is requested to provide projection scenarios for the expected costs to ratepayers for these two potential outcomes for Burgess:
(1) The Burgess PPA is severed immediately and the CRF balance is abrogated in full with no further payments made to Burgess, using the company's estimate for the total CRF balance at the time of the severing;
(2) Performance of the Burgess PPA is enforced according to the terms articulated by the Company at the January 19, 2024 SCRC hearing, through the end of the PPA term in Oct./Nov. 2033, with netting against the CRF balance reflected only for energy delivered to Eversource from Burgess.

Response:

(1) Please see Attachment RR-009(1) that is similar to Attachment RR-007 - an updated version of the Company's January 8th SCRC rate filing that reflects the following changes from that prior filing, which the Company prepared at the direction of the Commission:

- Latest Forward Energy Price forecast as of Q4 2023 (vs. Q3 2023 forecast as filed on January 8th)
- CRF netting against payments for Energy, Capacity, and RECs (vs. Energy only as filed on January 8th)
- Actual amounts for December 2023 and January 2024

In addition, Attachment RR-009(1) reflects the (i) effective termination of the Burgess PPA as of March 1, 2024, with no further payments due to Burgess on and after that date, and (ii) updated changes for the Transfer of Class I RECs and sales of RECs, as a result of effective termination of the Burgess PPA. It should be noted that the actual date of any potential effective termination of the PPA may be affected by developments in the bankruptcy proceedings pending in Delaware.

(2) Finally, please see Attachment RR-009(2), which the Company prepared at the direction of the Commission. This analysis provides illustrative performance of the Burgess PPA through the end of the PPA term. Although it is important to note that analysis is based on a number of key assumptions and projections that are reasonable under current circumstances, but are likely to prove inaccurate as the future unfolds, to a greater or lesser extent. There is no assurance that the potential impacts on Eversource customers will be as shown in the analysis. And, as requested by the Commission, the analysis is based on netting only against energy payments and not against REC or capacity payments.

Moreover, it is clear from the Debtors' motion to reject the PPA and Option Agreement that they do not intend to continue operation of the Berlin power plant if they are not authorized to reject the PPA. In particular, they maintain that "the PPA and the Option Agreement are burdensome contracts and their rejection would benefit the bankruptcy estates." (Paragraph 42). And in paragraph 45 of their motion, they state as follows:

> Company management for the Debtors, in the exercise of their duties, reviewed the PPA and Option Agreement in consultation with internal management and advisors. Based on that review, the Debtors determined that Berlin could not survive as an operating business if the PPA or the Option Agreement . . . is not rejected under Section 365(a), as any crediting of the Excess CRF against Energy payments will vitiate Berlin's cash flow, leaving it without payment for production of Energy.

Based on those representations, made publicly in their bankruptcy pleadings, there seems to be little or no chance that the Berlin Station plant will continue to operate with the PPA in effect. The attached analysis therefore does not provide meaningful information regarding a realistic future scenario but was developed to be responsive to the information request made by the Commission.