KEEGAN WERLIN LLP

ATTORNEYS AT LAW

99 HIGH STREET, SUITE 2900

BOSTON, MASSACHUSETTS 02110

TELECOPIER: (617) 951-1354

(617) 951-1400

June 11, 2024

Via electronic mail only

Daniel Goldner, Chairman New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, NH 03301-2429

Re: Docket No. DE 24-070

Public Service Company of New Hampshire d/b/a Eversource Energy Notice of Intent to File Rate Schedules

Chairman Goldner:

On behalf of Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH" or the "Company"), enclosed are the rate review materials comprising PSNH's request for rate relief in the above-captioned proceeding. The Company's filing includes a Petition for Permanent Rates accompanied by the pre-filed testimony and attachments of the Company's witnesses, along with other information required by the N.H. Code of Admin. Rules Puc 1600. Collectively, these materials provide comprehensive support for the Company's request for permanent rates.

By this submission, the Company is seeking an overall increase in annual distribution revenue of \$182 million (inclusive of the temporary rates request), based on a test-year ending December 31, 2023, adjusted for known and measurable cost changes. In addition to the proposed rate change, the Company is proposing a performance-based ratemaking ("PBR") plan that would accomplish several objectives in the public interest, including providing critical support for capital investment made to maintain the reliability and resiliency of the distribution system and stabilizing rates for customers over an extended term rather than experiencing larger rate changes at a single point in time. To accomplish this objective, the Company's proposed PBR would adjust rates annually over a four-year term according to a revenue-cap formula. In addition, the Company is proposing enforceable and informative performance metrics and an earnings sharing mechanism to flow earnings over the authorized level to customers. The Company has also included risk areas for the Company to improve the customer benefits associated with the four-year plan. Collectively, the features of the PBR plan create a balanced ratemaking approach that appropriately considers the Company's need to invest in the distribution system to maintain reliable electric service to customers, the customer's needs to have access to reliable electric service at a reasonable, affordable cost and the Commission's objective of increasing administrative efficiency for all interested stakeholders.

By this filing, PSNH is seeking temporary rates to take effect August 1, 2024 and permanent rates to take effect August 1, 2025, coincident with other rate changes that occur on

August 1st of each year. The Company understands that the summer months can be a challenge in navigating schedules. PSNH is ready and willing to make itself available immediately for discovery regarding the Company's temporary rate request and leave the discovery period open and rolling until the Department of Energy's questions are sufficiently answered. The hope would be that by the time the prehearing conference is held, the parties to the docket will have made substantial progress on temporary rates such that the parties can report that progress to the Commission, and the Commission in conjunction with the parties can sketch out a path that will allow for temporary rates to take effect on August 1.

Lastly, given the breadth of issues involved in this filing, the Company suggests that a process should be put in place to allow for active engagement by the Commission at an earlier stage of the proceeding rather than later. The Company looks forward to working with all parties in this proceeding and, as part of that collaboration, recognizes the processes that currently exist in New Hampshire do not contemplate early engagement by the Commission. In this case, the unique magnitude and degree of complexity of the Company's filing drives the conclusion that there would be significant value and administrative efficiency for the Commission to have ongoing access to all data requests and responses issued during the proceeding, as well as for the Company to respond to inquiries from the Commission throughout the docket to facilitate the Commission's information and understanding of the proposals under consideration as the docket progresses. The Company plans to prepare and submit a draft procedural schedule prior to the prehearing conference incorporating suggestions for an open and transparent review process.

The Company respectfully requests, due to the desired temporary rates effective date, that the Commission schedule the temporary rates hearing date in the order of notice, along with the prehearing conference.

If you have any questions, please do not hesitate to contact me. Thank you for your assistance with this matter. Consistent with current Commission policy, this filing is being made electronically only; paper copies will not follow.

Sincerely,

Jonathan A. Goldberg, Esq. Cheryl M. Kimball, Esq.

Jonathan Sollber

cc: DE 24-070 Service List