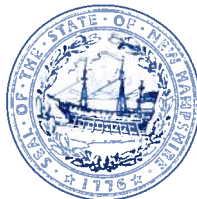


THE STATE OF NEW HAMPSHIRE

CHAIRMAN
Martin P. Honigberg

COMMISSIONERS
Kathryn M. Bailey
Michael S. Giaimo

EXECUTIVE DIRECTOR
Debra A. Howland



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:
www.puc.nh.gov

December 5, 2018

Matthew J. Fossum, Esq.
Public Service Co. of New Hampshire d/b/a Eversource Energy
780 North Commercial Street
P.O. Box 330
Manchester, New Hampshire 03105-0330

Re: DE 18-162, Public Service Co. of New Hampshire d/b/a Eversource Energy
Meter Test Report and Renewed Request for Waiver of PUC 305.03
Approving Waiver Request

Dear Attorney Fossum:

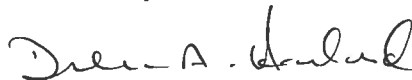
On October 17, 2018, Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) filed its 2018 Meter Test Report (Report) and a renewed request for waiver of New Hampshire Code of Admin. Rules Puc 305.03. Puc 305.03 requires electric utilities to perform periodic testing of meters for purposes of assuring meter accuracy. Eversource requested that the Commission continue the waiver granted by secretarial letter in Docket No. DE 17-127. In Docket No. DE 17-127, the Commission approved a modified waiver (Modified Waiver) request agreed upon by Eversource, Staff and the Office of Consumer Advocate (OCA). See Secretarial Letter (December 19, 2017) in Docket No. DE 17-127. The terms of the Modified Waiver changed the 12-month testing period to a calendar year period, and allowed Eversource to use the meter testing requirements contained in ANSI/ASQ Z1.9-2003 based on the high reliability of the type of meters Eversource installed for its customers. The Modified Waiver also included all self-contained single and polyphase meters within the sample testing program. In support of its request, Eversource said the Report demonstrated compliance with the testing parameters as contained in the Modified Waiver.

On November 5, 2018, Staff filed a memorandum recommending that the Commission approve Eversource's petition. Staff concluded that the Report demonstrated that the alternative testing methodology used by Eversource as set forth in ANSI/ASQ Z1.9-2003 met the requirements of the Modified Waiver. Staff recommended that the terms of the Modified Waiver be approved on a going forward basis until otherwise ordered by the Commission. Staff maintained that granting the waiver would serve the public interest, and would not disrupt the orderly and efficient resolution of matters before the Commission, consistent with the requirements of Puc 201.05.

The Commission reviewed Eversource's petition and the recommendation of Staff. Pursuant to Puc 201.05, the Commission may waive rule requirements if granting the waiver serves the public interest and does not disrupt the orderly resolution of matters before the Commission. In determining whether a request for waiver meets the public interest, the Commission must find that compliance with the existing rule to the circumstances presented is onerous, or that the purpose of the rule would be satisfied by an alternative method.

Puc 305.03 establishes meter testing requirements for the purpose of assuring meter accuracy. As the Report indicates, the alternative method used by Eversource under the Modified Waiver provides a satisfactory methodology by which to assure meter accuracy. On this basis, the Commission has found that continuation of the terms of the Modified Waiver on a going forward basis will assure that Eversource continues to adequately test meters for accuracy purposes. Accordingly, the Commission has granted the requested waiver of provisions of Puc 305.03 so that Eversource can change its sample testing protocol as contemplated in the Modified Waiver. Eversource is directed to file annual reports of the results of its meter testing program.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debra A. Howland".

Debra A. Howland
Executive Director

cc: Service List (electronically)