

STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

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

Docket No. DE 24-_____

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE
ENERGY’S PETITION FOR REVIEW OF STORM EXPENSES

Pursuant to Puc 202.01(a) and Puc 203.06, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) hereby petitions the New Hampshire Public Utilities Commission (“Commission”) for approval to recover certain storm-related expenses presently charged to the Company’s Major Storm Cost Reserve (“MSCR” or “Reserve”) for nine storms that occurred between August 2022 and September 2023.¹ More specifically, Eversource is requesting that the Commission review the cost information and documentation presented by the Company for purposes of determining the prudence of the incremental costs incurred for the 2022-2023 Storm Events. The Company is not seeking recovery of these costs at this time but will include a cost recovery proposal in the Company’s next base distribution rate proceeding. In support of its petition, Eversource states the following:

1. The MSCR mechanism was established in Docket No. DE 99-099 and allows the Company to recover from customers an annual amount through distribution rates that is used to offset costs incurred to respond to a qualifying Major Storm. Order Nos.

¹ The Company did not experience any storm events during the months of August, September, or October 2022. However, the Company’s previous storm cost recovery filing covered the period through July 2022 and accordingly this filing is intended to cover any qualifying storm events that occurred beginning in August 2022. Similarly, while the Company did not experience any storm events during the time period of April 2023-September 2023 these months are acknowledged because the Company’s future storm cost recovery filing would include storms beginning with October 2023.

23,443 and 23,549 (2000).² Since 2013 the Company has collected \$12 million annually, or \$1 million per month, to fund the MSCR. See Order No. 26,433, at 13 (2020) (confirming annual funding amount). The Commission approved recovery of specific pre-staging costs through the MSCR in Docket No. DE 12-320; prestaging costs are costs incurred for an event that does not ultimately rise to the level of a Major Storm.³ Order No. 25,465 (2013).

2. Costs incurred by Eversource for restoration of service during a weather event qualifying as a Major Storm are charged to the MSCR as a deferred asset. Eversource simultaneously records a liability into its MSCR equal to the amount that it recovers from customers. In this way, the \$12 million in annual revenues recovered in base rates to fund the MSCR does not result in earnings accruing to Eversource.
3. By this petition, and consistent with the Commission's March 26, 2019 secretarial letter in Docket No. DE 18-058, and the settlement agreement approved in Docket No. DE 19-057, Eversource seeks review of the costs of the following nine Major Storm and Pre-Staging events that occurred from August 2022 to September 2023: (1) November 30, 2022 Major Storm; (2) December 15, 2022 Major Storm (including Pre-Staging event); (3) December 23, 2022 Major Storm (including Pre-Staging event); (4) January 20, 2023 Major Storm; (5) January 22, 2023 Major Storm (including Pre-Staging event); (6) February 3, 2023 Major Storm; (7) February 22, 2023 Pre-Staging event;

² A Major Storm is defined as an event that results in either: (a) 10% or more of Eversource's retail customers being without power in conjunction with more than 200 reported troubles; or (b) more than 300 reported troubles during the event. See Order No. 25,465, at 1.

³ The Testimony of David L. Bickford filed December 19, 2012 in Docket No. DE 12-320 provides a description of the types of pre-staging costs permitted to be recovered through the MSCR.

(8) March 2, 2023 Pre-Staging event; and (9) March 13, 2023 Major Storm (including Pre-Staging event) (collectively the “2022-2023 Storm Events”). Eversource has compiled all documentation in support of these costs and the details for each 2022-2023 Storm Event are set forth in the direct testimony filed in support of this Petition. The Company would typically request recovery of storm costs through its MSCR Fund. However, as stated in the Company’s February 26, 2024 letter filed in Docket No. DE 23-051, the MSCR Fund has been depleted to zero as a result of the storm costs approved in Docket No.’s DE 22-031 and DE 23-051. The storm costs approved in Docket No.’s DE 22-031 and DE 23-051 resulted in a cumulative unrecovered storm cost balance as of January 31, 2024 totaling \$29,014,841.⁴ Accordingly, any additional recovery in the MSCR Fund will be used to offset the cumulative unrecovered storm cost balance, including carrying charges, until such costs have been recovered. Given that the MSCR Fund is fully depleted, the Company is not seeking to recover the storm costs in this filing through the MSCR Fund. Rather, in its next base distribution rate case filing, the Company will propose to establish a separate MSCR cost recovery mechanism for these storm costs, plus carrying charges, on an amortized basis to take effect at the time new base rates are set. As such, in this docket, the Company seeks to complete the prudence review for the 2022-2023 Storm Event costs in advance of the next base distribution rate case filing. To support the prudence review of the costs incurred by the Company to respond to the 2022-2023 Storm Events, the Company has compiled all supporting documentation; this supporting documentation is being

⁴ See letter from Eversource to the Commission providing confirmation of storm cost recovery total and the resulting MSCR Fund balance filed on February 26, 2024 in Docket No. DE 23-051.

provided to the Department of Energy's Audit Division together with a copy of this filing⁵).⁶

4. With this petition, Eversource provides the joint direct testimony of Yi-An Chen, Denise M. Consentino, and Leanne M. Landry presenting (a) the cost itemization; and (b) cost tracking and documentation process for the 2022-2023 Storm Events. The Company is also providing the direct testimony of Dean C. Desautels demonstrating that the costs were necessary to restore power to customers in a reasonable timeframe, consistent with the parameters established in the Company's ERP for each level, and were prudently incurred.
5. Eversource does not seek any adjustment to rates to account for the costs incurred related to the 2022-2023 Storm Events in this proceeding. The Company will commence recovery of these costs on an amortized basis when new base rates are set in a subsequent, base distribution rate case proceeding. The Company seeks to complete the prudence review for the 2022-2023 Storm Events costs in advance of the next base distribution rate case filing in the interest of administrative efficiency.

⁵ The Company notes that the amounts included in the invoice index (Attachment ES-COST-14) will not exactly match the invoices provided in support of the 2022-2023 Storm Events because the invoices include costs that are not applicable to the 2022-2023 Storm Events (i.e., the invoices will show amounts greater than the amounts included in the index in certain instances).

⁶ The Company's most recent petitions for recovery of storm expenses have been resolved following an audit by the Department of Energy's Audit Division without additional process (i.e., these dockets were resolved without a formal discovery process or hearing). See Docket Nos. DE 21-089, DE 22-031, and DE 23-051. In response to feedback from the Department of Energy prior to preparation of this filing the Company has compiled all supporting documentation in support of this filing and is providing that supporting documentation to the Audit Division. The Company will also provide any and all documentation to the Commission, Department of Energy, or Office of the Consumer Advocate to assist their review. Attachment ES-COST-14 provides an invoice index of the Company's supporting documentation including bates page references to the invoice support being provided to the Audit Division. The Company will also provide invoices as requested by the Audit Division to facilitate review (i.e., the Company is providing all invoices but in recognition of the volume of information that may overwhelm the review process will also provide specific invoices or batches of invoices, as requested).

WHEREFORE, Eversource respectfully requests that the Commission grant this Petition and order such further relief as may be just and equitable.

Respectfully submitted this 8th day of March, 2024,

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A
EVERSOURCE ENERGY

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Certificate of Service

I certify that on March 8, 2024, a copy of this petition has been electronically forwarded to the Service List in DE 23-051.

/s/ David Wiesner
David K. Wiesner, Esq.