Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-001 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

Please provide Attachment ES-DPH-1 in Excel workbook format, including all formulae and links intact.

Response:

Please refer to Attachment PUC 1-001 for the Excel workbook version of Attachment ES-DPH-1 provided with the Company's initial filing on June 11, 2024.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-002 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

Please provide Attachment ES-DPH-2 in Excel workbook format, including all formulae and links intact.

Response:

Please see Attachment PUC 1-002 for the Excel workbook version of Attachment ES-DPH-2 provided with the Company's initial filing on June 11, 2024.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-003 **Page 1 of 4**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

Why is the 2026 PBR Plan estimated revenue increase for 2026 significantly higher than the estimate for 2027 and 2028? Why is the estimated K-bar adjustment significantly higher in 2026 than in 2027 and 2028? (Ref. Foley et al., pp. 53-56)

Response:

As a short answer, the estimated K-bar adjustment is higher in 2026 than in 2027 and 2028 because 2026 is a transition year and encompasses two years of capital additions. This transition point only occurs at the start of the PBR Plan and would not recur so long as the K-bar continues to operate year-to-year. However, examining this question, the Company has a proposed solution to this transition issue and the following discussion addresses this proposal.

The Company's initial filing in this proceeding reflected two key assumptions that are relevant to the response to this information request.

First, the Company's original assumption when its filed the case was that permanent rates set in this proceeding would rest on a historical test year of plant additions for test year-ending December 31, 2023 and, through the course of the proceeding, the Company would have the opportunity to update the initially filed revenue requirement to reflect actual plant additions through December 31, 2024 (see, e.g., pre-filed testimony of Botelho and Chen at Bates Page 01608). With this update through December 31, 2024, the "cast-off point" for the four-year term of the PBR would be sufficient to support a stay-out because plant additions through the most recent date possible (i.e., December 31, 2024), would be accounted for in rates. The system's capital requirements are increasing and will be a driver of repeated rate cases unless a rate plan is put in place to allow for systematic recovery. Consequently, it is critical that the "cast-off rates" accurately reflect current costs (and cost trends), inclusive of infrastructure investments in the system.

With an update of capital additions through December 31, 2024 included in "cast-off rates," new permanent rates would take effect on August 1, 2025, and the first PBR adjustment (and K-bar) would take effect on August 1, 2026. By that point, the lag in recovery for capital investment would be almost two years (19 months), creating the need for a one-time "catch-up" adjustment to

K-bar, which is reflected in first K-bar taking effect on August 1, 2026. As noted above, this one-time "catch up" only occurs once – at the point of transition to PBR from a base-rate proceeding.

Now that the procedural schedule is set for this proceeding, it is clear that the Company will ***not*** have the opportunity to update the record for capital additions completed through December 31, 2024.[1] Unfortunately, this means that an even bigger gap would exist between the permanent rates taking effect on August 1, 2025, which will now include capital additions only through December 31, 2023, and the first K-bar adjustment – creating a gap of approximately 31 months rather than 19 months. This lag is untenable for the start of a PBR Plan with an extended stay-out period.

Therefore, to answer this question and address the logistical challenges now presented by the procedural schedule in this proceeding, the Company has developed a practical modification to its initial filing proposal that would "smooth out" rate changes for customers as compared to the Company's initial proposal. This proposal is outlined below. However, it is important to note that these elements are intertwined and cannot be segregated without disrupting the methodological integrity of the PBR framework.

1. The Company's rate filing contemplated the inclusion of 2024 capital additions in permanent rates. In this alternative, the Company would remove 2024 capital additions from the permanent base rate request, lowering the request by $24 million. Permanent rates set on August 1, 2025 would recover the costs of capital investment through December 31, 2023.

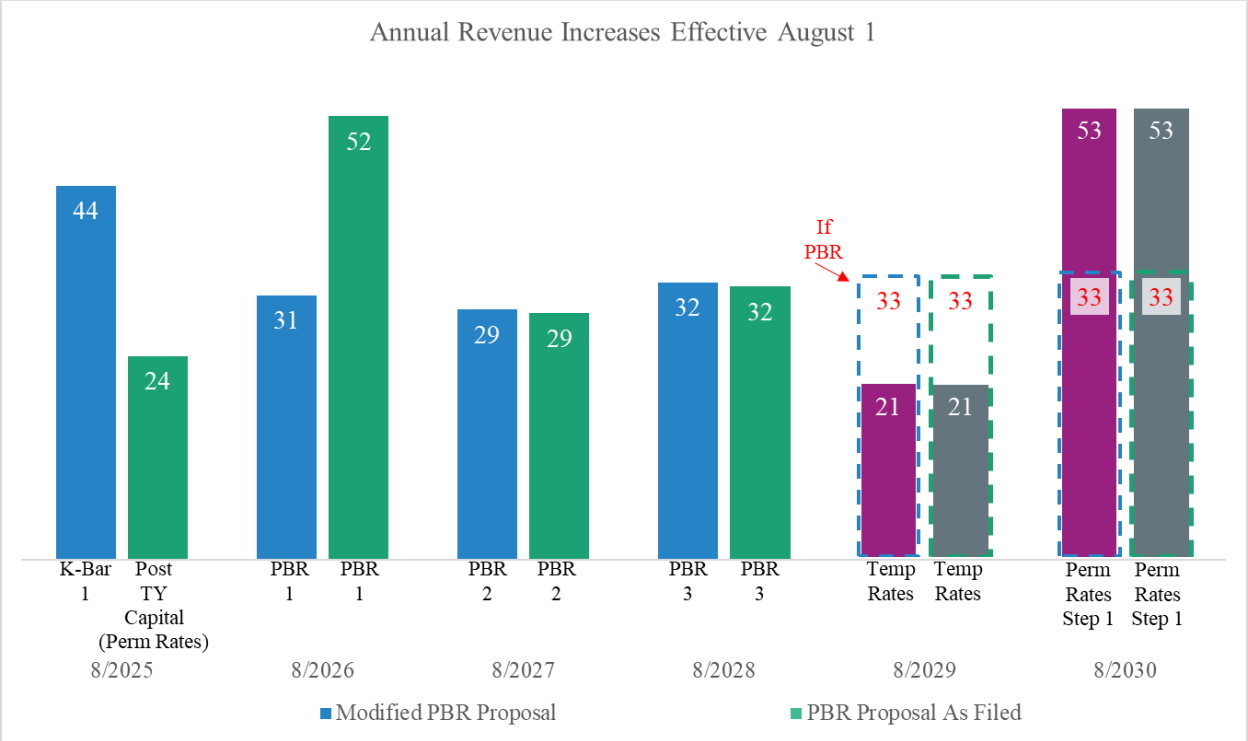
2. The first K-bar adjustment would take effect on the same date, on August 1, 2025, which is identical to how step adjustments normally work with the first step taking effect coincident with permanent rates. This first K-bar adjustment would total $44 million. In this alternative, the Company would ***not*** implement the other components of the PBR rate adjustment as those adjustments on August 1, 2025, because those adjustments would be duplicative to known and measurable changes addressed in permanent rates taking effect August 1, 2025.

Under this alternative proposal, the first K-Bar adjustment is still larger than the subsequent K-bar adjustments ($44 million on August 1, 2025, as compared to approximately $30 million annually thereafter). However, the tangible benefits of this change are that it limits the magnitude of

[1] Based on the currently contemplated procedural schedule, it is not feasible to compile and produce project documentation in time for a prudence review that could be subject to discovery and evidentiary hearings, which is a necessity for all parties involved.

subsequent K-bar adjustments (taking effect on August 1, 2026 and thereafter), and it solves for the inclusion of 2024 capital additions, while also "catching up" to rate year levels of capital.

In the chart below, the Company's initial proposal and alternative proposal are presented graphically in the chart below. The Company's original presentation is presented in the green bars, while the modified proposal is presented in the blue bars. The chart does ***not*** include the permanent rate change to take effect on August 1, 2025, which would be in addition to the amounts reflected below.



As shown above, the Company's alternative proposal would result in a K-bar increase effective August 1, 2025, of $44 million. This number compares to the 2024 capital additions reflected in the Company's permanent rate application of $24 million, which means that the Company's alternative proposal is $20 million greater on August 1, 2025, than the Company's initial filing request. However, conversely, the Company's alternate proposal ***lowers*** the PBR adjustment effective August 1, 2026 by $21 million, as compared with the Company's original computation of $52 million on that date. The chart below also demonstrates that annual rate changes under either approach after the first two rate years are essentially identical.

Looking forward, the chart demonstrates an important benefit of the PBR Plan, which is future rate stability once the transition to a PBR framework is made. Specifically, the chart shows that the Company is anticipating a rate case to be filed for temporary rates effective August 1, 2029 based on a calendar year-end plant in service of December 31, 2028. In that case, permanent rates are assumed to take effect August 1, 2030, with a roll-forward of plant through December 31, 2029, similar to the Company's initial proposal in this proceeding.

For "8/2029" and "8/2030," the solid magenta and green/gray bars reflect a temporary and permanent rate change computed using the estimated revenue deficiency at that time. With a smaller increase in 2029 of $21 million (for temporary rates) followed by a relatively larger increase in 2030 of $53 million (for permanent rates). These bars indicate the impact of ending the PBR Plan and conducting a traditional rate case. The blue and green dotted lines shown for "8/2029" and "8/2030" show the illustrative revenue increases assuming ***no rate case*** and – instead – continuation of the PBR and K-bar framework. With continuation of the PBR framework, the annual increase is lowered to $33 million per year. The important point here is that the impact to customers would be smoothed considerably as compared to the traditional model of temporary rates followed by a permanent rate change.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC-1-004 **Page 1 of 2**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

On p. 42 of the testimony of Foley et al., they describe the commitment to a four-year stay-out term as a commitment to abstain from filing a new petition for base rates that would take effect before August 1, 2029. Is there any commitment to limit when a new rate case would be filed? Under what circumstances would the Company file for rate increases or adjustments before August 1, 2029?

Response:

As explained in the Testimony of Foley, Coates, and Horton, at Bates Pages 01414-01417, the Company is proposing a four-year PBR plan that commences on August 1, 2025 and runs through August 1, 2029. If approved, the Company would submit three annual PBR adjustments that would take effect on August 1, 2026, August 1, 2027, and August 1, 2028. The Company would have the opportunity to file a rate case consistent with the timing requirements of Puc 1603 and Puc 1604 for new base distribution rates effective August 1, 2029, unless the Company requests and the Commission grants an extension, as discussed on Bates Pages 01415 through 01417. Pursuant to Puc 1603, utilities must file proposed changes to tariffs at least 30 days prior to the proposed effective date of the tariff. In addition, pursuant to 1604.05, utilities must file a notice of intent to file a proposed rate case at least 30 days prior to the actual filing of such case. Accordingly, the Company would file its next base distribution rate case no later than July 1, 2029, with an effective date of new based distribution rates of August 1, 2029.

The Company's proposed PBR includes a commitment by the Company that, provided a PBR framework is adopted that is methodologically sound and adhering to standard ratemaking and regulatory principles for establishing a level of rates, the Company would agree to refrain from filing for a change in base distribution rates for rates effective prior to August 1, 2029. The Company has proposed an "off ramp" which would apply *only* in the case that the PBR term were extended, in which the Company would be able to file a rate case in the event the actual earned ROE fell below 7 percent for two consecutive quarters. This "off ramp" would not apply during the original term of the proposed PBR Plan, but would only apply following extension of the PBR framework.

The proposed PBR Plan does include an exogenous cost provision to adjust for certain cost changes (up or down) that would apply in limited circumstances, such as: (1) State Initiated Cost Change,

such as a change in tax code; (2) Federally Initiated Cost Change, such as a change in tax code; (3) Regulatory Cost Reassignment; or (4) Externally Imposed Accounting Rule Change.

The purpose of the exogenous cost factor is to provide a guardrail for events that result in a significant cost change that could upset the balance of the PBR plan during the term. In order for the Company to commit to stay-out under the PBR plan, there must be a mechanism to allow the Company to request and receive recovery of unforeseen costs that are significant, outside of its control, and resulting from a "trigger" event that causes a change to the costs of service.

To ensure that an exogenous event is significant enough to justify an administrative proceeding to determine whether an event was outside the Company's control and adjust rates, the Company has proposed a significance threshold of $1.5 million. This threshold defines whether an exogenous event is significant. If a significant exogenous event occurs, the Company may petition the Commission for approval to recover the costs associated with the exogenous event. If the Company can demonstrate that an event is an exogenous event, the Company would recover the cost impact of the significant, unforeseen event that would hold the Company neutral to that unforeseen impact for the duration of the PBR term so that the Company can maintain its commitment to not file a new base distribution rate case for rates effective prior to August 1, 2029.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-005 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

Is the three-year historical average that will be used in calculating the K-Bar allowance (referenced on p. 43 of Foley et al.) a rolling average of the most recent three years that updates over the 4-year term of the K-Bar? Or would it remain fixed as the three years ending December 31, 2025? (see Foley et al., p. 51)

Response:

The Company's is proposing to use a rolling three-year average in the calculation of the K-bar. At the time of each of the Company's proposed annual PBR filings, the K-bar average used to approximate rate base through the appropriate rate year would be based on actual plant additions, as reported in the Company's annual FERC Form 1 filing, through the year prior to the filing. For example, in the Company's 2026 PBR filing for rates effective August, 1, 2026, the average used to build that year's representative distribution rate base would rely on an average of plant additions for the years 2023-2025. The subsequent year's PBR filing would rely on an average of plant additions for the years 2024-2027, and so on.

Use of a fixed average established at the outset of the PBR term would create a material deficiency in the PBR Plan, by breaking the link between the distribution system's actual system needs and PBR revenue adjustments, undermining the Company's ability to commit to a four-year stay-out. The intent of the PBR and K-bar framework is to keep pace with the level of system investments that are needed to sustain the system, preventing pile-ups of capital cost recovery that causes "chunky" rate changes.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 25, 2024**
Data Request No. PUC 1-006 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

At what threshold would net metering reach a significance threshold that would undermine the long-term balance and stability of the PBR plan? (Ref. Foley et al., p. 43)

Response:

As discussed in the Testimony of Foley, Coates, and Horton, at Bates Pages 01412-01413, the Company plans to examine whether changes in net metering could undermine the long-term balance and stability of the PBR plan under the proposed exogenous cost threshold.

As discussed in response to PUC 1-004, the Company has proposed a significance threshold of $1.5 million to determine whether an event, including changes in net metering, may constitute an exogenous event.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-007 **Page 1 of 2**

Request from: New Hampshire Public Utilities Commission

Witness: Ntakou, Elli, Renaud, Paul R., Schilling, Jennifer A., Walker, Gerhard, Freeman, Lavelle A.

Request:

Please provide information on the number and cost of co-optimized reliability projects over the most recent five years. Please provide an electronic workpapers table (with formulae and links intact) identifying each such project, related FERC account number, related Company Accounting Manual account number, budgeted and actual installed cost and difference between budgeted and actual, how it was expected to be and actually was financed, depreciable life & depreciation method (for ratemaking and tax purposes), and accumulated depreciation as of the end of the test year. Are there any specific co-optimized projects currently known for 2025-2028? If so, please provide an electronic workpapers table (with formulae and links intact) with each project, related FERC account number, related Company Accounting Manual account number, estimated installed cost, how it is expected to be financed, depreciable life & depreciation method (for ratemaking and tax purposes) and projected for the rate years. (Ref. Foley et al, pp. 59-60)

Response:

Over the past five years, Eversource has not undertaken any "co-optimized project solutions" as defined in the Distribution Solutions Plan ("DSP"). Projects to-date have followed a traditional path of being either a customer project to meet the need for an individual distribution customer or a system project benefiting all distribution customers in a wider service area.

Co-optimization investments are incremental investment opportunities to co-optimize customer-driven projects. The timing, scope and type of project needed to serve the needs of an individual customer are not within the control of the Company. Therefore, the Company cannot plan for these projects in the same way as standalone projects that benefit the overall distribution system. When these customer projects do arise, there can be a significant cost that is outside the Company's operating plan. Within a PBR term, with the constraints of the PBR mechanism and associated K-bar mechanism, the Company does not have the flexibility to take these projects on without experiencing financial detriment. At the same time, there can be a benefit to the overall system that arises from these projects; hence creating the potential for co-optimization opportunities. Within the constraints of the PBR Plan, the Company requests that the Commission provide the Company with the flexibility to pursue co-optimization if such opportunities arise during the PBR term.

Although co-optimization projects are less certain, the Company has identified two projects in the DSP with the potential for co-optimization during the PBR term. Specifically, the Company has identified the Northern Reliability Loop (prospective redevelopment of an existing site in the North Country that would provide an opportunity to upgrade existing infrastructure), and the Manchester-Boston Regional Airport (electric infrastructure modifications and investments for airport load growth and electrification needs that would provide an opportunity to improve service reliability for a wider customer base). Since these customer projects are still in the conceptual phase and specific needs and solutions are still being identified, Eversource does not presently have workpapers, costs and other requested information for these solutions.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-008 **Page 1 of 3**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

Reference Foley et al, p. 60-61. Please re-state/clarify how the grid enhancements not currently contemplated in the Companys five-year expenditure forecast would be constrained by the K-bar mechanism, given that they would be excluded from calculation of the 10% variance cap?

Response:

The incremental projects referenced in this question are grid enhancements not currently contemplated in the Company's five-year expenditure forecast. These grid enhancements are outlined in the distribution system plan, as follows: (1) enhanced resiliency programs; (2) a set of grid modernization investments, including volt/var optimization (VVO); and (3) Company-owned solar. If undertaken, these grid-enhancement projects would provide customers with increased benefits of modern grid technologies. In addition, the Company has proposed to undertake co-optimized reliability projects. Co-optimized opportunities to build capacity and additional feeders significantly improve reliability for all customers by: (1) adding more operational flexibility to supply demand during emergencies; (2) improving feeder design such that there are less customers to be in each protection zone; and (3) creating more circuit ties to safely reconfigure the system after failures.

The Company is sensitive to the fact that overall affordability is a concern and understands that gradualism is an important concept for grid-modernization investment in New Hampshire. The Company further recognizes that the Commission may or may not be prepared to pursue the grid modernization investments discussed in the Distribution Solutions Plan ("DSP") that go above and beyond the basic system needs that the Company is planning for over the next four to five years. Because there is an underlying policy decision that is attendant to taking steps forward on a grid-modernization approach, the Company seeks the Commission's authorization to pursue these types of investments during the PBR term.

As further explained in the Testimony of Freeman, Schilling, Ntakou, Walker, and Renaud (Bates Pages 02001-02003), the proposed grid-modernization enhancements would provide significant benefits to customers by hardening the distribution system, improving control room technology, optimizing the system through voltage management, and providing additional planning tools for advanced forecasting and distributed energy resource interconnection. These investments,

however, require a material level of revenue support and would need to be prioritized after core electric operation investments without adequate revenue support.

Regarding co-optimized projects, these potential co-optimized reliability enhancement opportunities are limited and infrequent; however, in certain instances, the projects are significant. Therefore, when the projects arise, there is a direct and distinct benefit to both the customer and the system to move ahead with the "co-optimization" of the system upgrade. However, because these projects are motivated by the customer, the projects are not encompassed within the Company's capital plan making these projects appropriate candidates for an exception to the investment cap that would otherwise pertain to the Company's projects.

If the Commission makes the policy decision to authorize the Company to pursue these investments in parallel with other required core electric operation investments, the Company will do so. If the PBR plan is approved as proposed by the Company (including with the K-bar mechanism and the adjustment to the cap associated with these programs as described in the testimony of Foley, Coates, and Horton at Bates Pages 01404-01405), the Company will have the necessary revenue support to implement the proposed grid modernization, resiliency, and co-optimization investments without the need for an additional cost reconciling mechanism outside of base rates.

As noted in the referenced testimony, calculation of the ten percent variance cap would need to exclude the costs of these programs given that these projects are not currently reflected in the Company's long range capital budget that is used as the basis for determining K-bar investments allowable under the cap. However, the investments would be subject to the averaging plant activity used for the purposes of K-bar. The K-bar design inherently limits the degree to which actual plant-in-service differs from the average utilized in the K-bar computation, and to the extent the actual plant in service differs from the forecasted activity by more than ten percent. Based on the Company's capital investment projections, the Company would have a persistent gap in capital investment recovery between what the PBR would produce for revenue support and what the actual revenue requirement on incremental capital would be due to the significant ramp-up in capital expenditure needs on the system. Importantly, the K-bar calculation is susceptible to monitoring and evaluation creating an assurance that the formulaic approach does not over-compensate the Company for its capital investment.

The Commission's authorization in this proceeding will give the Company the go ahead to undertake the grid modernization and co-optimization investments at the pace described in the DSP. Notwithstanding this authorization, the Company would continue to be subject to a requirement to demonstrate the prudence of each investment at the time of the next base distribution rate proceeding and would be subject to regulatory lag on these investments, as well

as other capital investments, as a result of the K-bar averaging, maintaining the incentive properties inherent in the PBR/K-bar mechanism on these additional investments, as well.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 25, 2024**
Data Request No. PUC 1-009 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Horton, Douglas P.

Request:

Reference Foley et al pp. 67-68. Within the past ten years, have there been any events that the utility considered to be exogenous cost factors? If so, what were they?

Response:

The Company's most recent exogenous cost mechanism was approved in Docket No. DE 09-035. Eversource is able to provide data beyond the last ten years, dating back to calendar year 2011, which was the first year that the exogenous events mechanism was applied. The Company is providing Attachment PUC 1-009 with this response, providing the annual certifications for exogenous events for calendar years 2011-2016, which are the years to which the settlement agreement applied. Please note, no exogenous events were reported for any of those years.

Calendar years 2017-2023 exclude all generation divestiture-related matters, spanning 2015-2020, which was handled in several dedicated proceedings including Docket Nos. 14-238, 16-817, 17-096, 17-124, and culminating with the generation divestiture cost audit Docket No. DE 20-005. Please note, there were no events that would have qualified under the Company's criteria for the exogenous events mechanism proposed in this docket.

One possible exception would be the compliance costs for the Puc 2200 rules, enacted in October of 2022. Compliance with the Puc 2200 rules could potentially cross the exogenous events threshold at some point, as there are a couple of multi-million dollar compliance items presently before the Commission. However, to date, compliance with the Puc 2200 rules currently totals approximately $800,000. The adoption of the Puc 2200 rules is the type of event that the Company's proposed exogenous events mechanism is intended to capture – that is, a state mandate requiring that the Company incur costs over which there is no discretion, initiative or control. Assuming the $1.5 million threshold is exceeded in any given calender year, the Puc 2200 rules would be the only event that would qualify as an exogenous event in the last 12 years.

Although it was not treated as an exogenous cost event, the Tax Cuts and Jobs Act of 2017 significantly reduced the corporate income tax rate from 35 percent to 21 percent, among other changes. If a similar change, positive or negative, were to occur in the future, it would meet the definition of an exogenous event as proposed by the Company in this proceeding.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-010 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Please provide the calculations of standard deviations for SAIDI targets in electronic workpapers format with formulae and links intact.

Response:

Please refer to Attachment PUC 1-010.

Please note that the Company has modified the presentation of the calculations in Attachment PUC 1-010 compared to Testimony of PBR Metrics Panel, Table 1 (Bates Page 01928). In Attachment PUC 1-010, the Company has provided the calculation of the five-year average and standard deviations in the year the targets would apply, rather than in the last year included in the five-year average. For example, the five-year average of 2019-2023 is presented in year 2024 in Attachment PUC 1-010, rather than in 2023.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-011 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Please provide the calculations of standard deviations for MBI targets in electronic workpapers format with formulae and links intact.

Response:

Please refer to Attachment PUC 1-011.

Please note that the Company has modified the presentation of the calculations in Attachment PUC 1-011 compared to Testimony of PBR Metrics Panel, Table 2 (Bates Page 01929). In Attachment PUC 1-011, the Company has provided the calculation of the five-year average and standard deviations in the year the targets would apply, rather than in the last year included in the five-year average. For example, the five-year average of 2019-2023 is presented in year 2024 in Attachment PUC 1-011, rather than in 2023.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-012 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Ref. Testimony of PBR Metrics Panel, p. 15, lines 1-2. Please clarify what quartiles are being referred to in the phrase, the present day reliability reality where the NH reliability measures since 2019 have been within first and second quartile to the present day.

Response:

Each year the Institute of Electrical and Electronics Engineers Distribution Reliability Working Group ("IEEE DRWG") collects reliability data from electric utilities across the country for its Annual Reliability Benchmarking Study, with results for the preceding year published each Fall. The IEEE-DRWG provides members with an overall analysis of reliability trends as well as industry-wide quartiles.

Eversource uses the data provided by the IEEE-DRWG to calculate quartiles for Months Between Interruption ("MBI") and System Average Interruption Duration Index ("SAIDI") performance for our specific peer group. Our peer group, which represents all Northeast and Mid-Atlantic participants, is based on fact that these utilities operate similar electrical systems and face comparable weather patterns. The size and composition of this peer group varies from year to year but is generally between 25 and 35 utilities.

Since 2019, New Hampshire reliability performance has fallen within the calculated ranges for the first or second quartiles compared with the other Northeast and Mid-Atlantic companies that have participated in the survey.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-013 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Ref. Testimony of PBR Metrics Panel, p. 13, line 7 through p.14, line 30. Please identify any other utilities that use the same exclusions in calculating their SAIDI metrics and provide any comparative data on the SAIDI metrics of utilities that use the same exclusions proposed here.

Response:

Our peer group for benchmarking purposes reports annual reliability data to the Institute of Electrical and Electronics Engineers Distribution Reliability Working Group ("IEEE DRWG") each year based on the industry standard IEEE 1366, which defines the exclusions in calculating SAIDI metrics. From the submitted data, the IEEE DRWG is able to provide us with peer results that are aligned with the reporting standard we propose. Per the longstanding IEEE DRWG procedure, all results are anonymized using unique identifiers for participating companies. These data are shown in Attachment PUC 1-013 CONFIDENTIAL.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-014 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Is there any evidence the Company can present that current Eversource SAIDI performance, which will serve as the basis for the proposed benchmark, represents a satisfactory level of performance, benchmarking against other comparable utilities?

Response:

The Company's SAIDI performance in 2022 and 2023 ranked in the top quartile compared with industry peers (having ranked high in the second quartile the prior two years) under the Institute of Electrical and Electronics Engineers ("IEEE") ranking of industry reliability performance. By generally accepted utility standards, this would qualify as a satisfactory reliability performance.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-015 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Under the Company's proposed methodology for setting a SAIDI and a MBI performance metric, as detailed in the Testimony of the PBR Metrics Panel, pp. 12-17, our understanding is that if the Company fails to meet performance targets, the result is that targets will be lower in subsequent years. Is this correct?

Response:

It is correct that, if the Company continually failed to meet performance targets, use of a rolling average in the performance metric would allow a continuous downward trend in performance. However, it is not the Company's intention to fail the performance metrics, nor is it the Company's expectation that an increasing level of investment would produce decreasing performance. With any level of investment, performance will vary year-to-year (up and down) due primarily to weather and other factors on the system that randomly occur and are not under the control of the Company. Incorporating the standard deviation concept into the performance metric accounts for these random impacts. In this context, a trend line that indicates continuous downward performance would be apparent and would reasonably motivate action by the Company and by regulators to examine (and correct for) the drivers of that falling performance. On the flip side, the benefit of a rolling average is that is requires *increasingly* good performance to meet the *increasingly* tough performance standard.

Another approach would be to fix the benchmark at the outset of the PBR Plan (and forgo the rolling average) so that performance in each year of the PBR Plan can be measured against that fixed benchmark during the term of the plan (and beyond). More specifically, using the available historical performance data shown in Testimony of the PBR Metrics Panel, at 15-16, a fixed benchmark could be set using the average of the SAIDI and MBI performance data for 2016-2023, which would then become the comparative point for SAIDI and MBI performance in each year of the PBR Plan. Using this data point as the point of comparison for each year of the PBR Plan would create a more transparent measure of the Company's performance as compared to the historical level. This is the approach that Massachusetts adopted on the premise that there should be *no degradation* of service with the implementation of PBR.

Either approach can work depending upon the underlying proposition serving as the guideline for the implementation of performance metrics.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-016 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Renaud, Paul R., Dickie, Brian J., Coates Jr., Robert S.

Request:

Under the Company's proposed methodology for setting a SAIDI and a MBI performance metric, as detailed in the Testimony of the PBR Metrics Panel, pp. 12-17, our understanding is that the Company could in theory consistently avoid penalties by performing within two standard deviations of the five-year rolling average of the metric, despite actual performance that was worse (more outages) every year than the year before. In this case, the Company would neither incur penalties nor receive credits. Is this correct?

Response:

Please see the response to PUC 1-015.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-017 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: O'Brien, Shamus

Request:

What percentage of Eversource customer complaints have been classified as reversed in the past few years? What are the most usual reasons for customer complaints that are not considered the fault of the utility? Who makes the determination as to whether a customer complaint is reversed? (Ref PBR Metrics Panel, pp. 18-19)

Response:

Results for the number of reversed complaints as a percentage of total complaints made to the NHDOE was ten percent in each of the three years, 2021, 2022 and 2023.

There are various reasons a customer complaint is not considered the fault of the utility. The most frequent may be a "high bill complaint" where the customer believes their bill is higher than it should be. And, after investigating further, the Company reviews the billing, the meter readings and the customer usage to verify the billing is accurate. Other examples include customers falling behind or failing to pay their payment arrangement, customers unhappy with the current rate (which is accurate), or complaints regarding low hanging wires not owned by Eversource. The reasons vary but each complaint is fully researched before determining fault.

The determination as to whether a customer complaint is reversed is made by the Regulatory Relations Specialist who receives the complaint from the NHDOE and who further investigates the complaint. After reviewing the complaint, reaching out to pertinent internal departments for information, and determining the issue at hand, the Regulatory Relations Specialist is able to ascertain when the Company is at fault and propose an appropriate resolution. The Company's findings are then provided to the NHDOE for their review.

Request from: New Hampshire Public Utilities Commission

Witness: Findlay, Amy J., O'Brien, Shamus, Boutin, Warren R., Dickie, Brian J., Renaud, Paul R., Coates Jr., Robert S.

Request:

Ref. Testimony of PBR Metrics Panel. What metrics does Eversource currently use to internally monitor its performance? What is the relationship between these metrics and the proposed performance metrics? Are there any metrics currently tracked by Eversource not being proposed as performance metrics? If so, please identify them, the calculation, and why not?

Response:

Metrics included on the Company's 2024 Internal Scorecard are shown in the table below. These metrics address a wide variety of indictors of operational performance. Some metrics measure performance that directly impacts the customer experience (e.g., reliability, restoration times, outage communication and customer satisfaction). Other metrics are most directly related to employee welfare (e.g. safety metrics). Also, some metrics track progress across the year to ensure consistency with corporate standards and annual limits (e.g., OSHA training, preventive maintenance, and spending). For the purpose of PBR, the Company proposed performance metrics that directly impact customer experience.

Please note that the Company would not reduce its internal targets from one year to the next, absent some major change in operating conditions.

Three metrics—percent of Well-Managed ETRs, percent of Cause Code Availability, and Customer Average Interruption Duration Index ("CAIDI")—were considered for inclusion in the PBR due to their direct relation to customer experience. However, as explained below, based on historical data, these metrics are not sufficiently robust for inclusion in regulatory compliance.

Outage Communication (*% Well-Managed ETRs* and *% Cause Code Availability*)

These metrics were pioneered by Eversource to measure our performance on providing outage information to customers experiencing an outage. Since being introduced, improvement has notably improved, and has steadily remained at a high level in recent years. Only rarely does the Company experience a drop off in performance, and never for longer than a single week. The Company does, however, maintain these metrics on the scorecard to signal immediately if problems arise. In this sense, these metrics are more akin to a car's oil pressure warning light than

a speedometer. Also, because these are Eversource-created metrics, they cannot be benchmarked against peer utilities.

CAIDI (Average Outage Restoration time)

CAIDI remains an important indicator for evaluating individual outages and for internal comparison of customer experience across different regions. In the past, it was considered an important metric for measuring the overall performance of electric utilities, but there has been a shift away from this with the growth of distribution automation. Utilities have discovered that average restoration times can be significantly affected by the management of short-duration interruptions—often in a way that creates a misleading assessment of performance.

The Institute of Electrical and Electronics Engineers Distribution Reliability Working Group ("IEEE DRWG") recently undertook an analysis of CAIDI performance across member utilities. Key among its conclusions is the following:

> *Use of CAIDI for a system level performance target could encourage behavior contrary to providing the best service performance for customers. For example, system CAIDI can be reduced by taking actions that increase the proportion mainline short duration sustained customer interruptions. (For example, delay automated switching long enough to allow a momentary interruption to become a permanent interruption.) While CAIDI is reduced in this example, SAIDI and SAIFI increase because of more sustained interruptions."*[1]

Eversource has found that as investment distribution automation eliminates short-duration sustained interruptions, average restoration times have gone up. The customers who experience an interruption do not see longer restoration times (in fact, it is sometimes shorter). Rather, the average time increases as outages of 5 to 15 minutes in duration are eliminated from the computation.

[1] IEEE Guide for Electric Power Distribution Reliability Indices, 1366-2022

Measure	Meaning/Definition	Proposed PBR Metric?
DART-OSHA Rate	**Days Away/Restricted Time Rate:** The number of injuries per 100 employees that resulted in missed days or placing an employee on restricted duty.	No
PMVA Rate	**Preventible Motor Vehicle Accident Rate:** Number of Preventable Motor Vehicle Accidents per 1 million miles driven.	No
HSIF Actuals - Internal	**High-Energy Serious Injury & Fatality Incidents:** The number of employee injuries or fatalies resulting from an incident that involved high energy (e.g., mechanical, momentum, voltage, temperature, chemical, or pressure).	No
% OSHA Training Completed - Total	The YTD share of training modules completed by employees that relate to OSHA mandated training requirements.	No
% Well-Managed ETRs	The share of outage jobs for which the Estimated Time of Restoration ("ETR") was not updated excessively, and not allowed to expire. (Excessive is defined as more than once for jobs < 3 hours, and twice for jobs 3 hours or longer.)	No
% Jobs with Available Cause Code	The share of outage jobs in which information on the cause of the outage was provided for ETR or restoration messaging to customers.	No
Electric NCC Customer Satisfaction Survey	Refer to Attachment ES-METRICS-1	Yes
MBI	Refer to Attachment ES-METRICS-1	Yes
CAIDI	**Customer Average Interruption Duration Index**: The average restoration time for those customer who experienced an outage.	No
SAIDI	Refer to Attachment ES-METRICS-1	Yes
% Planned Maintenance Completed	The share of annual maintenance and inspection work that has been completed. Year-end target is 100%.	No
NERC Compliance Index	Index that depicts NERC reliability compliance performance based on the number of compliance violations, weighted on risk factors (high, medium, or low).	No
O&M Non Storm ($M)	Spending on Operation and Maintenance of our electrical system (excluding spending on major storm events), as compared with annual target. Also known as "Expense" spending.	No
O&M Storms ($M)	Spending on Operation and Maintenance of our electrical system due to major storm events, as compared with annual target.	No
Capital - Distribution ($M)	Money spent on capital investment in distribution assets--repair, replacement, system extension or enhancement--compared with annual target.	No
Capital - Transmission ($M)	Money spent on capital investment in transmission assets--repair, replacement, system extension or enhancement--compared with annual target.	No
Transmission Capital Placed in Service ($M)	The value of all transmission assets that have been placed into service and energized in the current year--compared with annual target.	No
Overtime-ex. Major Storms ($M)	Spending on overtime labor for expense and capital work (excluding OT labor for major storm events), as compared with annual target.	No
Project Authorization Compliance	The number of jobs requiring supplemental spending authorizations approaching or exceeding the timeframes defined in company financial management policies.	No

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-019 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: O'Brien, Shamus

Request:

A specific metric mentioned in Attachment ES-MK-AR-1 (p. 41) is call center answer time. Did Eversource consider using call center answer times as a metric? Why did it choose not to use this metric?

Response:

The Company continues to emphasize the importance of delivering quality customer experiences in all channels, including through its call centers. Recent trends illustrate that customer preferences are shifting to more satisfying digital channels that allow customers to obtain information and transact in real time at their convenience. Hence, a PBR metric tied to call center answer times would signal a need to prioritize expenditures on a single channel that is less satisfying and offers only limited opportunities for technological enhancements to the customer experience, a signal, which the Company views as inappropriate as it misunderstands resource priorities.

Request from: New Hampshire Public Utilities Commission

Witness: Ros, Augustin, Kolesar, Mark

Request:

Ref. Table 15 of Attachment ES-MK-AR-1. How many performance metrics were adopted as part of PBR for each of the utilities listed? Please provide a list of the specific PBR performance metrics for Alberta, Hawaii, and Massachusetts.

Response:

ALBERTA

Electric distribution utilities subject to the Alberta Utilities Commission PBR Plan (*Decision 27388-D01-2023*) are required to report 27 individual performance metrics in nine categories. All but three of the metrics are set out in *AUC Rule 002: Service Quality and Reliability Performance Monitoring and Reporting for Owners of Electric Distribution Systems and for Gas Distributors.* AUC Rule 002 is provided as Attachment PUC 1-020. The other three metrics are PBR-specific and are prescribed in Decision 27388-D01-2023 at paragraph 412. The performance metrics are set out in Table PUC 1-020(a) below.

TABLE PUC 1-020(a) Alberta Performance Metrics

Category	**Individual Metrics**
Monthly billing and meter reading performance	• Cumulative metered energized sites without actual meter readings provided to parties
Cumulative meters not read within six months, and not read within one year	• Number of sites that have not had their meters read within six months • Number of sites that have not had their meters read within one year.
Work completion performance measures	• Energize request transactions • Time taken (in days, on average for the month) from the date the owner creates an order in its system for the energization, to the date the site is energized

	• End-to-end time taken (in days, on average for the month) from the date of receipt of request to perform the work (from the retailer), to the date the response is sent back to the retailer that the work has been successfully completed • De-energize request transactions • Time taken (in days, on average for the month) from the date the owner creates an order in its system for the de-energization, to the date the site is de-energized • End-to-end time taken (in days, on average for the month) from the date of receipt of request to perform the work (from the retailer), to the date the response is sent back to the retailer that the work has been successfully completed. • Total number of completed de-energizations per month
Worker safety performance measures (as defined by the Canadian Electricity Association ("CEA")	• Lost time injuries • Medical treatment injuries • Fatalities • Exposure hours
Motor vehicle incident frequency	• Annual number of recordable motor vehicle incidents (defined by the CEA) • Annual number of actual kilometres driven by corporate fleet vehicles
Interruption duration and frequency	• System average interruption frequency index ("SAIFI") • with major events included • without major events included • System average interruption duration index ("SAIDI") • with major events included • without major events included
SAIDI of worst-performing circuits on the system	• Identification, for each calendar year, of the worst-performing circuits • SAIDI values for each of the worst-performing circuits • All circuits that were once identified as a worst-performing circuit must be monitored for five years once they are no longer a worst-performing circuit

	• For each circuit that was once a worst-performing circuit, its current SAIDI value and the last calendar year that the circuit appeared in the worst-performing circuit list
Customer satisfaction measures	• Information on survey design o type of survey (e.g., transaction, random) o method of surveying (e.g., telephone, email, web) o issues canvassed o nature of response (e.g., ranking on a scale, yes/no, open-ended) o frequency of survey o number of customers surveyed o response rate • Measure of customer satisfaction to achieve a minimum 75 per cent target • Identification and evaluation of the top three areas for improvement received from customer surveys
PBR – specific metrics	• Controllable O&M per customer • Total cost per customer o Total O&M per customer o Total capital additions per customer

HAWAII

In 2021, the Hawaii Public Utilities Commission approved a portfolio of PBR scorecards and reported metrics, available at https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics. The portfolio includes 11 PBR Scorecard categories and 36 associated metrics. The scorecards and performance metrics are set out in Table PUC 1-020(b) below.

TABLE PUC 1-020(b) Hawaii PBR Scorecards and Metrics

Category	Individual Metrics
Affordability	• Low-to-moderate Income ("LMI") Energy Burden Reported Metric (Percentage of LMI Average Income)

Category	Individual Metrics
	• Payment Arrangement Reported Metric (Percent Payment Arrangement by Customer Class) • Disconnections Reported Metric (Percent Disconnections by Customer Class)
Capital Formation	• Credit Ratings Reported Metric (Credit rating and annual outlook, including directionality) • Third-Party Generation reported Metric (Total MWs of generation and percentage of third-party generation)
Cost Control	• Cost Control for Non-Annual Revenue Adjustment ("ARA") Components Scorecard (Annual sum of recorded revenues for cost recovery mechanisms outside of the PBR formula) • Rate Base per Customer Reported Metric • Operations and maintenance ("O&M") Cost per Customer Reported Metric • Annual Revenue Growth Reported Metric (Total revenue minus revenues for fuel, purchase power and applicable revenue taxes)
Customer Engagement	• Program Participation Scorecard (Number and percent of customers renewable energy, distributed energy resources ("DER") and demand response programs) • Green Button Connect My Data Scorecard (Number and percent of customers participating in an information sharing program for customers with advanced meters) • Green Button Download My Data Scorecard (Number and percent of customers with advanced meters downloading their energy use data) • Time-of-Use ("TOU") Participation Scorecard (Number and percent of customers with advanced meters participating in TOU tariffs) • Advanced Metering Infrastructure ("AMI") Opt-Out Reported Metric (Percentage of customers opting out of advanced meters)
Customer Equity	• Low-to-moderate Income ("LMI") Program Participation Reported Metric (Number of LMI customers participating in each program and percentage of program participants in each program)

Category	Individual Metrics
Distributed Energy Resource ("DER") Asset Effectiveness	• DER Grid Services Capability Reported Metric (Percentage and total MW of DER capable of providing grid services) • DER Grid Services Enrollment Reported Metric (Percentage and total MW of capable DER systems enrolled in grid services programs) • DER Grid Services Utilization Reported Metric (Percentage and total MW of Der systems enrolled in grid services programs that are utilized) • DER Grid Services Utilization Reported Metric (Total MW and MWh of curtailment from DERs, including partial curtailment and power reductions)
Electrification of Transportation	• DER Grid Services Utilization Reported Metric (Total number of company passenger EV miles driven as a percentage of total passenger fleet miles) • Measured Electric Vehicles ("EV") Load (Energy) Scorecard (Measurable energy (kWh) delivered to EV charging stations in approved tariffs by time period (peak, off peak, daytime)) • Measured EV Load (Demand) Scorecard (Average demand (kW) attributable to measured EV charging in approved EV tariffs by hour) • Estimated EV Load Scorecard (Estimated total EV load (kWh)) • EV Count Scorecard (Total number of registered light-duty EVs) • Ride Share Fueling Hubs Reported Metric (Number of shared fueling hubs for Ride Share (e.g. Uber) Only.
Greenhouse Gas ("GHG") Reduction	• Measured EV Load (Energy) Scorecard (GHG emissions in CO2e emissions per year in metric tons, including and excluding biogenic CO2) • GHG Intensity Scorecard (Emissions intensity in CO2e per year in grams/kWh, including and excluding biogenic CO2)
Grid Investment Efficiency	• Avoided transmission and distribution ("T&D") Investment Reported Metric (Total value ($) of deferred and/or avoided T&D capital

Category	Individual Metrics
	investments due directly to the installation or acquisition of non-wires alternatives) • Non-Wires Alternatives ("NWA") Total Cost Reported Metric (Total cost of NWA projects deployed or acquired that defer or avoid T&D capital investment)
Interconnection Experience	• Total DER Interconnection Time Scorecard (Average (mean) total number of calendar days to interconnect DER systems <100 kW in size, in a calendar year. • Truck Roll Response Time Scorecard (Truck roll-related response times for meter change-outs for DER and non-DER customers) • Independent Power Producer ("IPP") Interconnection Reported Metric (Information items for each IPP Project with a Power Purchase Agreement ("PPA") approved by the Commission) • Interconnection Cost Overrun Reported Metric (The percentage of times the actual cost of interconnection has exceeded the estimated cost of interconnection for utility-scale IPP projects with a PPA approved by the Commission)
Resilience	• Critical Load Reported Metric (Total amount of time that critical loads are without power in a year) • National Incident Management System ("NIMS") Certification Reported Metric (Total number and percent of NIMS Incident Command System 100, 200, and 300 certification trainings annually) • Emergency Response Training Reported Metric (Total number and percent of employees that have attended emergency response training annually)

In addition to the portfolio of PBR scorecards and reported metrics, the Hawaii Public Utilities Commission also requires Hawaiian Electric to report on a number of additional key performance metrics, available at https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics/service-reliability. These performance metrics, which have been in place since 2015, include 33 individual performance metrics in eight categories. These performance metrics are set forth in Tables PUC 1-020(c), below.

Table PUC 1-020(c) Hawaii Performance Metrics

Category	Individual Metrics
Service Reliability	• System Average Interruption Duration Index ("SAIDI") • System Average Interruption Frequency Index ("SAIFI") • Customer Average Interruption Duration Index ("CAIDI") • Momentary Average Interruption Frequency Index ("MAIFI") (Momentary interruptions have a frequency of five minutes or less) • Emergency Response Time (Average time to respond to an emergency event)
Power Supply and Generation	• Independent Power Producer ("IPP") Generation (Percent of the total net generation provided by IPPs, both renewable and non-renewable) • Weighted Equivalent Availability Factor ("WEAF") (Percentage of time a fleet of generating units is available to generate electricity) • Weighted Equivalent Forced Outage Rate – Demand ("WEFORd") (Percentage of time a fleet of generating units is in demand but unavailable to operate due to forced outages and forced deratings) • Weighted Equivalent Forced Outage Factor ("WEFOF") (Fraction of an operating period in which a generating unit is not available due to forced outages and forced deratings) • Losses and Unaccounted For Energy (Amount of energy that is lost between entry and egress metering points)
Renewable Energy	• Renewable Portfolio Standard ("RPS") Compliance (Percent of sales represented by renewable energy) • System Renewable Energy ("System RE") (Percent of total net generation represented by renewable energy) • Total Renewable Energy ("Total RE") (System RE plus the contribution from customer-sited renewable generation) • Amount of Renewable Energy Generation Curtailment (Amount of energy that may have been available from renewable energy resources but could not be accepted onto the grid)

Category	Individual Metrics
	• Amount of Renewable Energy Generation Curtailment by Category (Oversupply, System Constraint, Request from a renewable energy generating facility) • Amount of Energy Exported by net energy metering ("NEM") Program Participants (Total amount of energy (kWh) exported to the grid by NEM customers for all rate classes)
Customer Service	• Customer Transaction Survey Results (Customer satisfaction survey results) • "Service Level" (Percentage of Customer Calls Answered Within Thirty Seconds) • Customer Complaints (Number of customer complaints categorized by type, by source) • Billing Accuracy (Average percentage of bills that do not need to be rebilled or reprinted) • Percentage of Meters Read (Percentage of bills produced that use actual meter reads as opposed to estimated reads) • Orders and Appointments (Interval to complete start service orders, stop service orders, and meter re-read orders)
Financial	• Ratemaking Return on Common Equity (Utility ROE) • Credit Ratings (Fitch, Moody's, S&P)
Safety	• Total Case Incident Rate (Number of work-related injuries and illnesses per 100 employees) • Lost Time Rate (Injury or illness that results in an employee being unable to work a full assigned work shift after an incident per 100 employees) • Public Safety Incidents (Injuries allegedly caused by or occur in connection utility operations and service that result in the injured being admitted to hospital or a fatality)
Rates and Revenues	• Cost of Final Delivered Energy to Customers by Rate Class for Each Island System (Average revenue per kWh by rate class) island • Contributing Cost Components to Customer Rates (Cents/kWh for fuel, purchased power, O&M, taxes, return, depreciation, revenue

Category	Individual Metrics
	balancing account rate adjustment, public benefits fund surcharge, other) • Recovery of Fuel & Purchased Energy Costs (Recovery of total fuel costs and total purchased energy costs, exclusive of revenue taxes) • Time of Use Metric (Number of active contracts on TOU rate, per TOU rate schedule, reported separately for EV TOU and non-EV TOU customers)
Emerging Technologies	• Demand Response (Cumulative DR customer load and number of DR Programs • Energy Storage (Energy storage / total amount of power (MW) including IPPs)

Massachusetts

The most recent PBR decision by the Massachusetts Department of Public Utilities ("MDPU") for an electric distribution utility is Fitchburg Gas and Electric Light Company d/b/a Unitil, D.P.U. 23-80 (Electric Division). In that Order, the Department approved 12 individual performance metrics in five categories.[1] Some of the metrics were approved conditionally and the Company was ordered to provide proposals for these metrics at the first annual PBR filing. The performance metrics are for reporting purposes only, there are no associated penalties or incentives. These performance metrics are set out in Table PUC 1-020(d), below:

Table PUC 1-020(d) Massachusetts Performance Metrics in Order D.P.U 23-80

Category	Individual Metrics
Customer Satisfaction and Engagement Metrics	• Customer Satisfaction with Customer Service Metric (Customer satisfaction survey results)
Digital Engagement Metrics	• MyUnitil: enables customers to engage with the Company on line (Number of MyUnitil profiles that are enabled over the course of the PBR term)

[1] The Department did not specify metrics categories in its Order. However, we have put the approved metrics into categories, some of which were proposed by the Company, for ease of comparison with the other metrics provided in this response.

Category	Individual Metrics
	• Self Service Transactions (Number of self-service interactions that are enabled over the course of the PBR term) • Customer Notifications and Alerts: enables customers to enroll in payment notifications, appointment reminders, and a high usage or bill alert (Proposed metrics, baselines and targets to be provided in the 2025 annual PBR adjustment filings) • Mobile Applications: enables customers to engage with the company on a mobile phone (Proposed metrics, baselines and targets to be provided in the 2025 annual PBR adjustment filings) • Outage Notifications (Proposed metrics, baselines and targets to be provided in the 2025 annual PBR adjustment filings)
Affordability	• Low-Income Service Termination Metric (Monthly) regarding low-income customer service terminations)
Peak Demand Reductions Metrics	• Battery Output of Company-owned Storage • Volt-Var Optimization ("VVO") Metric (Peak load reduction resulting from VVO technology at the Company's seven substations, once installed) • Energy Efficiency Metric (Cumulative net summer kW reductions associated with the Company's interventions • Active Demand Response ("ADR") Metric (Peak demand impact of demand response measures implemented by the Company)
Climate Transition and GHG Emissions Reductions	• Annual GHG Emissions Inventory (Monitors progress towards GHG reduction targets and assessed effectiveness of reduction initiatives)

Prior to D.P.U. 23-80, the Department approved a PBR plan for NSTAR Electric Company, d/b/a Eversource Energy in Order D.P.U 22-22. In that Order, the Department approved 18 individual

performance metrics in five categories.[2] The performance metrics are for reporting purposes only, there are no associated penalties or incentives. These performance metrics are set out in Table PUC 1-020(e) below:

Table PUC 1-020(e) Massachusetts Performance Metrics in Order D.P.U 22-22

Category	Individual Metrics
Customer Satisfaction, Customer Engagement, and Operations Metrics	• Overall Customer Satisfaction Metric (Survey conducted by J.D. Power that measures customer satisfaction using six factors: (1) power quality and reliability; (2) price; (3) billing and payment; (4) corporate citizenship; (5) communications; and (6) customer care) • Transactional Customer Satisfaction Index (Measures customer satisfaction associated with: (1) unplanned outages; (2) planned outages; (3) website satisfaction; (4) contact center) • Use of Outage Map Metric (Engagements with the outage map as a percentage of total inbound customer communications during Emergency Response Plan events) • Digital Engagement Metric (Percentage of total customer engagements that are digital) • New Customer Connects Metric (Percentage of new customer connects completed in accordance with Company targets for timeliness of new service connections)
Producer Satisfaction and Producer/Developer Engagement Metrics	• Producer Satisfaction Survey (Measures producer satisfaction associated with: (1) ease of enrollment; (2) ease of connection; (3) timeliness; and (4) helpfulness and communication) • Hosting Capacity Map Usage Metric (Measures the number of visits to the Company's hosting capacity websites for solar developers)

[2] The Department did not specify metrics categories in its Order. However, we have put the approved metrics into categories, some of which were proposed by the Company, for ease of comparison with the other metrics provided in this response.

Category	Individual Metrics
	• Solar Development Timeline Metric (Measure the duration in business days from creation of a solar installation work order to completion)
Peak Demand Reduction Metrics	• Peak Demand Reduction from Energy Efficiency Programs • Peak Demand Reduction from Demand Response Programs • Peak Demand Reduction from Company-owned Storage • Peak Demand Reduction from Company-owned Solar • Peak Demand Reduction from Upgrades to Standard Technologies • Peak Demand Reduction from Volt/Volt-ampere Reactive Optimization
Resiliency Metrics	• MAIFI • SAIDI • SAIFI
Affordability	• Low-Income Terminations Metric (Reports on low-income customer service terminations for nonpayment, accounts with past due balances at levels eligible for disconnect)

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-021 **Page 1 of 2**

Request from: New Hampshire Public Utilities Commission

Witness: Boutin, Warren R.

Request:

Ref. Testimony of PBR Metrics Panel, p. 25, lines 2-4. Eversource proposes establishing targets in 2027 based on measuring data during calendar years 2024 through 2026. What data will the Company collect? Is this data available/retrievable to measure performance in previous years, which would allow for establishing targets earlier? If so, please provide electronic workpapers with formulae and links intact, and if not, why not?

Response:

Tracking accurate data and reporting on interactive timelines of responsible actions between distributed generation ("DG") project interconnection applicants and utilities is made possible by having the right tools and systems in place. PowerClerk, installed for the Company in September 2023, is such a system that enables accurate tracking and reporting of various timelines and analysis of data for discreet steps in the process that have been found to be directly related to customer satisfaction with their utility. Prior to that time, applications were accepted manually, entered manually into non-tracked databases and interactions with applicants handled through emails and phone calls which also were not tracked in a retrievable record. Therefore, it is not possible to collect data prior to 2024 with the same degree of accuracy and reliability necessary to compare those years to future years.

Data proposed to be collected includes:

- Average time and statistical variation for the Company to acknowledge receipt of complete, correct and consistent applications. This data can be measured and sorted by type and size of application using Powerclerk.

- Average time and statistical variation for the Company to issue preliminary approval after submission of a complete consistent and correct application.

- Average time and statistical variation for the Company to install a meter following town approval of a developer-installed system.

- Average time and statistical variation for the Company to issue permission-to-operate following installation of a meter.

- Statistical analysis by the Company of applications submitted by applicants that require corrections.

- Statistical analysis by the Company of applications by type, size and complexity, showing amount of time applications are on hold due to applicant request, applicant action or inaction, or other reasons outside the control of the Company.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-022 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Coates Jr., Robert S., Boutin, Warren R.

Request:

Ref. Testimony of PBR Metrics Panel, p. 26, line 1. What are examples of projects that would be included in the Developments (Residential/Commercial) service type and the Complex Services service type?

Response:

Please see below for the guidelines with examples.

Developments (Residential/Commercial) – Developments for main electric infrastructure, not including individual services.

Examples of Developments include:

- Underground system - new development installing multiple pad mount transformers and primary cables.
- Overhead system – new development installing multiple pole sets and primary and neutral conductors.

Complex Services – Any service requiring an engineering design that is needed to meet customer and system requirements or requiring more than a single span of underground or overhead secondary cable directly between the meter and the transformer.

Examples for Complex Services include:

- Underground system - secondary run from transformer to junction box to customer meter location
- Overhead system - secondary run from transformer pole to service pole to customer meter location.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-023 **Page 1 of 1**

Request from: New Hampshire Public Utilities Commission

Witness: Findlay, Amy J.

Request:

Ref. Testimony of PBR Metrics Panel, p. 30, lines 1-4. What is the significance of the baseline number here? Does it have any impact on the target, or on penalties or credits?

Response:

The 7.5 MW baseline is the average demand reduction per the 2021-2023 Q4 Reports. This will provide historical context for the annual demand reductions to be achieved over the four-year PBR term. Notably, Active Demand Response ("ADR") is a reporting metric in the proposed PBR plan, as described on Bates Page 01923 of the testimony. As ADR is an existing program within the Company's energy efficiency programs, that are subject to an existing performance incentive framework, the Company is not proposing any penalties or credits to be associated with this metric within the PBR. Therefore, this reporting metric is strictly for informational purposes and will have no impact on penalties or credits, either within the PBR plan or in the context of the NHSaves programs. ADR performance incentives will be determined solely by the criteria established in the NHSaves programs.

Public Service Company of New Hampshire d/b/a Eversource Energy
Docket No. DE 24-070

Date Request Received: September 06, 2024 **Date of Response: September 26, 2024**
Data Request No. PUC 1-026 **Page 1 of 2**

Request from: New Hampshire Public Utilities Commission

Witness: Landry, Leanne M., Devereaux, James J.

Request:

Ref. Testimony of L. Landry, J. Devereaux & B. Dickie, Attachments. Please provide electronic workpapers (with formulae and links intact) for any ES-ADDITIONS table presented herein.

Response:

Please refer to Attachments PUC 1-026 (a) through (f). In response to a data request from the Department of Energy, the Company provided updated excel versions of the ES-ADDITIONS attachments with a column containing Bates page references related to each project's relevant documentation. For ease of review, the Company is submitting the narrative submitted in response to that data request in this response, along with the Bates referenced excel workpapers.

The Company provided project documentation associated with the Company's historical capital additions from the time of the last step increase in 2022 through December 31, 2023 along with supporting documentation for capital additions associated with new business projects and other capital since the Company's last rate case, that have been placed in service but not included in the Company's three step adjustments for plant in service related to 2019, 2020, and 2021. To facilitate this review, the Company provided a chronological list of projects, programs, annuals, carryover projects, and variance analysis for 2019 through 2023 plant in service submitted in Attachments ES-ADDITIONS 2(a) through 2(f).

The project documentation associated with each project in Attachment ES-ADDITIONS-2 is provided in Attachment ES-ADDITIONS-3, for the corresponding year, and explained further below.

Where it may seem as if project documentation is provided more than once as if a particular project is a carryover project and appears with plant in service in more than one year. For example, a carryover project in 2023 may appear as a specific project in 2022, but the Company provided the documentation for the project in both years. That does not mean the documentation is necessarily redundant, as the capital spend in 2022 is likely different in 2023. Therefore, the Company is providing the necessary documentation for both years. It is also possible that a project could appear as a carryover project in multiple years. Please refer to Attachment ES-ADDITIONS-2(e), tab "2022 – Carryover", Line 1 Millyard SS Replacement, Project No. A17S03 with plant in service

dollars of $11, 241, 762, and please refer to Attachment ES-ADDITIONS-2(f), tab "2023 Carryover", Line 3 Millyard SS Replacement, Project No. A17S03 with plant in service dollars of $1,140,972. This is an example of the same project appearing in two different years and the Company provided the documentation in each corresponding documentation attachment for a complete, comprehensive package.

Separately, the Department of Energy staff emailed the Company on July 3, 2024 requesting an index for each project number referenced in the Testimony of Leanne M. Landry, James J. Devereaux, and Brian Dickie and Attachments along with the associated bates pages to facilitate locating the supporting information for each project. The Company provided a response to this emailed request on July 12, 2024. The Company also provided an index to the associated Bates pages in the attachments provided in the July 12th email. Attached are the Bates indexed attachments as follows:

- Attachment PUC 1-026(a) – ES-ADDITIONS-2(a) with bates reference
- Attachment PUC 1-026(b) – ES-ADDITIONS-2(b) with bates reference
- Attachment PUC 1-026(c) – ES-ADDITIONS-2(c) with bates reference
- Attachment PUC 1-026(d) – ES-ADDITIONS-2(d) with bates reference
- Attachment PUC 1-026(e) – ES-ADDITIONS-2(e) with bates reference
- Attachment PUC 1-026(f) – ES-ADDITIONS-2(f) with bates reference