

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DE 24-070**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
d/b/a EVERSOURCE ENERGY**

**Request for Change in Distribution Rates**

**Procedural Order Re: Record Requests**

The Commission requests that Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource or Company) respond to the following record requests on or before the close of business on September 26, 2024. The Company is also requested to indicate the name(s) of the personnel preparing each response, with their capability of attesting to their responses at Commission proceedings:

**Record Requests Related to the Performance Based Rate Proposal**

Record Request 1

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

Record Request 2

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

Record Request 3

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)

Record Request 4

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?

#### Record Request 5

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)

#### Record Request 6

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)

#### Record Request 7

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)

#### Record Request 8

Reference Foley et al, p. 60-61. Please re-state/clarify how the grid enhancements “not currently contemplated in the Company’s 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?

#### Record Request 9

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?

#### Record Request 10

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

#### Record Request 11

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

Record Request 12

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.”

Record Request 13

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.

Record Request 14

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?

Record Request 15

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?

Record Request 16

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?

Record Request 17

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)

Record Request 18

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?

Record Request 19

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?

Record Request 20

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.

Record Request 21

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?

Record Request 22

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?

Record Request 23

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?

**Record Requests Related to Company Capital Expenditures**

Record Request 24

Ref. Testimony of D. Foley, R. Coates & D. Horton, pp. 16-17. Please provide an electronic workpapers table (with formulae and links intact) identifying each capital expenditure (capex) project of \$250,000 or greater in the last 5 years, grouped as per Figure 4 (p. 27), 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.

#### Record Request 25

Ref. Testimony of D. Foley, R. Coates & D. Horton, pp. 25-27, 60-61. Please provide an electronic workpapers table (with formulae and links intact) identifying each proposed future capital expenditure (capex) project for 2025-2029 as grouped in Figure 4 (p. 27), related FERC account number, related Company Accounting Manual account number, budgeted installed cost, how it is expected to be financed, depreciable life & depreciation method (for ratemaking and tax purposes).

#### Record Request 26

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.

#### Record Request 27

Ref. Testimony of L. Landry, J. Devereaux & B. Dickie, p. 24, lines 6-13. Please provide an electronic workpapers table (with formulae and links intact) identifying each proposed future capital expenditure (capex) project for 2025-2029 as grouped in this response, related FERC account number, related Company Accounting Manual account number, project start and end dates, budgeted installed cost, how it is expected to be financed, depreciable life & depreciation method (for ratemaking and tax purposes).

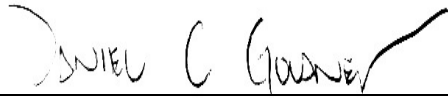
#### Record Request 28

Ref. Testimony of L. Landry, J. Devereaux & B. Dickie, pp. 24, lines 16-22 and p. 25, lines 3-5. Please provide an electronic workpapers table (with formulae and links intact) identifying each proposed future capital expenditure (capex) project for 2025-2029 as grouped in this response, related FERC account number, related Company Accounting Manual account number, project start and end dates, budgeted installed cost, how it is expected to be financed, depreciable life & depreciation method (for ratemaking and tax purposes).

#### Record Request 29

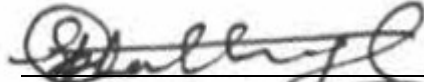
Ref. Testimony of L. Landry, J. Devereaux & B. Dickie, pp. 28, Table 1. Please provide this table in electronic workpapers format (with formulae and links intact) which rolls up from workpapers requested above for each proposed future capital expenditure (capex) project for 2025-2029 as grouped in Table 1 and sub-grouped per descriptions on pp. 28-31, related FERC account number, related Company Accounting Manual account number, project start and end dates, budgeted installed cost, how it is expected to be financed, depreciable life & depreciation method (for ratemaking and tax purposes).

So ordered, this sixth day of September, 2024.



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Daniel C. Goldner  
Chairman



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Pradip K. Chattopadhyay  
Commissioner

# Service List - Docket Related

Docket#: 24-070

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Email Addresses

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ClerksOffice@puc.nh.gov  
Marie-Helene.B.Bailinson@energy.nh.gov  
Clifton.Below@CommunityPowerNH.gov  
rborowski@preti.com  
rburke@nhla.org  
brian.callnan@communitypowernh.gov  
jessica.chiavara@eversource.com  
mtclark@CAEnergy.com  
Michael.J.Crouse@oca.nh.gov  
nacrowley@CAEnergy.com  
wdejeanlouis@synapse-energy.com  
Deana.Dennis@CommunityPowerNH.gov  
Energy-Litigation@energy.nh.gov  
jjdevirgilio@gmail.com  
paul.b.dexter@energy.nh.gov  
jay.e.dudley@energy.nh.gov  
Stephen.R.Eckberg@energy.nh.gov  
joshua.w.elliott@energy.nh.gov  
sam@cleanenergynh.org  
Matthew.J.Fossum@oca.nh.gov  
sandra.gagnon@eversource.com  
aglaserschoff@synapse-energy.com  
jgoldberg@keeganwerlin.com  
golding@communitychoicepartners.com  
tgriset@preti.com  
dghansen@CAEnergy.com  
bhavumaki@synapse-energy.com  
mhershberg@keeganwerlin.com  
mhorne@hcc-law.com  
tklaes@blueridgecs.com  
nkrakoff@clf.org  
donald.m.kreis@oca.nh.gov  
Matt.LHeureux@unh.edu  
alexandra.k.ladwig@energy.nh.gov  
Molly.M.Lynch@energy.nh.gov  
karen.j.moran@energy.nh.gov  
dmullinax@blueridgecs.com

smurphy@mpm.com  
nhregulatory@eversource.com  
elizabeth.r.nixon@energy.nh.gov  
amanda.o.noonan@energy.nh.gov  
ocalitigation@oca.nh.gov  
cpalmer@synapse-energy.com  
eperkins@competitive-energy.com  
aaron@rothschildfinancial.com  
srowe@hancocklumber.com  
noel.rutherford@na.crh.com  
mary.e.schwarzer@energy.nh.gov  
chris@cleanenergynh.org  
dsoutter@necta.info  
mark.p.toscano@energy.nh.gov  
stower@nhla.org  
jacqueline.m.trottier@energy.nh.gov  
Charles.J.Underhill@oca.nh.gov  
jvanrossum@clf.org  
Marc.H.Vatter@oca.nh.gov  
willoughbyconsulting@gmail.com  
twoolf@synapse-energy.com  
Matthew.C.Young@energy.nh.gov