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December 14, 2023

**Via Electronic Mail Only**

New Hampshire Department of Energy  
Molly M. Lynch, Esq.  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

RE: **CPT 2023-002**, Complaint of Community Power Coalition of New Hampshire against Public Service Company of New Hampshire d/b/a Eversource Energy  
Eversource follow up answer to Section 6.1 of CPCNH complaint

Attorney Lynch:

On October 30, 2023 you, on behalf of the New Hampshire Department of Energy (“DOE” or “Department”) contacted Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) seeking a follow-up response to the answer the Company provided to Section 6.1 of the complaint filed by the Community Power Coalition of New Hampshire (“CPCNH” or the “Coalition”) against Eversource. The Department requested a response by November 17, 2023. I did not receive the Department’s original communication and so I was unaware of the request and a response was not provided. When you followed up with me on November 27, we agreed that Eversource would provide the Department with the follow-up response it was seeking by December 15, 2023. This serves as that response.

Specifically, the DOE found the Company’s answer that “[t]here is nothing that prohibits requiring enrollments or drops be submitted more than two days in advance of the customer’s meter read date” to be inadequate because the answer “did not provide the language from the EDI Working Group Report that it references in its Response. Nor does the response consider whether Eversource’s requirement that the EDI be received by 3:00 pm with a minimum of three (3) business days prior to the customer’s next cycle read date is compliant with Eversource’s Tariff No. 10 Original p. 36 §3(a) or Puc 2004.10(a).” The Company apologizes for any lack of clarity and offers the following to further support its position.

As a first matter, it would be helpful to clarify the context and force and effect of the highlighted text in the Coalition’s complaint. This text comes from a competitive supplier orientation training presentation, and it does not represent a more stringent policy of the Company. Rather is presented as guidance and added information for suppliers regarding the two business-day deadline for enrollments to help suppliers ensure that they get their enrollments/drops in before the two-day cutoff. To be able to process enrollments, the Company needs the full two business days, but the deadline on that second day is not the end of the calendar day (11:59 p.m.), it is when the Company runs its “batch” for its billing systems. The batch is typically run sometime in the

afternoon. Because this second day is not a full calendar day, the training presentation encourages suppliers to submit any enrollments/drops on the *third* business day before the meter read, because that way, no matter when on that day the supplier submits the enrollment/drop, it is sure to be included in the batch on the second business day before the meter read.

The idea behind the training that the highlighted slide in the CPCNH complaint is from is to provide suppliers with as much insight into the process as possible and provide recommendations that will ensure their enrollments/drops are included in the upcoming meter read cycle. The training *does not* implement a more robust standard of three days: enrollments/drops received by Eversource on the second business day before the meter read will be processed, so long as they are received prior to the batch being run on that day, consistent with the Company tariff and Puc 2004.10(a). The training slide is simply a *recommendation and encourages* suppliers to submit enrollments three days before the meter read, stating that doing so will guarantee that the enrollment is included in the batch on the following day. Otherwise, should a supplier “run out the clock” on the second day, they could lose the enrollment for the entire next meter cycle if they submit the enrollment after the batch on the second day before the meter read date. But to be clear, the Company’s policy is that which is represented in the tariff and echoed in Puc 2004.10(a).

To close the loop on the reference to the EDI Working Group Report that sets a minimum threshold of “no less than two (2) business days”, that reference appears on page 15.<sup>1</sup> This designates two days as the *least* amount of time prior to a customer’s meter read cycle that a supplier or aggregator can file any enrollments or drops. But setting a minimum of time for enrollments/drops prior to a meter cycle does not by definition inherently prohibit a utility from instituting a policy of *more* than two days, it just cannot have a one-day or same-day policy. But this is a moot point in this instance, because as explained above, the Company *does* process enrollments/drops through the second day before the meter read date. The only qualifier is that the second day before the meter read cycle only lasts until the batch is run in the afternoon on that day, and not until the end of the calendar day. To avoid confusion on the part of suppliers and missed enrollments/drops received too late on that second day, the Company encourages suppliers to avoid the timing issue on the second day by submitting enrollments/drops three business days before the meter read.

The Company appreciates the Department’s consideration of this supplemental answer and hopes that it provides greater clarification surrounding Eversource’s EDI enrollment policy. This answer is only being submitted electronically, consistent with the Department’s direction; paper copies will not follow.

Thank you,



Jessica A. Chiavara  
Senior Counsel, Eversource Energy

cc: Clifton Below, Chair CPCNH  
Don Kreis, Office of the Consumer Advocate

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<sup>1</sup> <https://www.puc.nh.gov/electric/EDI/edirev53.pdf>