

STATE OF NEW HAMPSHIRE

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DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

October 30, 2023

Jessica A. Chiavara
Senior Counsel
Eversource Energy
780 N Commercial Street
Manchester, NH 03101

Re: CPT 2023-002, Complaint of Community Power Coalition of New Hampshire against Public Service Company of New Hampshire d/b/a Eversource Energy; New Hampshire Department of Energy Letter to Eversource Energy

Dear Attorney Chiavara:

On July 24, 2023, the Department of Energy (DOE or Department) received your response to the formal complaint of Community Power Coalition of New Hampshire (CPCNH or Complainant) against Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), filed on June 13, 2023 and docketed as CPT 2023-002 (Complaint). The DOE appreciates your response and is continuing its review of this Complaint. In order to further its investigation, the Department requests that you provide an additional response.

At Section 6.1 of the Complaint, CPCNH alleges that Eversource is requiring EDI enrollment (or drop) be submitted no later than 3 pm a minimum of three (3) business days prior to the next scheduled meter read date. In your response you provided the following response:

“The EDI standards in the EDI Working Group Report set a minimum notice requirement (not less than two days). There is nothing that prohibits requiring enrollments or drops be submitted more than two days in advance of the customer’s meter read date.”

The Department finds this response inadequate. Eversource 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)¹ or Puc 2004.10(a).²

Please provide a detailed response to Section 6.1 specifically considering Eversource's Tariff No. 10 Original p. 36 §3(a) and Puc 2004.10(a). Please include references and/or attachments of any documents Eversource is relying on in its answer. If you seek confidential treatment of the response or any documents, please mark that material as confidential. Please provide this response by **November 17, 2023** and be sure to send copies to the Complainant and the Office of the Consumer Advocate.

The DOE has waived the filing of paper copies in this matter and this letter is being sent electronically only.

Sincerely,

/s/ Molly M. Lynch

Molly M. Lynch
Staff Attorney/Hearings Examiner
Department of Energy

cc (electronically only): Clifton Below; and Office of Consumer Advocate.

¹ Eversource's Tariff No. 10 Original p. 36 §3(a) states, "Supplier Service shall commence on the date of the Customer's next meter read date, provided that the Supplier has submitted the Electronic Enrollment to the Customer at least two business days prior to the scheduled meter read date."

² New Hampshire Rule Puc 2004.10(a) provides, "When a CEPS enrolls a new customer, the enrollment shall be effective for the customer's scheduled meter read date that follows EDI notification to the utility by the CEPS, provided that EDI notification occurs no less than 2 business days before the customer's scheduled meter read date. Otherwise, the enrollment shall be effective for the customer's next meter read date."