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Witness: Edward A. Davis and Kimberly R. Parsons
Request from: UCONN

Question:

(Rate Design & Tariff Structure) In Massachusetts Department of Public Utilities Docket No. 22-22, Eversource's most recent distribution rate case for its Massachusetts service territory, Eversource was ordered to offer a voluntary, opt-in rate option to its large commercial customers in Eastern Massachusetts that incorporates a coincident peak rate design for transmission charges. Under this rate design, participating customers are assessed a monthly transmission demand charge based on a customer's average 60-minute grid demand (in kW) measured during Eversource's monthly peak load hour measured in aggregate for the purposes of ISO New England regional network service cost allocation.

a. Please explain why Eversource did not include a similar coincident peak rate design option for its large commercial customers in Connecticut as part of its rate design proposal.
b. Please explain whether Eversource plans to implement a coincident peak transmission rate pilot for large customers in the Company's New Hampshire service territory.
c. Is Eversource aware of other electric utilities in New England that currently offer a coincident peak transmission rate option for large commercial customers?
d. Does Eversource have the administrative and technical infrastructure in place to offer a voluntary coincident peak transmission rate option for its large commercial customers in Connecticut? If not, please identify (i) each required system modification and its estimated cost, and (ii) any other administrative or technical obstacles to offering a voluntary coincident peak transmission rate.

Response:

a. The Company's purpose and focus in this application is distribution rates.

b. Yes. This type of rate exists in other jurisdictions that have made a policy decision that the inequities inherent in this type of rate for residential and small or medium commercial and industrial customers are outweighed by other policy factors, including Massachusetts.

c. Such an option is not proposed. The requirements, capabilities, need for modifications, costs, obstacles for development and implementation of such a rate, and other considerations that potentially would need to be addressed have not been evaluated.

d. Yes, the Company is aware that its affiliate, NSTAR Electric Company in Massachusetts has such a rate, as well as one or two other companies in New England.

e. Based on Eversource's experience with this rate, the Company views this type of rate as inherently inequitable for other customer segments, including residential customers. The basic premise of the rate is to allow the rate-taker to avoid cost responsibility. This type of rate inherently favors more sophisticated customers, while imposing burden on other smaller customers. Therefore, the Company is not supportive of this type of rate design.