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Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 17-171
Public Service Company of New Hampshire d/b/a Eversource Energy
Proposed Tariff Amendment Reinstating Late Payment Charge

Dear Director Howland:

Consistent with RSA 378:3 and PART Puc 1605 relating to service or tariff changes other than a full rate case, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) herein proposes to amend the terms of its tariff relating to the assessment of late payment charges as described in the Terms and Conditions, Second Revised Page 23 of Eversource’s tariff, NHPUC No. 9. Specifically, Eversource is seeking approval to transition back to the tariff language that had been in place for many years prior to late-2017 in light of the improvements in payment processing that have been observed. Consistent with Puc 1605.02, enclosed with this cover letter and summary are annotated and clean tariff pages showing the proposed changes, and a supporting technical statement. Eversource proposes that the initial changes become effective on February 1, 2019.

In 2017, Eversource customers had experienced delays in the posting of their mailed payments. As described in Eversource’s November 1, 2017 submission in Docket No. DE 17-171, according to information gathered by the Company, the average time for mailed payments to reach Eversource’s payment processing site in Dallas, Texas and be posted to customer accounts had increased due primarily to changes made by the United States Postal Service (“USPS”). The result was that there was an increase in the number of customers being assessed late payment charges, though they had timely mailed their payments. To address this issue, Eversource had taken steps to improve the timeliness of payment processing, and ultimately made a proposal to amend the terms and conditions of its tariff to extend the timetable for assessing late payment charges. More specifically, that amendment was proposed to shift the date for the imposition of a late payment charge from the day after the due date to five business days later, to provide additional time for payments to arrive and be processed. Initially, in Order No. 26,081 (December 1, 2017) the Commission approved the Company’s request. The Commission also determined that it would hold a hearing on the matter to address the problem and more long-term solutions.

Following a hearing on January 17, 2018, at which the Company discussed a number of potential and pending long-term solutions, including its impending transition to a new payment processing vendor located in New England, the Commission issued Order No. 26,110 (March 7, 2018). In that Order, the Commission concluded that “At this time, we find that it is appropriate and in the public interest to require Eversource to waive the assessment of late payment charges on any payment sent by mail.” Order No. 26,110 at 7. Further, the Commission stated that:

This waiver shall be in effect until further order of the Commission. We direct Eversource to keep the Consumer Services and External Affairs Division informed of its progress in transitioning to the new payment processing vendor. Eversource shall have the burden of demonstrating that there are no mail delays to the selected vendor that result in the application of late payment charges, and that the new vendor posts payments to customer accounts without delay.

Order No. 26,110 at 8. Since that time, Eversource has undertaken the manual process of identifying all late payments made by mail and waiving any late payment charges for those customers. Further, Eversource has reported regularly to the Commission’s Consumer Services and External Affairs Division on the status of late payments, the transition to the new payment processing vendor, and the improvements in mail processing that have come from the transition. Given the successful transition to the new payment processing vendor, and the corresponding improvements in payment posting as described in the accompanying technical statement, Eversource submits this request to reinstate late payment charges by revising its tariff back to the language in place prior to the issuance of Order No. 26,081 on December 1, 2017, in two-stages.

As described further in the attached technical statement, Eversource successfully transferred its payment processing to Century Bank based in Boston, Massachusetts in mid-2018. Having its new payment vendor in Massachusetts not only means that the payments are processed closer to the place from which they are mailed, but it also avoids the area of the country most negatively affected by the changes at the USPS. Since the time of the transfer, Eversource has noted an efficient delivery and posting of customer payments and it has apprised the Commission’s Staff of the improvements.

To assist in demonstrating that the payment processing issues had been adequately addressed, the Company worked with Century Bank to conduct a study of the mailed payments and the payment posting processes. The results of that study were shared with the Commission Staff and OCA and are included in the slide presentation accompanying this filing. As shown in that study, mailed payments are being received and processed promptly and Eversource is confident that the delays that impacted customers in 2017 will not reoccur.

Accordingly, and for the reasons described in the technical statement, Eversource requests that the Commission approve the change to Eversource’s tariff to reinstitute late payment charges. Eversource proposes that the late payment charges be reinstated in a two-step process, similar to the manner in which they were waived initially. The first step would involve ending the manual process of waiving late payment charges for payments made by mail, and the

second involves returning to the original timetable for the imposition of a late payment charge that was in effect prior to Order No. 26,081.

Thank you for your assistance with this matter. If you have any questions about this matter, please do not hesitate to contact me.

Very truly yours,



Matthew J. Fossum
Senior Counsel

Enclosures

CC: Service List