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January 14, 2022

Mark D. Marini, Secretary Department of Public Utilities One South Station, 5th Floor Boston, MA 02110

Re: NSTAR Electric Company d/b/a Eversource Energy, Petition for Approval of an Increase in Base Distribution Rates and a Performance-Based Regulatory Plan - D.P.U. 22-22

Dear Mr. Marini:

Enclosed are an original and five (5) copies of a request for approval of a performance-based ratemaking ("PBR") plan, a general increase in distribution rates and related proposals by NSTAR Electric Company d/b/a Eversource Energy ("Eversource" or "NSTAR Electric" or the "Company"), made in accordance with G.L. c. 164, § 94 and 220 C.M.R. §§ 5.00 *et seq.*¹ A check in the amount of \$2,300 for the filing fee is included herewith.

The Company is making this filing because it is at the end of a five-year PBR Plan approved in NSTAR Electric Company and Western Massachusetts Electric Company each d/b/a Eversource Energy, D.P.U. 17-05 (2017), which expires as of December 31, 2022. The testimony and exhibits submitted today by the Company show that customers have benefitted greatly from the first term of the PBR Plan. These benefits include incentivizing strict control over operating expense so that operating expenses were held level, while enabling investment in electric distribution infrastructure to reinforce and improve the reliability and resiliency of the distribution system. The Company has also performed well on a series of performance metrics measuring key outcomes sought by Commonwealth energy policy. Lastly, customers have experienced rate stability associated with smaller sequential changes occurring annually, rather than experiencing more significant impacts occurring every two to three years due to sequential base-rate proceedings, which are avoided with the implementation of PBR.

The Company is requesting an increase in rates designed to address an \$89 million revenue deficiency. This revenue deficiency is primarily related to investments in enterprise information technology systems, storm cost recovery and vegetation management costs, all of which are important initiatives for customers.

If the Department were to approve the Company's proposals without modification, the typical residential non-heating customer would experience a total annual bill impact of 5.2 to 5.4 percent, which equates to an average monthly increase of \$7.14 to \$7.29. For commercial and industrial customers, the average impact would range from a decrease of 3.7 percent to an increase of 7.8 percent, depending on the respective rate class.

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The Department last approved a general distribution rate increase for the Company in D.P.U. 17-05 (2017).

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Lastly, consistent with the provisions of G.L. c. 164 § 94 and 220 C.M.R. 5.02(4)(a), the enclosed proposed tariffs bear an effective date of February 1, 2022, which is the first day of the month following the Company's filing and at least fourteen days after the Company's filing. Consistent with the requirements of G.L. c. 164, § 94, the Company anticipates that the Department will suspend the proposed tariffs for a period of ten months and issue its final decision on or about November 30, 2022, for rates effective January 1, 2023.

Eversource is appreciative of the work that all parties will put into this docket and looks forward to working with the Department and interested parties throughout the proceeding. All correspondence relating to the filing should be addressed to:

Cheryl M. Kimball, Esq. Ashley N. Botelho

Danielle C. Winter, Esq.

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Please acknowledge receipt of this filing by date-stamping the enclosed copy of this letter and returning it in the envelope provided. Thank you for your attention to this matter.

Very truly yours,

COSpille

Cheryl M. Kimball, Esq.

Enclosures

cc: Hon. Matthew Nelson, Chair (cover letter only)

Hon. Robert Hayden, Commissioner (cover letter only)

Hon. Cecile Fraser, Commissioner (cover letter only)

Jonathan Goldberg, General Counsel

Emily Luksha, Director, Rates and Revenue Requirements

Chris Chan, Director, Electric Power Division

Marc Tassone, Hearing Officer

Nathan Forster, Assistant Attorney General

Joseph W. Rogers, Assistant Attorney General

Rachel Evans, Department of Energy Resources