

STATE OF NEW HAMPSHIRE

17-PLC 01DC18-#814

CONSUMER ADVOCATE  
D. Maurice Kreis

ASSISTANT CONSUMER ADVOCATE  
Pradip K. Chattopadhyay



TDD Access: Relay NH  
1-800-735-2964

Tel. (603) 271-1172

Website:  
[www.oca.nh.gov](http://www.oca.nh.gov)

OFFICE OF CONSUMER ADVOCATE

21 S. Fruit St., Suite 18  
Concord, NH 03301-2441

October 31, 2018

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

Re: Docket No. DE 17-136  
Electric and Natural Gas Utilities  
2018-2020 Energy Efficiency Resource Standard Implementation Plan

Dear Ms. Howland:

Enclosed for filing in connection with the above-captioned matter is an original and six copies of the Office of Consumer Advocate's Second Motion to Compel Data Responses. Please note that two documents are separately appended to the motion.

As the Commission is aware, this docket in its present posture is moving forward according to an abbreviated schedule -- from a September 14 utility filing to hearings scheduled to commence on December 11. The Office of the Consumer Advocate (OCA) agreed to this ambitious schedule based in part on the assumption that the parties, including the subject utilities, would cooperate in good faith with respect to preparing for those hearings.

That assumption is no longer valid and thus it has become necessary for the OCA to file not one but two discovery motions. In these circumstances, we reserve the right to move for leave to file supplemental direct testimony (our initial direct testimony being due in two days) and/or to postpone the hearings. Although we realize that the chief purpose of the schedule in its present form is to allow the Commission to issue a final order prior to January 1, we believe that steps can be taken to assure program continuity should it become necessary for reasons of due process to defer the hearings and subsequent order into 2019.

Please feel free to contact me should there be any concerns or questions about the foregoing.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Kreis", written in a cursive style.

D. Maurice Kreis  
Consumer Advocate

Encl.

cc: Service List