

**THE STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

**PETITION FOR RECOVERY OF STORM EXPENSES**

MOTION FOR WAIVER OF PUC 203.02

Docket No. DE 18-XXX

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or “Company”) hereby requests, pursuant to New Hampshire Code of Administrative Rules Puc 201.05, that the Commission waive certain requirements of Puc 203.02, relative to filing requirements in adjudicative proceedings. In support of this filing, Eversource says the following:

1. On April 5, 2018, Eversource submitted a petition for recovery certain storm related expenses from its Major Storm Cost Reserve. That filing contains two groups of storm costs: those relating to costs incurred between 2011 and early 2013 which have been audited by the Commission’s Audit Staff, and those costs incurred between late 2013 and early 2016 which have not yet been audited.

2. To assist in the auditing of costs, Eversource provided, on a number of CDs, copies of invoices and other materials that would be required for the Commission’s Audit Staff to complete its review. The materials provided, if printed, would be more than 8,000 pages long. Rather than print such voluminous material unnecessarily, Eversource hereby requests that the Commission waive the requirements of Puc 203.02 requiring and original and 6 copies of the filed materials.

3. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

4. In that this matter has just been submitted, granting the requested waiver will not disrupt the orderly and efficient resolution of the matter. Furthermore, in general, the review of materials by the Commission's Audit Staff occurs outside the framework of an adjudicated case and is undertaken by the electronic exchange of information, rather than through exchange of printed materials. In this case, Eversource was attempting to make the review by the Audit Staff more efficient by providing the information upfront, and in a format that would be useful. Providing 56,000 pages of printed material will be more likely to create delay than to improve the efficient processing of the matter.

5. Additionally, Eversource submits that waiver serves the public interest because compliance with the applicable rule in this case would be onerous and unnecessary. As noted, compliance with the rule would require printing more than 56,000 pages and would not enhance the processing of the docket. In this case, the purpose of the rule is served by providing electronic copies of the material to the persons who most need it, the Commission's Audit Staff. For other persons, copies of the petition and testimony have been provided consistent with the Commission's rule. Thus, it is only the materials for the Audit Staff that would not be provided in printed form. Accordingly, Eversource requests that the Commission waive the requirement

to provide an original and 6 copies of the attachments to Eversource's Petition to Recover Storm Costs.

WHEREFORE, Eversource respectfully requests that the Commission grant a waiver of Puc 203.02 as described above, and order such further relief as may be just and equitable.

Respectfully submitted,

**Public Service Company of New Hampshire d/b/a  
Eversource Energy**

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