

STATE OF NEW HAMPSHIRE

NHPLC 21DCT18-0814

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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That assumption is no longer valid and thus it has become necessary for the OCA to file not one but two discovery motions.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