

STATE OF NEW HAMPSHIRE

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July 31, 2019

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 19-057
Public Service Company of New Hampshire d/b/a Eversource Energy
Distribution Service Rate Case

Dear Ms. Howland:

Please treat this letter as the response of the Office of the Consumer Advocate (OCA) to the communication filed earlier today in the above-referenced proceeding by Public Service Company of New Hampshire (PSNH). In its letter, PSNH states that it is "amenable" to removing from consideration in the instant rate case two capital projects for which PSNH is seeking pre-approval. PSNH indicates that it is willing to resubmit the two projects for pre-approval in separate dockets.

The OCA is already on record as asserting that neither of these projects is an appropriate subject for review in the pending rate case. Construction has not commenced for either project and RSA 378:30-a precludes their inclusion in rate base until the construction work is completed. Moreover, nothing in the applicable statutes or rules precludes PSNH from moving forward with the projects absent pre-approval; indeed, such advance authorization is arguably incompatible with the longstanding paradigm of after-the-fact prudence review.

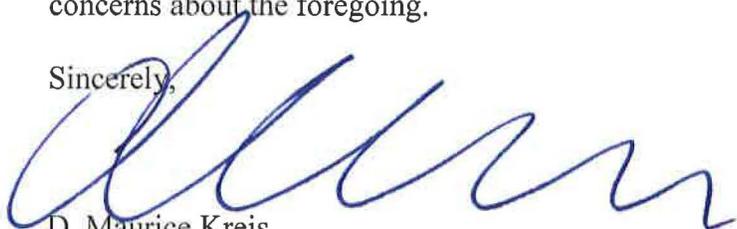
In its letter, PSNH notes that it sought the concurrence of other parties prior to filing the communication. We declined to provide our concurrence because we could not agree with PSNH that the separate proceedings should occur in an "expeditious and efficient manner such that those dockets may be concluded without undue delay and preferably near in time to the conclusion of the rate case."

As a likely participant in the two proceedings PSNH has agreed to initiate, we will of course not seek to delay, for the sake of delay, the Commission's review of the projects. Our experience in similar dockets with other utilities suggests that when delays occur, it is generally because the

subject utility is experiencing difficulties with developing and providing necessary information. In these circumstances, while we would not intentionally or knowingly seek to delay the progress of a proceeding without good cause, we cannot agree to any particular timeline – even in general terms. We acknowledge and do not expect to thwart PSNH’s business interest in moving forward as expeditiously as it can, but there is no fire. And, again, nothing prevents PSNH from moving forward with the two projects on any timeline it prefers.

Thank you for considering our views. Please feel free to contact me if there are any questions or concerns about the foregoing.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Maurice Kreis". The signature is fluid and cursive, with a large initial "D" and "M".

D. Maurice Kreis
Consumer Advocate