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DEPARTMENT OF ENERGY  
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Daniel C. Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street  
Concord, NH 03301

August 8, 2023

Re: DE 23-063 Public Service Company of New Hampshire d/b/a Eversource Energy, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty and Until Energy Systems, Inc. – Joint Utilities' Petition for Waiver of Certain Provisions of the Puc 2200 Rules – DOE Preliminary Position

Dear Chairman Goldner:

On July 24, 2023, the Public Utilities Commission (Commission) issued a procedural order in the above captioned docket requiring the Department of Energy (Department) to file its position regarding the Joint Utilities' petition, including the reasons for this position, on or before August 9, 2023.

At this time, the Department takes no position regarding the request for waiver of Puc 2205.16(d)(1) and the request to authorize a reconciling rate mechanism or deferred accounting treatment. Regarding the request to require that Community Power Aggregators utilizing bill-ready billing comply with Puc 1203.06(b), if the Commission determines the cost of implementing bill-ready billing to be reasonable and directs the utilities to undertake the necessary billing system changes, it is the Department's position that suppliers should be required to provide the utility with all information necessary for compliance with Puc 1203.06(b). Additionally, should the Commission interpret the provisions of Puc 2204.02(a)(2) and Puc 2205.13(a)(7) to require the provision of export data, the Department does not oppose a temporary waiver of these provisions for Eversource only, and for the three-month period beginning June 14, 2023 to September 14, 2023, as indicated in the Joint Utilities' petition. See *Joint Utilities Petition for Waiver of Certain Provisions of the Puc 2200 Rules*, at Bates page 11, paragraph 14.

The Department has reviewed the filing and looks forward to working with the companies to address relevant questions and clarify the factual context for the record. Based on the Department's experience in another recent docket related to establishing similar cost-recovery mechanisms, the Department will thoroughly investigate the issues. One issue in particular that the Department intends to explore relates to the estimated costs to implement the bill-ready system and whether any proposed cost-recovery mechanism would be consistent with RSA 53-E:5, particularly who should be responsible for paying costs incurred. The Department also questions whether the Commission needs

to authorize deferred accounting treatment for recovery in each of the Joint Utilities' next rate cases, as an option requested in the petition. The Department has had preliminary conversations regarding a procedural schedule, and we will endeavor to finalize the schedule with all relevant parties in advance of the scheduled Pre-Hearing Conference or at the Technical Session following.


Sincerely,

A handwritten signature in dark ink, appearing to read "Matthew C. Young". The signature is fluid and cursive, with the first name "Matthew" being more prominent.

Matthew C. Young  
Hearings Examiner/Staff Attorney

cc: Docket Service List

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## Service List - Docket Related

Docket# : 23-063

Printed: 8/8/2023

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