

STATE OF NEW HAMPSHIRE



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September 30, 2024

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

via e-mail to: ClerksOffice@puc.nh.gov

Re: Docket No. DE 24-070
Public Service Company of New Hampshire
Distribution Service Rate Case

Dear Chairman Goldner:

The purpose of this letter is (1) to request leave to allow our analysts and likely future witnesses in the above-referenced proceeding – Ben Havumaki, Caroline Palmer, and Aidan Glaser Schoff of Synapse Energy Economics – to attend the “Commission-Attended Tech Conferences” occurring in this docket on October 1, 2, 8 and 9, and (2) to express concerns about a ruling made earlier today via the order captioned “Procedural Order Re; Requests for Remote Participation Filed by DOE and AARP.”

With respect to Mr. Havumaki, Ms. Palmer, and Mr. Glaser Schoff, we do not request permission for them to *appear* at the technical conferences. Rather they merely plan to observe these gatherings and, therefore, it would be an improvident use of our limited funds available for outside consultants to require them to travel from their home bases in Massachusetts to New Hampshire. The Commission has lagged behind other instrumentalities of state government in routinely livestreaming its public events; in these circumstances, denying our request based on untimeliness or the relative proximity of our consultants to Concord would be unduly harsh. We also note that, at this stage of the proceeding, months before the date on which the OCA must file the testimony of its witnesses, it would not be appropriate for the Commission to expect or require our potential witnesses to do anything more than observe.

Although I do not represent, and cannot take positions on behalf of, intervenor AARP, the OCA is concerned about the Commission’s ruling today denying AARP’s counsel the opportunity to participate remotely in the upcoming commission-attended technical conferences. AARP’s request for remote participation, dated September 27, 2024, stated that it would be “difficult and expensive” for the organization’s counsel to travel to New Hampshire – the organization having assumed, perhaps, that the Commission noted via his appearance letter that the attorney is based in St. Louis, Missouri.

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It is, of course, not the role of our office to presume to advise the PUC on how to treat an organization that, according to its intervention petition, represents more than 200,000 Granite Staters. But we are concerned with the tone and precedent set by such a ruling, particularly given the unprecedented nature of convening commissioner-attended technical conferences in rate cases – a practice that is nowhere authorized in statute or rule. We respectfully urge the Commission to reconsider its ruling about the AARP and allow all members of our team to observe the upcoming technical conferences as well. Thank you for your attention to our request and suggestion.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DKreis', written in a cursive style.

Donald M. Kreis
Consumer Advocate

cc: Service List (via e-mail)