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Submitted electronically.

Daniel Goldner, Chair
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

**RE: DE 24-070, Eversource Energy Rate Case
AARP Request for Reconsideration Regarding Its Remote Participation**

Dear Chairman Goldner:

Yesterday, September 30, 2024, the New Hampshire Public Utility Commission (Commission) issued a procedural order denying AARP's request to have its representative John B. Coffman participate remotely in the "Commission-attended prehearing technical conferences" on October 2-3 and 8-9, 2024 in this rate case. AARP respectfully urges the Commission to reconsider that decision, for the following reasons.

Equal application of procedural fairness suggests that AARP, as an intervenor in this rate case, should be granted the same accommodation that has been granted to the New Hampshire Department of Energy (DOE). In the very paragraph that the Commission denied the ability of AARP's expert to participate remotely in the proceedings this week, the Commission granted the DOE the ability for its experts to participate remotely, "due to the long distances that they would be required to travel". This is the same reason that AARP requests remote participation. Mr. Coffman resides in St. Louis, Missouri, and having him travel to New Hampshire for the "Commission-attended prehearing technical conferences" would cost AARP thousands of dollars, while remote accommodations are being made for another party.

The Commission notes that AARP's request was "untimely" due to a deadline stated in an earlier procedural order. However, AARP made the request as soon as possible after becoming aware of the nature of these conferences. It wasn't until the September 26, 2024 procedural order was issued in this case that it became clear to AARP that the Commission and other parties would be cross examining utility experts at the "Commission-attended prehearing technical conferences." No further agenda or other description has yet been made available to the public regarding the nature of this unprecedented event.

AARP New Hampshire has concerns about transparency and accessibility for the general public with regard to what may happen at the "Commission-attended prehearing technical conferences." The issues that are being discussed at these conferences (Performance Based Rates or some form of Formula Rates) could involve a fundamental departure from traditional "cost of service" utility ratemaking and would have a serious long-term economic impact on captive residential electric customers. And yet these conferences are being held before most parties have even had the opportunity to conduct much discovery in this rate case. While the general public has an enormous stake in the consequential discussions that will take place at these conferences, and the commissioners themselves are apparently going to be active at these conferences, AARP is not aware of any way for the general public to watch the proceedings.

Given the importance of these conferences, AARP further asks that the Commission provide for a broadcast (livestream) of the conferences taking place on October 2-3 and 8-9 in this rate case so that the public may observe what is happening at this event. Such an accommodation would at least allow AARP experts and volunteers around the state to be informed about what governmental regulators in New Hampshire are doing and saying on their behalf. Allowing transparency into this unusual process would greatly serve the public interest.

AARP New Hampshire therefore requests that John B. Coffman be allowed to participate remotely on all conference dates and that these conferences be broadcast live, with a transcript or video record of what occurs at these conferences available in the docket for this rate case.

Sincerely,



Christina FitzPatrick, State Director
AARP New Hampshire

cc: Service List in DE 24-070