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January 13, 2025

**Via electronic mail only**

Daniel Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**Re: Docket No. DE 24-070**  
Public Service Company of New Hampshire d/b/a Eversource Energy  
DOE Motion to Amend Procedural Schedule

Chairman Goldner:

On January 10, 2025, the Department of Energy (“DOE”) filed a request to Amend the Procedural Schedule (“Request”) in the above captioned proceeding. DOE requests to postpone the deadline for intervenor testimony by two weeks and the deadline for settlement and rebuttal testimony by three weeks, as well as reschedule settlement conferences and deadlines for data requests consistent with the proposed changes in the deadlines for testimony.<sup>1</sup>

As noted in the Request, Public Service Company of New Hampshire d/b/a Eversource Energy (the “Company”) has not assented to DOE’s proposed amendment of the procedural schedule at this stage of the proceeding in light of the substantial challenges that exist in changing deadlines for testimony, data requests and multiple settlement and prehearing conferences, and because there is no good cause for disruption of the schedule. The Company understands and acknowledges that the intervenors are dedicating significant resources to this proceeding and the parties prefer having additional time to review responses to data requests and develop their arguments. However, at this late stage of the proceeding, it is not necessary or advisable.

In the Request, DOE stated that the Company is late in providing certain technical session request responses as a basis for an amendment of the schedule. To the contrary, the Company agreed to provide DOE with an *additional* opportunity to issue data requests *after* the December 17, 2024 deadline for technical session data requests as a result of an a *subsequent* technical session that was held with the DOE on December 19, 2024. It is the requests from the subsequent technical session that the DOE is referring to, which the Company agreed to fulfill

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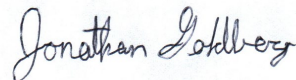
<sup>1</sup> DOE asserts that the additional time for intervenor testimony is needed because (1) the New Hampshire Public Utilities Commission (“Commission”) requested additional information on discrete topics at the January 7, 2025 Prehearing Technical Conference, (2) the DOE Final Audit Report is not complete, and (3) DOE is working hard to review the testimony, exhibits, and the responses to hundreds of data requests issued by DOE and other intervenors during this proceeding, which includes a performance-based ratemaking proposal, and DOE wants to avoid rushing the preparation of its testimony (Request at 2-3).

after the conclusion of the discovery period and that are outstanding as of this date.<sup>2</sup> The Company has made every effort to accommodate all parties' requests for information and for schedule changes. However, with respect to DOE's requested procedural changes now requested in their proposed amendment, the Company has multiple conflicts that cannot be resolved at this late stage. The procedural schedule has been set for some time now, and Company personnel have other commitments and regulatory proceedings that were scheduled around the already approved procedural schedule in this docket. Adjusting schedules at this late date is not feasible, nor is there any valid basis for doing so.

Regarding DOE's argument related to outstanding responses to Commission information requests, the Company's responses to the discrete Commission questions will not alter any of the Company's proposals in this proceeding and would not, therefore, impact any party's ability to develop testimony in response to the Company's filing. To the extent that a party deems it necessary to supplement their testimony based on the follow-up information to the January 7, 2025 Commission technical session, the Company would have no objection to parties supplementing testimony, so long as an supplementary testimony pertains only to those responses.

Consistent with current Commission policy, this filing is being made electronically only; paper copies will not follow.

Sincerely,



Jonathan A. Goldberg, Esq.

cc: DE 24-070 Service List

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<sup>2</sup> The Company held a technical session on December 12, 2024 to respond to questions about capital additions. Prior to the December 12<sup>th</sup> technical session, DOE identified a limited set of additional topics to address at the technical session; however, the appropriate personnel were unfortunately not available. The Company and DOE then scheduled a subsequent technical session on December 19, 2024 to address those topics. However, during the December 19, 2024 technical session, and after the December 17, 2024 deadline for follow-up data requests from technical sessions, DOE staff asked additional questions about capital additions that were not raised during the December 12, 2024 technical session. Nevertheless, the Company agreed to respond to additional follow-up requests from DOE, despite the expiration of the December 17<sup>th</sup> deadline. The Company explained that it would strive to provide responses in a timely manner but would not likely be able to provide the responses by the January 6, 2025 deadline for responses to requests issued by December 17, 2024.