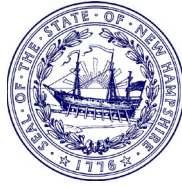


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DEPARTMENT OF ENERGY
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January 16, 2025

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

Re: DE 24-070, Public Service Company of New Hampshire d/b/a Eversource Energy Request for Change in Distribution Rates; Department of Energy's Response to Eversource Letter Opposing the Department's Request to Amend Procedural Schedule

Dear Chairman Goldner:

On January 13, 2025, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or "Company") filed a letter opposing the request made by the Department of Energy ("DOE" or "Department") on January 10, to adjust the procedural schedule in this matter by extending the date for Department and intervenor testimony by two weeks (without changing any hearing dates). This letter responds to Eversource's opposition and notifies the Commission and other parties that the Department will not be filing testimony in this case before February 7, 2025, at which time the Department will also submit a Request to Accept Late-Filed Testimony, if needed.

Eversource's letter contains several incorrect statements. First, it claims the Department's request is not necessary. In fact, the two-week extension is absolutely essential to the Department. The Department is preparing to submit eight pieces of testimony touching on virtually every issue in the Eversource rate proposal. Several testimonies are interdependent (for example the Department's revenue requirement recommendation is dependent on information from other testimony on capital investments, operation and maintenance (O&M) expenses, and rate of return on equity). Capital investments and O&M expenses are expected to be covered in the Audit Division's forthcoming Audit Report. The Final Audit Report is not expected to be available to the Department until January 31, 2025, at the earliest.

Eversource agreed to provide additional information that was asked for by the Commission at the January 7, 2025, pre-hearing technical conference; this information has not yet been submitted in this case. Despite Eversource's claim that this information "will not alter any of the Company's proposals in this proceeding", the information deals with core issues in the case (such as capital investments, employee benefits, and the

impact of pole acquisitions from Consolidated Communications) and may very well impact the Department's recommendations on these issues.

Eversource also claims that the Department asked questions about capital additions at a December 19, 2024, technical session that came after the December 17, 2024, deadline for follow-up data requests from technical sessions. The December 17 deadline was scheduled before the December 11 and 12, 2024, technical sessions were held and it was found that there was a need for a third technical session, which was ultimately scheduled for December 19, 2024. The Department submitted follow up data requests from the December 12 technical session on December 13, 2024, several of which Eversource had committed to providing responses to prior to the December 19, 2024, technical session in order for the Department to have time to review for discussion at the session. These responses were not provided until January 6, 2025. Additionally, as the December 19 session was scheduled after the December 17, 2024, deadline to file technical session data requests, Eversource agreed to allow requests submitted after the session. The Department submitted these requests on December 20, 2024 (the day after the session), requesting responses within 10 days of receipt pursuant to Puc 203.09(f). Responses were not filed until January 13, 2025, and January 14, 2025, with part of one response still outstanding.

The additional time is needed by the Department in part due to developments in other PUC dockets occurring after the schedule in this rate case was set. For example, DE 22-060 concerning net metering has not been completed, as was expected. Similarly, DE 23-039, Liberty Utilities' electric rate case has unexpectedly continued well into 2025. Likewise, DE 24-112, Eversource's Stranded Cost proceeding has developed into a much more complicated and time-consuming matter than was expected. These and other unforeseen docket developments contribute to the Department's need to file the testimony in the case on February 7, instead of January 24.

Sincerely,

/s/ Paul B. Dexter
Paul B. Dexter, Esq.
Legal Director

Cc: Service List

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