

Before the New Hampshire Public Utilities Commission

DOCKET NO. DE 24-070

Public Service Company of New Hampshire d/b/a Eversource Energy

Request for Change in Distribution Rates

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
REQUEST TO AMEND PROCEDURAL SCHEDULE FOR DEPARTMENT OF
ENERGY SUPPLEMENTAL TESTIMONY

Public Service Company of New Hampshire d/b/a Eversource Energy (“PSNH” or the “Company”) hereby submits, pursuant to Puc 203.07(b)(4) and (5), this request to the New Hampshire Public Utilities Commission (“Commission”) for a limited amendment to the procedural schedule in anticipation of the New Hampshire Department of Energy (“DOE”) submitting supplemental testimony to amend its preliminary testimony based on the result of the DOE Audit Report (“Audit Report”) consistent with the Commission’s January 17, 2025 Procedural Order.¹ In support of this request, the Company provides the following:

1. On January 10, 2025, the DOE filed a request to Amend the Procedural Schedule (“Request”) in the above-captioned proceeding. DOE requested 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.
2. On January 17, 2025, the Commission denied DOE’s motion but permitted DOE to supplement its timely filed testimony based on the DOE’s Audit Report. The Audit Report was issued on January 31, 2025.

¹ Procedural Order Denying the Department of Energy’s Motion to Modify the Procedural Schedule, at 4 (January 17, 2025).

3. On January 24, 2025, DOE filed testimony related to performance-based ratemaking (“PBR”), the allocated cost of service study, decoupling, rate design, return on equity, and weighted average cost of capital. DOE stated in its cover letter that it intended to file additional late-filed testimony on February 7, 2025 on the topics of capital expenditures, vegetation management, storm cost recovery, revenue requirements, depreciation, lead/lag study analysis, fee free credit/debit card payment option, the New Start program, additional testimony on PBR and decoupling, as well as testimony addressing audit issues. DOE also indicated that it intends to file a motion to accept late-filed testimony.
4. While the Company is not unsympathetic to DOE’s bandwidth constraints, the DOE’s decision not to file timely testimony on a variety of issues, as well as not participating in settlement discussions until the DOE files its additional testimony has caused significant hardship for the Company.² Nevertheless, the Company is prepared to review supplemental testimony on the Audit Report, which the Company expects should be very limited based on the small number of issues raised in the Audit Report. However, the deadline for the Company to issue data requests on intervenor testimony has passed and the deadline for the Company to submit rebuttal testimony is only six business days following when the DOE plans to submit their supplemental and late-filed testimony. The Company’s request for an extension of the deadlines is based on the need for additional time to address supplemental testimony based on the Audit Report which was not published until January 31, 2025.

² Effectively, DOE’s decision not to participate in settlement conferences means settlement discussions will not begin until Tuesday, February 11 at the earliest based on the procedural schedule, with any settlement agreement due February 18.

5. Given the limited issues in that Audit Report completed on January 31, 2025, the Company respectfully requests an extension of the deadline on which to issue data requests to DOE on their supplemental testimony to February 11, 2025, with responses due three business days later on February 14, 2025. The Company also requests an extension of the deadline to file Company rebuttal testimony from February 18, 2025 to February 20, 2025.³ The Company's request for a limited extension of the deadlines for data requests and rebuttal testimony is reflective of the limited issues identified by DOE's Audit Division and provides a measure of proportionate opportunity for Company to investigate and respond to DOE's positions on the limited issues identified in the Audit Report without impacting the schedule for hearings on the merits or deadline for settlement. The Company respectfully requests an expeditious response to this limited request for an extension of supplemental testimony related to the limited issues raised in the Audit Report.
6. Should the DOE file additional testimony on issues beyond those specifically listed in the Audit Report, thus providing new and not "supplemental" testimony, the Company will likely object to the inclusion of such testimony, and, if needed, request further extension of the deadlines for issuing data requests and rebuttal testimony. Due to the substantial effort that will be required to review late-filed testimony in a very brief amount of time, the Company respectfully requests that the Commission issue an expedited ruling on the DOE's upcoming request to file late-filed testimony (and objection to such motion that the Company may file) so the Company can determine whether it must dedicate significant resources, including subject matter experts, rate case consultants, and attorneys to analyze

³ In the event the Commission provides DOE more than three business days to respond to data requests, the Company respectfully requests a corresponding extension of the deadline for rebuttal testimony to allow time to review the responses and incorporate the information into testimony.

DOE's late-filed testimony and develop data requests and rebuttal positions in parallel with complying with the existing procedural schedule and negotiating a settlement agreement.

WHEREFORE, the Company respectfully requests that this Commission:

- A. Grant the Company's request for a limited modification to the procedural schedule in anticipation of the DOE submitting supplemental testimony to amend preliminary testimony based on the results of DOE Audit Report consistent with the Commission's January 17, 2025 Procedural Order;
- B. Grant an extension of the deadline on which the Company may issue data requests to DOE on its supplemental testimony to February 11, 2025, with responses due three business days later, on February 14, 2025;
- C. Grant an extension of the Company's rebuttal testimony from February 18, 2025 to February 20, 2025; and
- D. Grant such further relief the Commission deems just and reasonable.

Respectfully submitted,

Public Service Company of New Hampshire
d/b/a Eversource Energy

By its Attorneys,



By: _____

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Date: February 5, 2025

Certificate of Service

I hereby certify, pursuant to Puc 203.06(b)(2) that on February 5, 2025, a copy of this Motion has been forwarded to the service list for docket DE 24-070.

A handwritten signature in cursive script, appearing to read "Michael B. Hershberg".

Michael B. Hershberg, Esq.