

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
MOTION FOR EXTENSION OF FILING DEADLINE FOR JOINT EXHIBIT LIST AND
PERMISSION TO REFORMAT ALL EXHIBIT TITLES AND HEADERS**

Public Service Company of New Hampshire d/b/a Eversource Energy (“PSNH” or the “Company”) hereby submits, pursuant to Puc 203.07(b) this motion to the New Hampshire Public Utilities Commission (“Commission”) for an extension of the deadline for submitting the complete joint party list of exhibits with proposed numbering and document titles as required by Puc 204.13.

In support of this motion, the Company provides the following:

1. Consistent with Puc 204.13(a), the parties did confer regarding identifying and numbering exhibits. Since there are numerous parties to this docket, and this most recent phase of this docket has been rather condensed, the Company knew that it was unlikely that parties would be unable to get a list of exhibits to the Company in advance of the filing deadline for exhibits and the joint exhibit list. Because advance submissions would not be possible and to avoid either duplicate numbering or many open empty numbers held for exhibits, the Company proposed a combination of a letter/number exhibit naming convention, with each party assigned a letter (i.e. PSNH – A, so Exhibit A1, A2, etc.), to avoid overlap or gaps in the exhibit list. All parties agreed to this naming convention.
2. Two factors have complicated this approach and it seems that correction will be needed. First, there were already six exhibits filed for the temporary rates phase of this proceeding, so it should follow that the remaining exhibits follow the same single number sequence.

Second, it seems that state systems may not be able to accept a combination of letters and numbers in the titles of exhibits.

3. However, several parties have already filed their exhibits with the letter/number naming format, and others are in the process of finalizing the formatting of their exhibits so that they may timely file those exhibits by 4:30 today. This includes the Company, which has five exhibits planned, but two of those exhibits have many parts. Changing the naming convention at this late hour would cause some parties, including the Company, to miss the filing deadline for exhibits.
4. To avoid this, and so the Commission may benefit from receiving timely filed exhibits from all parties, the Company recommends that the parties continue to submit the exhibits in the format agreed upon among the parties. To resolve the formatting issue, to make all exhibits numbered consistent with the sequence already begun in this docket, the Company respectfully requests an extension of the submittal of the filing deadline for the joint comprehensive exhibit list with exhibit descriptions.
5. PSNH also requests permission to reformat all party exhibits to reflect a single number sequence that begins with the next available exhibit number continuing from the temporary rates exhibits (which would begin with Exhibit 7). This will involve updating the title and internal header of each exhibit. The Company would then resubmit all exhibits with the updated numbering and these exhibits would replace all previously submitted exhibits. No substance of any exhibit will be modified in any way.
6. I personally apologize for any inconvenience or confusion this may have caused. My intent was to give the parties the maximum amount of time to prepare their exhibits so that the Commission could receive exhibits in a timely manner. It was unknown that the agreed

upon naming convention would create technical problems. However, should the Commission grant this extension and permission to reformat the titles and headers of the exhibits, this will facilitate the prompt and orderly conduct of the proceeding as it will eliminate the potential for technical complications and confusion at the hearings in this docket. The Company recommends that all exhibits today be accepted with the understanding that the numbering convention will be updated and the properly numbered exhibits will replace those filed today.

7. This request for extension is being filed less than three days before the deadline because the problem was not discovered until midday today. The Company ask that the Commission grant the extension anyway under Puc 203.07(b)(4) because 1) there would be an undue hardship without an extension, as all parties filing exhibits have either already done so or are about to momentarily, and not extending the deadline for the exhibit list and changing the numbering format will cause all exhibits to be filed late, and 2) the extension will not unduly delay the proceeding or adversely affect the rights of any party or the Commission because, as previously noted, the Commission can retain the exhibits with the current formatting so that the Commission may begin its review; and no party will be adversely affected because the Company has offered to correct the formatting of all the exhibits on behalf of all submitting parties.
8. There was no time to ask the parties if they assent to this request, but I will contact all parties as soon as this motion is filed to ensure that all are aware of the situation. If any party wishes to handle changing the formatting for any of their exhibits themselves, the Company will of course take no issue with that.

WHEREFORE, the Company respectfully requests that this Commission:

- A. Extend the deadline for filing the joint comprehensive exhibit list required by Puc 204.13(a), to **Friday March 14;**
- B. Grant permission for the Company to update all exhibits filed by parties today in this docket to reflect a single number sequence continuing from the last of the temporary rates hearing exhibits and **resubmit all updated exhibits by Friday March 14;** and
- C. Grant any other relief that the Commission may find just and equitable.

Respectfully submitted,

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

By its Attorney,



By: _____
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Date: March 11, 2025

Certificate of Service

I hereby certify, pursuant to Puc 203.06(b)(2) that on March 11, 2025, a copy of this Motion has been forwarded to the service list for docket DE 24-070.

A handwritten signature in black ink, appearing to read 'J.A. Chiavara', is centered on the page.

Jessica A. Chiavara