



## OFFICE OF THE CONSUMER ADVOCATE

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June 21, 2022

New Hampshire Public Utilities Commission  
21 South Fruit Street  
Concord, New Hampshire 03301Re: Docket No. DE 20-161  
Public Service Company of New Hampshire d/b/a Eversource Energy  
2020 Least Cost Integrated Resource Plan

To the Commission:

The Office of the Consumer Advocate (“OCA”) is submitting this letter to explain why we object to the June 21, 2022 request – a mere five days ahead of the deadline in question – to extend the date for filing post-hearing reply briefs in the above-captioned docket by nearly a week, from June 26 to June 30. We have three reasons for our objection.

First, time is of the essence. Today a Committee of Conference assented to the Senate-passed version of House Bill 281, legislation that would, among other things, repeal the statute that governs this proceeding, effective 60 days after the Governor signs the bill into law (which he has indicated he intends to do). It is in the interests of Eversource, and its allies at the Department of Energy, to attempt to run out the clock here and prevent the Company from suffering the consequences of an inadequate Least-Cost Integrated Resource Plan. *See* RSA 378:40 (precluding rate changes for utilities lacking unapproved LCIRPs). Thus, contrary to the claim of the Department of Energy, the requested extension is likely to cause “undue hardship” on ratepayers (including those whose interests we represent) within the meaning of N.H. Code Admin. Rules Puc 202.04.

Second, the basis stated by the Department for the requested extension is vague and unpersuasive. The Department’s letter refers merely to the “press of other business” that “could not otherwise be assigned.” The Department’s legal staff vastly outnumbers that of the Office of the Consumer Advocate, yet we have never asked for extension of time to file a brief since I took office on February 13, 2016. All of the administratively attached agencies at the Walker Building confront the “press of other business” as we work in each PUC proceeding and yet the public interest requires the business of these agencies to proceed in a timely fashion.

Third, a key claim in the Department’s letter – that the Department would suffer hardship without the requested extension because arguments in the briefs of other parties “would not receive the comprehensive review necessary to permit the Commission to fully consider the matters at issue in this docket” – rings hollow. The Department opted not to file an initial brief

in this docket and should not be further rewarded for its decision to strategically withhold its argumentation. The arguments made in the initial brief of the OCA could not have been a surprise to any other party to this case.

This docket has been pending since October 1, 2020. The delay is unconscionable, it has harmed ratepayers, and, in these circumstances, it should not be allowed to persist even an extra week. Thank you for considering our opposition to the Department's request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DKreis', written in a cursive style.

Donald M. Kreis  
Consumer Advocate

cc: Service List, via e-mail