

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

**Public Service Company of New Hampshire
2013 Least Cost Integrated Resource Plan**

Docket No. DE 13-77

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S MOTION FOR
REHEARING/RECONSIDERATION OR CLARIFICATION OF ORDER NO. 25,659**

Pursuant to RSA 541:3, Public Service Company of New Hampshire ("PSNH") hereby requests that the Commission grant rehearing/reconsideration or clarification of the requirements for a future Least Cost Integrated Resource Plan ("LCIRP") as delineated in Order No. 25,659. In support of this Motion, PSNH says the following:

1. On January 29, 2013, the Commission issued Order No. 25,459 in Docket No. DE 10-261. That order, among other things, accepted and found adequate PSNH's 2010 LCIRP. Pursuant to that order PSNH was to file by September 3, 2013, a new LCIRP that was limited to the issues of transmission and distribution only. PSNH submitted this limited 2013 LCIRP on June 21, 2013, and on May 1, 2014, the Commission issued Order No. 25,659 accepting and finding adequate the 2013 LCIRP. As part of Order No. 25,659, the Commission stated that PSNH was required to file its next LCIRP no later than June 6, 2015, unless otherwise ordered by the Commission. By this submission, PSNH seeks reconsideration or clarification about both the timing and the content of its next LCIRP filing.

2. Pursuant to RSA 541:3, the Commission may grant rehearing or reconsideration when a party states good reason for such relief. *Public Service Company of New Hampshire*, Order No. 25,361 (May 11, 2012) at 4. Good reason may be shown by identifying new evidence that could not have been presented in the underlying proceeding or by identifying specific matters that were overlooked or mistakenly conceived by the deciding tribunal. *Id.* at 4-5.

3. With respect to the content of PSNH's next LCIRP filing, in Order No. 25,459 on PSNH's 2010 LCIRP the Commission described at length its expectations and recommendations for the content of PSNH's next "full," as opposed to abbreviated or limited, LCIRP filing, and stated that its recommendations were to be viewed as "guidelines" for the development of PSNH's next full LCIRP filing. *Public Service Company of New Hampshire*, Order No. 25,459 (January 29, 2013) at 19-21. In Order No. 25,659 the Commission acknowledged that there was pending legislation that could affect the timing and content of future LCIRP filings. As of the date of this filing, that legislation, House Bill ("HB") 1540, is enrolled at the Legislature and PSNH anticipates that it will soon be signed into law. Presuming that legislation is signed into law, it is not clear what PSNH would be required to do to comply with those new LCIRP filing requirements in light of the "guidelines" set out in Order No. 25,459. Should the legislation not be signed into law, it is also not clear what PSNH would be required to do to comply in light of the Commission's "guidelines."

4. Furthermore, in the instant docket, which was limited to issues of distribution and transmission planning only, PSNH agreed to include certain amendments to its future LCIRP filings. Those amendments are intended to further enhance the information provided relative to: distribution planning; the integration of least cost objectives into PSNH's planning processes; and demand side management programs. PSNH will also include other information on certain "Smart Grid" issues, in particular, distribution automation. Those agreed-upon amendments to future LCIRP filings do not directly address the "guidelines" set out by the Commission in Order No. 25,459 for PSNH's next full LCIRP filing. Accordingly, PSNH seeks reconsideration or clarification on the issue of whether its next LCIRP filing is to be a full filing, or something other than a full filing. If it is a full filing, the contents required for such filing will not be known until

the IR 13-020 investigation is concluded as described below, and even then further clarification may be required to understand how the determinations in that investigation affect PSNH's planning processes. In such a case, PSNH would request that the Commission stay/waive any filing requirement pending the outcome of the investigation. If it is to be something other than a full filing, PSNH seeks clarification on whether the filing is limited to issues of distribution and transmission, or whether other requirements are to be included as well. If it is to be anything other than distribution and transmission, PSNH requests that the Commission clarify how, if at all, the "guidelines" in Order No. 25,459 are to be incorporated into PSNH's planning processes, particularly in light of HB 1540. For the above reasons, PSNH believes that reconsideration or clarification of the contents of its next LCIRP filing following Order No. 25,659 is justified.

5. With respect to the timing of PSNH's next LCIRP filing, in Order No. 25,459 the Commission stated that PSNH's next full LCIRP would be filed "subsequent to the resolution of the DE 13-020 investigation, and after PSNH's abbreviated 2013 LCIRP filing." *Id.* at 21. Docket No. IR 13-020 was opened to investigate issues relating to PSNH's continued ownership of generation and, as of the date of this filing, a "Preliminary Status Report" has been submitted by Staff to accompany a valuation analysis conducted by consultants retained by the Commission. That report contained various recommendations for further action by both the Commission and the Legislature. At this juncture, it is not clear what additional steps remain in the Commission's investigation, nor the expected duration of the investigation. It could be that the investigation will last substantially into 2015 and/or that it will be tied to other legislative or regulatory matters which could last well into 2015. In that PSNH's next full LCIRP is to be submitted following the resolution of that investigation, PSNH may or may not be able to comply with the June 6, 2015 deadline set by the Commission in Order No. 25,659.


Accordingly, PSNH seeks reconsideration or clarification of the timing of its next LCIRP filing in light of the requirements of Order No. 25,459 and the duration of the Commission's investigation in Docket No. IR 13-020.

WHEREFORE, PSNH respectfully requests that the Commission:

- A. Grant this Motion for Rehearing/Reconsideration or Clarification; and
- B. Order such further relief as may be just and equitable.

Respectfully submitted,
Public Service Company of New Hampshire

June 2, 2014
Date

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Motion for Rehearing/Reconsideration or Clarification to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

June 2, 2014
Date


Matthew J. Fossum