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Via electronic mail only

Daniel Goldner, Chair
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 19-197 Development of a Statewide, Multi-Use Online Energy Data Platform
Electric and Natural Gas Utilities – notification of additional issues to be discussed at 10/6 prehearing conference

Chair Goldner:

This letter is submitted on behalf of Public Service Company of New Hampshire d/b/a Eversource Energy; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; Unitil Energy Systems, Inc. (UES); Liberty Utilities (EnergyNorth Natural Gas) Corp d/b/a Liberty; and Northern Utilities, Inc. (Northern) (together the “NH Utilities”), to provide notice to the New Hampshire Public Utilities Commission (“Commission”) of the need to discuss additional open issues surrounding the deliverables required by Order No. 26,589 as clarified by Order No. 26,644. The NH Utilities request that the Commission include the following topics for discussion at the October 6, 2022 prehearing conference so that the Commission, the NH Utilities and other parties may reach a common understanding of those issues, which will facilitate the proceeding.

First, the NH Utilities are aware of the need to contract for outside resources to develop the cost/benefit model updates required by Order No. 26,644. In that Order, the Commission required that “if, in the future, any of the NH Utilities believe that the effort in this docket will require outside resources, they should alert the Commission to those needs, estimate costs, and account for those costs separately going forward.” (Order No. 26,644 at 10). Therefore, the NH Utilities are so alerting the Commission at this time.

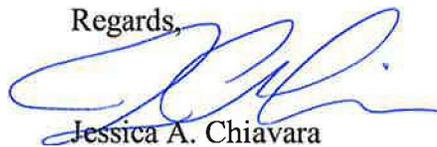
The NH Utilities intend to contract with Dunsky Energy Consulting (“Dunsky”) on a sole-source basis, as opposed to a competitive RFP. There is a significant justification for sole-sourcing this contract. Dunsky created the cost/benefit report the NH Utilities relied upon at the previous prehearing conference in this docket held on June 3, 2022. Order No. 26,644 states that “[t]he parties may rely upon the Dunsky Report found at Attachment A to the Memorandum. The Commission will require the parties to update the Dunsky Report methodology with more recent and more geographically relevant assumptions, i.e., related to New Hampshire or New England.” (Order No. 26,644 at 7). Given that the parties to the docket are relying in part on work that Dunsky has done, it stands that Dunsky would be in the unique position to most efficiently and cost-effectively update the methodology and tailor findings to the geographic region of New

Hampshire or New England. At this time, Dunsky has provided an initial estimate of \$100,000 to complete the required work. This estimate is not a “not to exceed” price, and the work could ultimately result in costs greater to or lesser than \$100,000. In the assessment of the NH Utilities, discussing the contract with at the October 6 prehearing conference for the work required by Order No. 26,644, and receiving the Commission’s assent to entering the contract would be valuable for the Commission and the NH Utilities and would assure that the NH Utilities properly account for these costs through a separate regulatory accounting mechanism.

The NH Utilities and other parties to the docket would also seek to discuss the sequence of deliverables required by the relevant Commission Orders in this docket, and the ability—or lack thereof—to present these deliverables at the status conference that is to take place by the end of this calendar year. Because certain items will require prior Commission approval and the completion of those items are conditions precedent for beginning work on other deliverable items, only some of the deliverables required by the relevant Orders will be sufficiently complete for presentation at the status conference. For instance, the cost/benefit analysis cannot be completed until the costs are known, which will require issuing the RFPs that require Commission approval prior to issuance. Therefore, the NH Utilities would like to discuss at the October 6 prehearing conference an alternative approach where only the prerequisite deliverables are presented at the status conference, and the remaining deliverables are developed subsequent to the status conference. To facilitate this approach, a second status conference would be scheduled for sometime late in the first quarter or early in the second quarter of 2023.

The NH Utilities are aware that only three hours are allotted for the prehearing conference on October 6, 2022, and will be mindful of time when addressing each of these issues in addition to the presentation of the data platform interface. Consistent with current Commission policy this letter is being filed electronically only; paper copies will not follow. If you have any questions, please contact me. Thank you for your assistance with this matter.

Regards,

A handwritten signature in blue ink, appearing to read 'J. Chiavara', written over a light blue horizontal line.

Jessica A. Chiavara

Senior Counsel, Eversource Energy
o/b/o the NH Utilities

cc: 19-197 Service List