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DEPARTMENT OF ENERGY  
21 S. Fruit St., Suite 10  
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October 14, 2022

Daniel Goldner, Chairman  
Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

Re: Dkt. DE 20-161, Public Service Company of New Hampshire, d/b/a/  
Eversource Energy, 2020 Least Cost Integrated Resource Plan, *DOE  
Response to OCA Regarding LCIRP Supplements*

Dear Chairman Goldner:

The Department of Energy (DOE) is writing in response to the letter the Office of the Consumer Advocate (OCA) filed into this docket on October 6, 2022, in which the OCA opposed Public Service Company of New Hampshire, d/b/a Eversource Energy ("Eversource" or "the Company")'s proposal to supplement its least cost integrated resource plan (LCIRP). The OCA's letter also referenced its more extended argument in Docket DG 17-152, in which the OCA objected to Liberty's "Motion for Waiver of Certain LCIRP Requirements," filed on September 29, 2022. *See* link at Tab 142 [Microsoft Word - rehearing procedural 220929.docx \(nh.gov\)](#). (The OCA's letter did not object to Eversource's request to alter the procedural schedule to have more time in which to develop and file a supplement.)

In the opinion of the DOE, whether the LCIRP statute allows for "serial compliance" i.e., a supplemental filing in this instance to potentially allow Eversource to comply with the requirements of RSA 378:39, is not ripe for review at this time. However, the DOE reserves the right to address the merits of that issue at a future date, after Eversource files any supplement, and in the event that the OCA renews its objection thereafter.

DOE further notes that on October 7, 2022, the Commission granted Eversource's request to alter the procedural schedule and canceled the October 18 and October 19 hearing dates. *See* Procedural Order (October 7, 2022).

Consistent with the Commission's current policy, this letter is being filed solely in electronic form.

Sincerely,

*/s/ Mary E. Schwarzer*

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