

STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

DE 22-031

Eversource Energy

Petition for Recovery of [2021] Storm Expenses

**DEPARTMENT OF ENERGY'S MOTION TO ENLARGE TIME TO INVESTIGATE PUBLIC
SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY'S
PETITION FOR RECOVERY OF [2021] STORM EXPENSES
THROUGH AUGUST 26, 2022**

NOW COMES the New Hampshire Department of Energy (DOE) and in response to the Public Utility Commission (Commission)'s *Procedural Order re Applicable Deadlines (June 10, 2022)*, seeks additional time through August 26, 2022, in which to investigate Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource or the Company)'s *Petition for Recovery of [2021] Storm Expenses* in the instant docket.

In support of this motion, Energy states as follows:

I. Background

1. By Procedural Order dated June 10, 2022, the Commission directed the DOE to complete its investigation and issue its final report, as well as notify the Commission whether further process and/or a hearing will be required by July 18, 2022. *See* Commission's Procedural Order (June 10, 2022).
2. Undersigned counsel apologizes for the delay in filing and the resulting inconvenience to the Commission. Due to an unanticipated press of other business for undersigned counsel, including but not limited to extended settlement efforts in Docket DG 17-152, based on a recent Commission directive following a June 21, 2022 status conference in that docket, and similar issues for the Regulatory Analyst, DOE is unable to complete the investigation and analysis and file a report as of today's date. *See, e.g.*, Dkt. DG 17-152 Commission Procedural Order Re: Status Report (assigning a July 11, 2022 deadline). DOE notes DOE recently filed a Report and Recommendation regarding Eversource's 2020 Storm expenses on July 15, 2022 in Dkt. DE 21-089.

3. DOE respectfully notes that DOE shared with the Commission that the audit and analysis in this 22-031 docket are “highly unlikely to be complete on or before July 15, 2022.” See DOE Motion to Enlarge Time (May 27, 2022) in Dkt. DE 21-089. DOE did not mean in any way to suggest that the analysis and audit would be complete immediately after July 15, 2022 either, and regrets any resulting confusion.

II. DOE Seeks an Enlargement of Time Through August 26, 2022.

4. DOE contacted Eversource’s counsel earlier today, before the deadline expired, to propose an enlargement of time through August 26, 2022. Eversource, by and through counsel Jessica Chiavera, was on vacation last week. Attorney Chiavera has not responded in the brief time DOE made available to her.

5. If DOE’s review and investigation of Eversource’s *Petition* in this docket is completed sooner than anticipated, DOE’s final report will be filed promptly thereafter. At that time, the DOE will also indicate whether DOE believes further process or a hearing will be required.

6. In sum, DOE seeks additional time in which to complete its review and investigation of Eversource’s pending *Petition for Recovery of [2021] Storm Expenses* through August 26, 2022.

7. In the opinion of DOE, if the Commission were to deny this request for additional time to review and investigate, DOE would be caused undue hardship. The DOE Regulatory Support Division and the Legal Division would be caused “undue hardship” and “inconvenience” as those terms are used in the Commission’s administrative rules, were they required to expedite review and investigation of the Company’s *Petition for Recovery of Storm Expenses* on a more accelerated timeline. See N.H. Code of Administrative Rules Puc 202.04. Granting the request will not unduly delay the proceeding or adversely affect the rights of any party, as Eversource does not object and the proposed delay is relatively short, under

WHEREFORE, Energy respectfully requests that the Commission:

- A. GRANT DOE’s request to enlarge the time for its review and investigation of Eversource’s *Petition for Recovery of Storm Expenses* **through August 26, 2022**, noting that Eversource has

not responded, however Eversource was aware of DOE's statement as recited in paragraph 3, *supra*, when DOE sought an enlargement of time in Dkt. DE 21-089, neither has Eversource indicated a pressing need for DOE's Report and Recommendation in this docket.

B. GRANT such other and further relief as is equitable and just.

Respectfully submitted,

Date: July 15, 2022

/s Mary E. Schwarzer

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Certificate of Service

I hereby certify that on July 15, 2022, a copy of this objection has been electronically forwarded to the service list.

Mary E. Schwarzer

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