

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 23-004

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
d/b/a EVERSOURCE ENERGY

Proposed Purchase of Receivables Program

MOTION TO AMEND PROCEDURAL SCHEDULE

Pursuant to N.H. Code of Administrative Rules Puc 203.07, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”), respectfully requests that the New Hampshire Public Utilities Commission (the “Commission”) amend the approved procedural schedule in this proceeding to extend the deadline for responses to Technical Session Data Requests currently set for Tuesday, May 16, 2023. The requested amendment to the procedural schedule will provide the Company with the time necessary to respond to the number and scope of the 46 Technical Session Data Requests that it received following the May 8, 2023 Technical Session. In support of this request, Eversource states as follows:

1. On January 10, 2023, in accordance with Puc 2205.16(e), the Company filed a proposal for a purchase of receivables (“POR”) program. The Commission docketed this matter as DE 23-004. The parties in this proceeding are Eversource, the Department of Energy (“DOE”), NRG Retail Companies, Inc. (“NRG”), and the Community Power Coalition of New Hampshire (“CPCNH”) (collectively, the “Parties”).

2. On April 5, 2023, the DOE filed a procedural schedule agreed upon by the Parties with the Commission for its review and approval. The schedule includes both a “settlement track” and a “rebuttal track,” and the DOE filing explained that the Parties will file a status report with the

Commission on July 18, 2023 to identify which of those two tracks the Parties intend to follow. On April 10, 2023, the Commission issued an order approving the proposed schedule.

3. Consistent with the approved procedural schedule, on April 12, 2023, the DOE issued the Company 19 initial Data Requests and Eversource responded to those Data Requests by the procedural deadline of April 26, 2023. On May 8, 2023, the Parties held the first of two Technical Sessions, and 46 Technical Session Data Requests were issued to the Company on May 10th. According to the approved procedural schedule, Eversource's responses to the Technical Session Data Requests are due within only five business days, i.e., on May 16, 2023.

4. Due to the great number and scope of the 46 Technical Session Data Requests, the Company requires additional time to compile and review the data requested by certain Parties and to conduct research and analyses that must be reviewed and verified prior to filing the responses to those Data Requests. In addition, key Eversource personnel will require additional time to review and verify the information provided in response to the Data Requests to ensure that thorough and accurate responses are provided.

5. On Monday, May 15, 2023, the Company contacted DOE, NRG, and CPCNH to request that the Parties agree to a one-week extension of the deadline for the Company to respond to the Technical Session Data Requests, from May 16th to May 23rd. The Company proposed that all other dates in the approved procedural schedule remain unchanged. Each Party responded to confirm its assent to the proposed deadline extension.

6. Although the Company is currently compiling relevant information and has begun developing responses to the Technical Session Data Requests, Eversource respectfully requests that the Commission grant this request on an expedited basis, prior to the existing May 16, 2023 deadline to file responses to the Technical Session Data Requests.

WHEREFORE, Eversource respectfully requests that the Commission amend the procedural schedule for this docket to extend by one week the deadline for the Company's responses to the Technical Session Data Requests, from May 16th to May 23rd, and that the Commission grant such other or further relief as may be just and reasonable.

Respectfully submitted,

Public Service Company of New Hampshire d/b/a Eversource
Energy

Date: May 15, 2023

By: /s/ David K. Wiesner

David K. Wiesner

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

/s/ David K. Wiesner

Date: May 15, 2023

David K. Wiesner