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DEPARTMENT OF ENERGY  
21 S. Fruit St., Suite 10  
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December 29, 2023

Daniel C. Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street  
Concord, NH 03301

Re: DG 23-086 Northern Utilities, Inc. Petition for Approval of Revenue Decoupling Adjustment Factor, *DOE's Proposed REVISED Procedural Schedule*

Dear Chairman Goldner:

Enclosed please find the New Hampshire Department of Energy (“DOE” or “the Department”)’s proposed REVISED procedural schedule. It provides additional time for DOE’s analysis and otherwise maintains the schedule increments as initially submitted by the parties and approved by the Commission. *See Chart (below)*. The Office of the Consumer Advocate (OCA) assents to this proposed schedule. Northern Utilities Inc. (“Northern” or “the Company”) does not object to the relief requested.

The Department has reviewed the December 22, 2023 letter Northern filed with the Commission. Northern anticipated that RDAF rates would be final as of November 1, 2023. DOE agreed to support Northern’s collection of those rates as of November 1, 2023, so long as the rates were contingent upon further DOE review. Therefore, consistent with the requirements of New Hampshire Admin. Rule Puc 202.04, *Extensions of Time*, in DOE’s opinion the proposed revised procedural schedule will not unduly prolong the proceeding or adversely affect the rights of any party.

The Department appreciates Northern’s response to DOE’s Set 3 data requests a week in advance of the response date. *See Northern’s Dec 22, 2023 Letter at 2*. However, given that the Company could not provide the data requested in DR 3-1 or otherwise complete the excel sheet provided, the Department requires additional time to take an alternative approach. Had Northern been able to provide the requested data, the DOE may have been able to complete its analysis and issue a supplemental technical statement within the timeframe allowed under the approved procedural schedule. Nonetheless, in retrospect, the DOE could have recognized the need for a revised schedule sooner. *See DOE Tech Statement at 9 (referencing intent to update technical statement)*.

The Department understands that Northern cannot file a rebuttal to a position DOE has yet to fully define. *See Northern’s Letter referencing DOE Technical Statement (Dec. 8, 2023)*. The DOE is requesting the minimum time needed for DOE’s alternative analysis. Were the Commission not to grant the additional time, DOE would be caused undue hardship and could not complete its review. *See Puc 202.04 (requiring undue hardship)*.

For the reasons set forth above, DOE has met the requirements of Puc 202.04, and respectfully requests that the Commission approve the following proposed REVISED procedural schedule (which no party objects to):

<u>Event</u>	<u>Original</u>	<u>REVISED</u>
DOE Tech Statement	12/8/23	<b>01/25/24</b>
Northern's DRs to DOE re Tech Statement	12/12/23	<b>01/31/24</b>
DOE Response to DRs	12/19/23	<b>02/07/24</b>
Northern's Rebuttal Testimony or Tech Statement	12/22/23	<b>02/12/24</b>
Hearing	01/22/23	<b>week of 02/26/24</b>

Consistent with the Commission's current practices, this letter is being filed only in electronic form. Thank you for your assistance in this matter.

Sincerely,

*/s/ Mary E. Schwarzer*

Mary E. Schwarzer, Esq.  
Hearings Examiner

Encl.

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