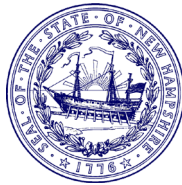


STATE OF NEW HAMPSHIRE

COMMISSIONER
Jared S. Chicoine

DEPUTY COMMISSIONER
Christopher J. Ellms, Jr.



DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-3670

FAX No. 271-1526

Website:
www.energy.nh.gov

October 29, 2024

Daniel Goldner, Chairman
Public Utilities Commission
21 South Fruit St., Ste. 10
Concord, NH 03301

RE: DRM 24-085/NH Code of Administrative Rules Puc Ch. 100 Organizational Rules
New Hampshire Department of Energy Comments on Initial Proposal

Dear Chairman Goldner:

Pursuant to the Rulemaking Notice by the Public Utilities Commission (PUC and/or Commission), the Department of Energy (Department) provides these comments regarding the PUC's *draft* Final Proposal for adoption of Puc 100 Organizational Rules.

In its August 26, 2024 letter, the Department provided comments which have been adopted by the Commission. The Department notes one remaining potential revision to be made in the definition of "Customer" at Puc 101.05.

1) **Part Puc 101 Definitions**

Puc 101.05 "Customer": In its August 26, 2024 letter, the Department provided comments regarding revising Puc 101.05 and the Department's suggested revisions have been adopted by the Commission. The Commission has used the En 1202.06 definition of "customer" which maintains consistency across Commission and Department rules.

However, when comparing the proposed language in Puc 101.05 to En 1202.06, the Department notes that there appears to be some excess verbiage (perhaps unintentional) included in the proposed Puc 101.05 text. Also, the Department notes that the word "partnership" was excluded from the definition of "customer," at Puc 101.05 and suggests that it be reinserted. In sum, the Department suggests that the PUC adopt the definition of customer from En 1202.06 exactly.

Sincerely,

/s/ *Marie-Helene Bailinson*

Marie-Helene Bailinson, Esq.
Hearings Examiner

ClerksOffice@puc.nh.gov
Adam.Yusuf@Libertyutilities.com
alexandra.k.ladwig@energy.nh.gov
amanda.o.noonan@energy.nh.gov
carolann.howe@pennichuck.com
chris@cleanenergynh.org
christopher.j.ellmsjr@energy.nh.gov
Clifton.Below@CommunityPowerNH.gov
david.j.shulock@energy.nh.gov
david.wiesner@eversource.com
Deana.Dennis@CommunityPowerNH.gov
donald.m.kreis@oca.nh.gov
donald.ware@pennichuck.com
dpatch@orr-reno.com
elizabeth.r.nixon@energy.nh.gov
Energy-Litigation@energy.nh.gov
Erica.Menard@libertyutilities.com
erin.engstrom@eversource.com
George.Torres@Pennichuck.com
golding@communitychoicepartners.com
henry@cpcnh.org
htombarello@lewisbuilders.com
jay.kerrigan@pennichuck.com
jessica.chiavara@eversource.com
jjs@rathlaw.com
john.boisvert@pennichuck.com
john@lewisbuilders.com
justin@nhwaterlaw.com
leah@Lakesregionwater.com
lrwh2oserv@yahoo.com
mab@nhbrownlaw.com
Marie-Helene.B.Bailinson@energy.nh.gov
marisa.paruta@eversource.com
mary.e.schwarzer@energy.nh.gov
Matthew.C.Young@energy.nh.gov
Mconnors@nepga.org
melissa.price@eversource.com
meredith.hatfield@tnc.org
michael.sheehan@libertyutilities.com
Michelle.Azulay@libertyutilities.com
Molly.M.Lynch@energy.nh.gov
nhregulatory@eversource.com
ocalitigation@oca.nh.gov
paul.b.dexter@energy.nh.gov
rburke@nhla.org
rclouthier@snhs.org
rcronin@lewisbuilders.com
Robert.Garcia@libertyutilities.com
rorie.e.patterson@energy.nh.gov
sandra.gagnon@eversource.com
sean_carroll2@comcast.com
sgeiger@orr-reno.com
stower@nhla.org
Susan.M.Gagne@energy.nh.gov
taylorp@unitil.com
thomas.getz@mclane.com
Tyler.Culbertson@libertyutilities.com