

**STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

Rulemaking

**Docket No. DRM 24-086**

New Hampshire Code of Administrative Rules Puc ch. 200 Procedural Rules

**REDLINE EDITS AND COMMENTS OF THE JOINT UTILITIES**

**EXECUTIVE SUMMARY**

Public Service Company of New Hampshire d/b/a Eversource Energy, Unitil Energy Systems, Inc., and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (the “Joint Utilities”) respectfully submit for the Commission’s consideration the attached redline edits of the Commission’s initial proposal for changes to the Puc 200 rules (“Rules”) with explanatory comments supporting the edits, as well as this executive summary.

At a high level, the purpose of these comments and redlined edits is to aid the Commission in realizing its objectives to update the Rules to more accurately reflect the reality of regulatory practice since the split of the Public Utilities Commission into two agencies with the creation of the New Hampshire Department of Energy (“DOE”) in 2021 and to ensure the Commission has a meaningful role in the dockets that come before it under this new structure. Over the last three years since the legislature restructured the Commission and created the DOE, the regulators and the regulated community, as well as other key stakeholders frequently appearing before the Commission, have all faced a steep learning curve as to how to best approach this new and unfamiliar regulatory landscape while adhering to all existing New Hampshire laws and rules - notwithstanding the fact that some of those authorities became outdated with the split of the agencies. The Joint Utilities appreciate the Commission’s efforts to update the Rules to adapt to these still relatively new circumstances, and likewise appreciate the consideration being given to the perspectives of those who practice before the Commission, so that the final updated rules facilitate an efficient, effective, and transparent process for all matters coming before the Commission.

The Joint Utilities are also aware of and support the Commission’s interest in having greater access to information from the parties earlier in a proceeding than at the time of final hearings in the matter, to ensure that the Commission can render a fully-informed and timely decision. Such enhanced efficiency represents a laudable objective, and the Joint Utilities hope that these edits will facilitate that goal while operating firmly within the bounds of the Administrative Procedure Act and other applicable statutory provisions. These redlined edits endeavor to address two types of issues presented: logistical matters and process issues. At a high level, the edits focus on providing greater precision and clarity, so that the direction provided to entities appearing before the Commission is unambiguous, thereby avoiding multiple interpretations and preferred applications of the rules by different parties with potentially

competing interests in the matter. The initial proposal put forth by Commission staff sought to present a clear approach to revising the Rules, but certain provisions left considerable room for interpretation, which could result in confusion and complication for all concerned, potentially having an adverse impact on administrative efficiency and regulatory certainty. The Joint Utilities hope these edits will remedy those issues of potential clarity, while forging a clear path for constructive, transparent, and administratively efficient practice before the Commission.

Explanations for certain of the redlined edits are provided in comment bubbles alongside the edits in the attached PDF document, while others should be self-explanatory.