



JUSTIN C. RICHARDSON

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October 22, 2024

Via Electronic Service Only
Daniel C. Goldner, Chairman
c/o ClerksOffice@puc.nh.gov
NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301-2429

Re: DRM 24 – 86: Final Comments re: Proposed Amendments to the Commission’s Procedural Rules, Puc 200.

Chairman Goldner and Commissioners:

Thank you again for holding the hearing on October 12, 2024 regarding the proposed amendments to the Commission’s procedural rules, Puc 100 & 200.

Based on prior comments and discussions on October 12, 2024, Lakes Region offers the following change to Proposed Rule 2013.19 concerning *Orders Nisi* for the Commission’s consideration:

- **“Orders nisi.** In a docketed matter, the commission may elect to issue a final order with a delayed effective date referred to as an order nisi, if permitted under New Hampshire law and the commission determines that the record is sufficient to support a commission decision without further process. Any order nisi shall include a notice and publication requirement to allow interested parties an opportunity to object or request a further hearing. An interested party that fails to timely intervene or participate in a proceeding shall demonstrate good cause for late-intervention as provided by RSA 541-A:32, II.”

This amendment or a similar one should help clarify that an interested party who fails to timely intervene or participate in a proceeding is required to meet the standard for late intervention as provided by RSA 541-A:32, II.

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Legal representation in the areas of water, utility, environmental and land use law in court and before state and local boards.

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If there are any questions concerning this request, please contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Justin Richardson". The signature is written in a cursive, flowing style.

Justin C. Richardson, Esq.

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Cc: Service List for Puc 200 Rules