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Via Electronic Mail Only

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Docket No. DE 24-087, Public Service Company of New Hampshire, d/b/a
Eversource Energy, Petition for Exemption from Town of Bethlehem Zoning
Ordinance, Art. II, Part D, under RSA 674:30, III
Parties' Update Regarding Docket Procedural Schedule and Scope Issues

Dear Chairman Goldner:

Public Service Company of New Hampshire d/b/a Eversource Energy, the Town of Bethlehem, the Department of Energy, and the Office of the Consumer Advocate (collectively, the "Parties") hereby submit this update regarding a proposed procedural schedule for this proceeding, consistent with the commitment made during the prehearing conference held on September 16, 2024. Following the prehearing conference, the Parties engaged in discussions regarding the scope of inquiry and standards for exemption approval required under RSA 674:30, III, and how those issues would impact the scope and extent of discovery to be reflected in any proposed docket procedural schedule.

As a result of those discussions, it became apparent that there was fundamental disagreement among the Parties regarding the scope of review required for approval under that statute, and the related scope and extent of any necessary discovery pertaining to this zoning appeal. The Parties agreed it would be beneficial to have those fundamental scope issues resolved prior to moving forward with the discovery process, with the expectation that a determination of scope would be provided within the relatively near term.

Accordingly, the Parties have agreed that Eversource will file a Motion for Clarification of Scope of Proceeding on or before October 4, 2024, and other Parties may file an objection or other response to that motion on or before October 22, 2024. The Parties would respectfully ask that the Commission then issue an order clarifying the scope of the proceeding within three weeks following the Parties' final filing regarding the scope issues. Following clarification of the scope of the proceeding, the Parties can reconvene and develop a procedural schedule based on that scope for submission to the Commission.

Consistent with current Commission policy, this filing is being made electronically only and paper copies will not follow.

Sincerely,

/s/ David K. Wiesner

David K. Wiesner
Principal Counsel

cc: DE 24-087 Service List