CHAIRMAN Thomas B. Getz

COMMISSIONERS Clifton C. Below Amy L. Ignatius

EXECUTIVE DIRECTOR AND SECRETARY Debra A. Howland THE STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION 21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429 Tel. (603) 271-2431

FAX (603) 271-3878

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

Website: www.puc.nh.gov

April 28, 2011

Debra A. Howland Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street Suite 10 Concord, New Hampshire 03301

> Re: Docket No. DE 11-070 Public Service Company of New Hampshire Certification of Exogenous Events Request for Additional Time



Dear Ms. Howland:

Pursuant to a Settlement Agreement approved by the Commission in Order No. 25,214 (April 26, 2011) in Docket No. DE 09-035, the most recent distribution rate case for Public Service Company of New Hampshire (PSNH), PSNH may on an annual basis request to adjust distribution rates upward or downward in response to Exogenous Events if the total distribution revenue impact, positive or negative, of all such events exceeds \$1,000,000 in any calendar year. Section 12 of the Settlement Agreement sets out in detail the definitions and requirements governing PSNH's annual filing for an Exogenous Event adjustment.

Specifically, Section 12.4 provides that, if a qualifying Exogenous Event occurred in the prior calendar year, PSNH will make a filing (Certification of Exogenous Event) no later than March 31 of the following year; and Staff and the Office of Consumer Advocate (OCA), on or before May 1 of such year, may make a filing requesting an Exogenous Event rate decrease or contesting an Exogenous Event rate increase proposed by PSNH. Section 12.4 also contemplates that any associated rate change would take effect July 1 of the year in which the filing is made.

On March 28, 2011, PSNH filed a Certification of Exogenous Events for (1) Medicare Subsidy Credit; and (2) Bonus Tax Depreciation. On April 14, 2011, Staff propounded discovery on PSNH concerning this filing and requested responses by April 25, 2011. PSNH did not file the responses as requested and Staff expects to receive them by the end of this week; however, the delay has impeded the ability of Staff and the OCA to review

the filing according to the time lines provided by the Settlement Agreement and limits the Staff and the OCA's ability to respond to PSNH's filing in an informed and meaningful manner. Therefore, Staff and the OCA respectfully requests that the Commission extend until May 13, 2011 the deadline for Staff and the OCA filing referenced in Section 12.4 of the Settlement Agreement.

We believe an extension is in the public interest because it will allow Staff and the OCA to thoroughly review the filing and make an appropriate recommendation to the Commission. According to Order No. 25,214, "[a]ny adjustments resulting from an exogenous event are subject to review and approval as deemed necessary by the Commission and are to be implemented for usage on and after July 1 of that year." If Staff or the OCA disagrees with PSNH's filing, the Commission could hear this matter on June 23, 2011 along with other proceedings involving adjustments to PSNH rates proposed for effect on July 1, 2011. Therefore, the extension requested by Staff and the OCA will not unduly delay a 2011 Exogenous Event adjustment, if any, or adversely affect the rights of PSNH.

Staff informed PSNH of this matter and PSNH has represented that it concurs with this request.

Please let me know if you have any questions. Thank you for your consideration.

Sincerely,

Suzanne G. Amidon Staff Attorney

Service List Meredith A. Hatfield, Esq.