

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

Docket No. DE 11-215  
Docket No. DE 11-216  
and  
Docket No. DE 11-217

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S  
MOTION TO MODIFY THE PROCEDURAL SCHEDULES  
AND  
TO WAIVE THE SCHEDULE PROVISIONS OF RULE PUC 203.09**

Pursuant to Rule Puc §203.07 and §201.05, Public Service Company of New Hampshire (hereinafter "PSNH" or "the Company") hereby requests that the Commission modify the procedural schedules and waive the schedule provisions of Rule Puc 203.09 in the following dockets due to the emergency service restoration efforts that are underway as a result of the major snow storm that occurred October 28 – 29, 2011:

DE 11-215 - Public Service Company of New Hampshire  
Petition to Establish 2012 Energy Service Rate

DE 11-216 - Public Service Company of New Hampshire  
Petition to Establish Alternate Default Energy Service Rate

DE 11-217 - Public Service Company of New Hampshire  
Petition to Establish 2012 Stranded Cost Recovery Charge Rate

In support of this Motion, PSNH states the following:

1. On October 17, 2011, following Prehearing Conferences held in these dockets, Parties and Staff met in technical session and agreed to procedural schedules. The agreed-upon procedural schedules were submitted to the Commission by Staff Letters dated October 19, 2011. On October 20, 2011, the Commission issued Secretarial letters in these dockets

approving the procedural schedules. Each of the procedural schedules has the following identical deadlines for initial discovery:

|                       |                       |
|-----------------------|-----------------------|
| Rolling Data Requests | Through 10/28/11      |
| Data Responses        | Through 11/10/11      |
| Technical Session     | 11/16/11 at 9:00 a.m. |

2. On the last day of the Rolling Data Request period, Friday, October 28, 2011, PSNH received data request questions from Commission Staff, the Office of the Consumer Advocate, and the Conservation Law Foundation, Inc. in Docket No. DE 11-215. That same day, PSNH also received discovery questions from the Office of the Consumer Advocate in Docket No. DE 11-216. All of these data requests were received by PSNH on the last day of the “rolling” data request period; all these data requests were received after 4 p.m. on that date.

3. Rule Puc §203.09 requires that objections to data must be served in writing within 10 days following receipt of the request unless the commission specifies a different time period in a procedural schedule order. As PSNH received data requests in these dockets on October 28, 2011, the 10-day deadline for serving any objections thereto would normally be Monday, November 7, 2011.

4. Shortly after the data requests in these proceedings were received, New England was hit with a major snow storm. This storm continued through Saturday, October 29, 2011, and resulted in significant power outages throughout the Northeast. The storm knocked out power to over 237,000 of PSNH’s 500,000 retail accounts (47%). Similarly, in Connecticut, the storm affected PSNH’s affiliate, causing outages for nearly 770,000 of The Connecticut Light and Power Company’s 1.2 million customers (62%).

5. As a result of the significant damage caused by this winter storm, employees throughout the Northeast Utilities system are performing jobs related to the restoration efforts. These employees include PSNH’s regulatory relations, legal, financial, generation, and planning staffs, as well as Northeast Utilities Service Company’s (“NUSCO”) regulatory and financial staffs. Until the storm restoration effort is complete, these employees are not

available to perform their normal jobs, which include reviewing the data requests in these proceedings, and formulating objections or responses thereto.

6. The state's Emergency Operations Center has been activated as a result of the storm. Governor John Lynch stated, "It is possible power will be without power for several days, so residents who are without power should consider alternative shelter plans."

7. It is in the public interest to allow the employees of PSNH and NUSCO who would respond to the data requests in these proceedings to continue to support ongoing storm restoration efforts. In order to do so, PSNH respectfully requests that the Commission extend the November 10 due date for data responses in these proceedings for one week, until November 17, 2011. As a result of this change, the date for the Technical Session currently scheduled for November 16 will also need to be changed. PSNH suggests that this Tech Session be rescheduled for Monday, November 21, 2011. In addition, PSNH would be agreeable to changing the date for "Staff Testimony" from November 23 to November 28 to provide sufficient time to review the data responses.

8. For the reasons set forth herein, PSNH also requests that pursuant to Rule Puc 201.05, the Commission waive the normal 10-day deadline for submitting any objections to the data requests, and that per Rule 203.09(g)(1) the Commission specify that any objections be served no later than November 14, 2011.

Respectfully submitted this 31<sup>st</sup> day of October, 2011.

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**

By: 

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**CERTIFICATE OF SERVICE**

I certify that on this date I caused the attached Motion to be served pursuant to  
N.H. Code Admin. Rule Puc 203.11.

October 31, 2011

  
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