

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DE 16-674

Clifton Below

Motion to Correct Errors in PUC Determination of Avoided Costs

June 22, 2016

REQUEST for WAIVER of PUC 203.02(a)(1)

I hereby request that the Commission waive the requirements of Puc 203.02(a)(1) of its rules with regard to the requirement to file 6 paper copies of certain Excel spreadsheets electronically submitted in support of my motion to correct errors, pursuant to Puc 201.05 concerning waiver of rules and state the following in support of this request. To the extent necessary I also request that the Commission waive its rules with regard to the application of Puc 203.04 regarding the form of certain documents, such as minimum one inch margins, to allow for the 4 pages per side compact form of the attached single paper copy of printed Excel spreadsheets submitted herewith.

1. Compliance with the rule would be onerous and out of scale to the nature of this proceeding as each complete printing of the Excel spreadsheet involves approximately 2,769 pages because many tabs of the spreadsheets contain 8760 lines of data for each hour of a year.
2. PUC Commissioners and staff for whom extra paper copies are provided and who may want to examine the spreadsheets are likely to want access to the live electronic versions rather than paper copies so that formulas as well as data and computed results can be examined in an efficient manner. Formulas do not appear in printed versions of the spreadsheets and long printed versions such as these are typically more difficult to examine than live versions of spreadsheets.
3. The purpose of the rule can be satisfied by alternative methods, namely:

- a) Provision of a single paper copy, printed 4 pages to a side, makes for a single manageable paper record of how the submitted spreadsheets print for archival purposes. The paper copy is provided with an index.
 - b) A hard electronic copy recorded on a CD submitted herewith includes both copies of the live Excel spreadsheets and PDFs of the print out of each spreadsheet that matches the paper copy submitted.
 - c) Electronic copies of both the live Excel spreadsheets and PDF printouts are also being transmitted by email to the Executive Director with this request.
 - d) 7 paper copies of key printouts of summary pages from the spreadsheets were included with the Motion as Exhibit Attachments.
 - e) The Motion includes detailed explanations of the steps taken and the sources of data used to revise the spreadsheets to illustrate proposed corrections.
4. Although the Commission apparently does not normally post live Excel spreadsheets to its Docketbook and instead normally posts static PDF print-like versions, I would urge the Commission to consider doing so in this matter as the public interest will be served by allowing any other parties and the public to download live Excel spreadsheets for the purpose of examining, understanding, and questioning them, if so desired.
5. Granting this waiver will not disrupt the orderly and efficient resolution of this matter.

Respectfully submitted,

/s/ Clifton C. Below