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Subject: D.P.U. 19-07/19-AMP Revision to Discovery Requests

Attachments: Revised Attachment A - DPU 19-07 and DPU 19-AMP_7.2.2020.xlsx

Good afternoon,

On Monday, June 29, 2020, the Department of Public Utilities (“Department”) convened a procedurally based conference call with representatives of the Electric Distribution Companies (“EDCs”) to better understand the difficulties the EDCs were encountering in providing responses to the Department’s first set of information requests that were issued in this docket. During the call, Department staff were made aware that the EDCs are incapable of reporting accurate data in response to the requests made in the Attachment A issued on June 15th, Table 2, Columns J and K since they do not track such data and are incapable of accurately extracting it from other data sets. The EDCs also made Department staff aware that the formulae in Table 3, Columns H, I, N, and O were producing non-intuitive signs. Department staff has since updated the original Excel workbook issued as Attachment A on June 15th, please see “Revised Attachment A”. Thus, the Department directs the EDCs to use “Revised Attachment A” to provide their responses to the Department’s first set of information requests.

The revisions reflected in Revised Attachment A are as follows:

1. Table 1 –The sum formulae in Columns E, I, M, and Q have been updated to include “# of Municipal Aggregation Customers” (See Hearing Officer’s clarifying email dated June 18, 2020 below).
2. Table 2 – The requests in Columns J through L have been removed (these requests were associated with the calculation of incremental AMP costs).
3. Table 3 – The formulas in columns H, I, N, and O have been revised to ensure that the cells show the correct +/- values
4. Table 3 - The Instructions associated with columns F and L have been revised to eliminate reference to column L of Table 2.

Given that the current deadline for the EDCs to provide their discovery responses is Tuesday, July 7, 2020 and the Department is now altering its request, the **EDCs shall have until 5:00 p.m. on July 17, 2020 to submit their responses using the Revised Attachment A**. However, in accordance with Instruction 2 of the June 15th discovery request, the EDCs are encouraged to provide responses sooner should they be ready prior to the July 17th deadline.

Finally, the Department has not received any indication that the local gas distribution companies (“LDCs”) have encountered difficulty responding to the Department’s discovery requests nor is the Department making any alterations to the information requests directed towards the LDCs. Thus, **the deadline for LDCs to provide their responses to discovery remains 5:00 p.m. on Tuesday, July 7, 2020**.

As always, do not hesitate to contact me should you have any questions.

Best,

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Subject: D.P.U. 19-07/19-AMP Discovery Response Deadline Extension

Good afternoon,

The Department was recently made aware that certain requests made in Attachment A, Table 2 to the Department's first set of information requests issued in D.P.U. 19-07/19-AMP on June 15, 2020 have resulted in some confusion. Since the Department requires additional time to provide a meaningful clarification to the Companies and the current deadline for responses to the Department's first set of information requests is Monday, June 29, 2020, the Department hereby extends the deadline for all Companies to provide responses to the first round of discovery to Tuesday, July 7, 2020.

As always, do not hesitate to contact me should you have any questions.

Best,

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