STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

In re: Investigation of Misconduct by The Narragansett Electric Company Relating to Past Payments of Energy Efficiency Program Shareholder Incentives

DOCKET NO. 22-05-EE

MOTION TO SUSPEND PROCEDURAL SCHEDULE FOR FILING TESTIMONY

Now comes the Division of Public Utilities and Carriers ("Division") and moves the Commission to suspend the current schedule and requirement for filing testimony. As grounds therefore, the Division submits that its discovery process is ongoing. While the Company's recent response to the Division's Request For Admissions issued in August contained some of the necessary information sought, the answers necessitated additional date requests which Division issued on Friday, October 11, 2024. The answers to the requests are due November 1, 2024.

The Division submits that time will be necessary to review these answers and ascertain whether additional discovery is necessary. The Division asserts that the results of this discovery should serve to substantially streamline the later evidentiary hearings. Indeed, the results may obviate the need for pre-filed testimony on the issue of penalty applicability. The Division requests the opportunity to review the discovery prior to proceeding with any pre-filed testimony or further motion to eliminate prefiled testimony. As such, a suspension of the current procedural schedule would accomplish this objective.

The Division has inquired of counsel for the Attorney General, Rhode Island Energy (Companies) and National Gid as to whether they oppose his motion. The Attorney General is not opposed. As of this submission, the Division has not received a reply from the Companies.

Respectfully Submitted:
DIVISION OF PUBLIC UTILITIES
AND CARRIERS
By its attorney:

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CERTIFICATION OF NOTICE

A true copy of the within pleading is sent this 14th day of October 2024 to the current service lists for Docket No. 22-05-EE.

Margaret L. Hogan, Esq.