



NHPUC 30NDV16PM4:07

Michael J. Sheehan, Esq.  
Senior Counsel  
Phone: 603-216-3635  
Email: Michael.Sheehan@libertyutilities.com

November 29, 2016

**Via Electronic and First-Class Mail**

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**Re: Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities  
Request to Extend Until August 1, 2017 the Deadline for Filing EnergyNorth’s Next  
LCIRP**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth”), I enclose an original and six copies of this request pursuant to RSA 378:38-a to extend until August 1, 2017, the deadline for EnergyNorth to file its next least cost integrated resource plan (“LCIRP”).

RSA 378:38 requires each natural gas utility to file an LCIRP “within 2 years of the Commission’s final order regarding the utility’s prior plan, and in all cases within 5 years of the filing date of the prior plan.” EnergyNorth’s next LCIRP is due February 9, 2017. *See* Order No. 25,762 at 5 (Feb. 9, 2015).

The statute specifies that the LCIRP must include “an assessment of supply options including owned capacity.” RSA 378:38, III. EnergyNorth is currently planning substantial changes to its “supply options including owned capacity.” The plans, which the Company recently shared at a high level with Commission Staff and the Office of Consumer Advocate, include new sources of supply and capacity. However, the plans will not be sufficiently finalized to include in an LCIRP by the existing February deadline. If the current deadline remains, EnergyNorth would have to file an LCIRP in February then file a revised LCIRP several months later once its new plans are sufficiently developed. Thus, an LCIRP filed in February will almost immediately be obsolete and will represent wasted effort by the Company and by other parties to the extent they begin their review of that first plan. EnergyNorth seeks an extension of the

deadline to August 1, 2017, so that its LCIRP will fully describe the Company's new plans for the Commission's review.

RSA 378:38-a, titled "Waiver by Commission," states that the "commission, by order, may waive for good cause any requirement under RSA 378:38, upon written request by a utility." For the reasons stated above, EnergyNorth makes this written request to waive the February 2017 deadline and to impose a new deadline of August 1, 2017, which will allow the Company time to present its fully developed supply option plans in a single LCIRP.

Undersigned counsel provided a draft of this letter to Staff and the Consumer Advocate. Counsel for Staff indicated that Staff takes "no position" on this request; the OCA did not respond.

The Company would appreciate prompt action on this request as the existing deadline is near. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

cc: Alexander Speidel, Esq.  
Donald Kreis, Consumer Advocate