



July 20, 2022

BY E-MAIL

Daniel Goldner, Chair
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DG 19-126, Northern Utilities, Inc. d/b/a Unitil
Least Cost Integrated Resource Plan

Letter Regarding Pending Motion for Extension and Requesting a Ruling

Dear Chair Goldner:

On December 29, 2021, Northern Utilities, Inc. (“Northern” or the “Company”) filed an assented-to motion requesting, among other things, that the Commission extend the deadline for the Company’s next Least Cost Integrated Resource Plan (“LCIRP”) submission to March 31, 2023. The LCIRP is currently due on December 31, 2022. As of this writing, the Commission has not ruled on the Company’s motion.

As explained in Northern’s motion and as summarized below, the Company has provided good cause for the extension. In light of the significant amount of advance planning and work required to prepare and submit a LCIRP to the Commission, Northern respectfully requests that the Commission rule upon the Company’s motion and grant the requested extension as soon as practicable.

On July 23, 2020, the Commission issued Order No. 26,382 approving a May 27, 2020 settlement agreement (the “Settlement”) between Northern, the Commission Staff (now the Staff of the Department of Energy (“DOE”)), and the Office of the Consumer Advocate (“OCA”) relative to Northern’s then-pending LCIRP in the instant docket. Relevant to this submission, the parties to the Settlement agreed to convene a working group (“Working Group”) to discuss potential approaches and recommendations regarding potential analyses and adjustments for Northern’s next LCIRP submission.

Regarding that next submission, when the Commission approved the Settlement it directed the settling parties to file a report of Working Group discussions and any agreement reached on the content of future LCIRP filings on or by July 1, 2021. Order No. 26,382 at 7. The Commission also directed the Company to file its next LCIRP on or by July 1, 2022. *Id.*

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The parties to the Working Group subsequently engaged in numerous meetings, and also retained the services of an outside, expert consultant. To allow for time to work with the consultant, on June 17, 2021, the parties to the Working Group requested that the Commission extend the time to file a report to December 31, 2021, and further extend the deadline for the Company to file its next LCIRP to December 31, 2022. The Commission granted the request in an Order *Nisi* dated August 20, 2021. *See* Order No. 26,510 (August 20, 2021). The Order *Nisi* also waived the requirement that the LCIRP be filed within two years of the Commission Order approving the prior LCIRP. *Id.* at 4.

During the time granted, the Working Group engaged a third-party consultant, and worked diligently on this important project. Notwithstanding those efforts, the Working Group required additional time and on December 29, 2021, Northern filed a motion requesting an extension of time to file the Working Group report until March 31, 2022 and to extend the deadline for the Company's next LCIRP submission to March 31, 2023. The requested one-year period between the filing of the report and the filing of the Company's next LCIRP was consistent with the period included in the Commission's original order, Order No. 26,382, as well as the period set in the Commission's order *nisi*, Order No. 26,510.

On March 31, 2022, the Working Group report was submitted and it remains pending. By this submission, Northern requests that the Commission grant the pending request to extend the deadline for the submission of the next LCIRP to March 31, 2023. As noted above, preparing and submitting a LCIRP requires significant advance planning, and it is imperative that the Company have certainty that the due date for its next LCIRP is March 31, 2023.

As noted in the Company's December 29, 2021 motion, the Commission may grant a waiver of any requirement under RSA 378:38 for good cause, including the requirement that a utility's LCIRP be filed within two years of the Commission Order approving the prior LCIRP, and the Commission has already granted one such waiver in this case. Furthermore, even with the relatively modest additional waiver sought in this case, Northern's next LCIRP would still be filed within 5 years of its last LCIRP as required by RSA 378:38. Moreover, the DOE and the OCA assented to the requested extension of time. Based upon the materials in its December 29, 2021 motion, it is Northern's position that good cause for a waiver has been shown in this case and should be granted.

Please contact me if you have any questions concerning this filing.

Sincerely,



Matthew J. Fossum
Senior Counsel

cc: Service List