

**STATE OF NEW HAMPSHIRE**  
**PUBLIC UTILITIES COMMISSION**

**DOCKET NO. DE 17-136**

**JOINT MOTION TO AMEND ORDER 26,207 TO EXTEND SUBMISSION DATE FOR  
THE SECOND TRIENNIAL ENERGY EFFICIENCY PLAN (2021-2023)**

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities; New Hampshire Electric Cooperative, Inc.; Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc.; Liberty Utilities (Energy North Natural Gas) Corp d/b/a Liberty Utilities; and Northern Utilities, Inc.(together here as “the NH Utilities”); in conjunction with the Office of the Consumer Advocate (“OCA”) – (collectively here as the “Participating Parties”), request approval of an extension by the New Hampshire Public Utilities Commission (“Commission”) via *order nisi*, for submission of the second triennial Energy Efficiency plan for 2021-2023 (“2021-2023 Plan”). The 2021-2023 Plan is currently mandated by Commission Order No. 26,207 to be submitted July 1, 2020; the Participating Parties request that the Commission approve an extended submission date of September 1, 2020, pursuant to the authority and reasoning that follows.

Order No. 26,207 states, in relevant part, that:

[T]he second triennial plan will be developed with significant stakeholder input and sets out parameters for timelines, the role of the EERS Committee of the Energy Efficiency and Sustainable Energy (EESE) Board, and consulting help. The second triennial plan will be submitted for Commission review and approval by July 1, 2020, allowing more time for Commission review than allowed in the first triennium.

Order No. 26,207, at pg. 9 (December 31, 2018). While all stakeholders and the Participating Parties have remained steadfast in adhering to the standards set out above, circumstances that could not be foreseen or controlled by any party or stakeholder, created by the COVID-19 pandemic, have necessitated that the submission of the final 2021-2023 Plan be extended in order to maintain the required levels of participation, cooperation, and consensus. The proposed

extended submission date of September 1, 2020 was discussed at length and agreed upon at the April 20, 2020 EERS Committee Meeting, without objection.

While the COVID-19 pandemic impacts have been widespread and will most certainly have a persistent ripple effect on all aspects of the economy, those impacts have become specifically conspicuous in the development of the 2021-2023 Plan. Review and comments on the first draft along with the discussions in EERS Committee meetings have made it clear that additional time to understand market impacts, develop goals and tailor a program and plan structure to account for the pandemic is absolutely necessary in order to have the 2021-2023 Plan be a meaningful path forward for the success of the energy efficiency programs for the next three years.

The Participating Parties are in unanimous agreement that extending the submission deadline for the final draft of the 2021-2023 Plan is the most reasonable course of action, will not prejudice any parties to the Plan but rather will benefit all stakeholders involved by enabling the crafting of a 2021-2023 Plan that incorporates the best and most complete information affecting the contents of the 2021-2023 Plan. Therefore, the Participating Parties request that the Commission, pursuant to its authority under RSA 365:28 to amend any Commission Order, do so here by issuing an *order nisi* to provide the relief sought, as there are no contested issues to be heard, and as all parties are in agreement as to the course of action.

WHEREFORE, the Participating Parties respectfully request that the Commission:

EXTEND the submission date of the final draft of the 2021-2023 Plan from July 1, 2020 to September 1, 2020; and

GRANT such other relief that is just and equitable.

Respectfully submitted this 5<sup>th</sup> day of June 2020, by the Participating Parties:

**NEW HAMPSHIRE OFFICE OF THE CONSUMER ADVOCATE**

By:  \_\_\_\_\_  
D. Maurice Kreis, Esq.  
Consumer Advocate

Date: June 4, 2020

**UNITIL ENERGY SYSTEMS, INC.**

By: \_\_\_\_\_  
Patrick Taylor, Esq.  
Senior Counsel

Date: \_\_\_\_\_

**LIBERTY UTILITIES (ENERGY NORTH NATURAL GAS) CORP D/B/A LIBERTY UTILITIES  
LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. D/B/A LIBERTY UTILITIES**

By: \_\_\_\_\_  
Michael Sheehan, Esq.  
Senior Counsel

Date: \_\_\_\_\_

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY**

By: \_\_\_\_\_  
Jessica A. Chiavara, Esq.  
Counsel

Date: \_\_\_\_\_

**NEW HAMPSHIRE ELECTRIC COOPERATIVE, INC**

By: \_\_\_\_\_  
Mark W. Dean, Esq.  
Counsel

Date: \_\_\_\_\_

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Consumer Advocate

Date: \_\_\_\_\_

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By: \_\_\_\_\_  
Patrick Taylor, Esq.  
Senior Counsel

Date: \_\_\_\_\_

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LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. D/B/A LIBERTY UTILITIES**

By: \_\_\_\_\_  
Michael Sheehan, Esq.  
Senior Counsel

Date: \_\_\_\_\_

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY**

By: \_\_\_\_\_/s/ Jessica A, Chiavara \_\_\_\_\_  
Jessica A. Chiavara, Esq.  
Counsel

Date: \_\_6/5/2020\_\_\_\_\_

**NEW HAMPSHIRE ELECTRIC COOPERATIVE, INC**

By: \_\_\_\_\_  
\_ Mark W. Dean, Esq.  
Counsel

Date: \_\_\_\_\_

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D. Maurice Kreis, Esq.  
Consumer Advocate

Date: \_\_\_\_\_

**UNITIL ENERGY SYSTEMS, INC.**

By: \_\_\_\_\_  
Patrick Taylor, Esq.  
Senior Counsel

Date: \_\_\_\_\_

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LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. D/B/A LIBERTY UTILITIES**

By: \_\_\_\_\_  
Michael Sheehan, Esq.  
Senior Counsel

Date: \_\_\_\_\_

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY**

By: \_\_\_\_\_  
Jessica A. Chiavara, Esq.  
Counsel

Date: \_\_\_\_\_

**NEW HAMPSHIRE ELECTRIC COOPERATIVE, INC**

By:  \_\_\_\_\_  
Mark W. Dean, Esq.  
Counsel

Date: 6/4/20

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By: \_\_\_\_\_  
D. Maurice Kreis, Esq.  
Consumer Advocate

Date: \_\_\_\_\_

**UNITIL ENERGY SYSTEMS, INC.**

By: \_\_\_\_\_  
Patrick Taylor, Esq.  
Senior Counsel

Date: \_\_\_\_\_

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LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. D/B/A LIBERTY UTILITIES**

By:         /s/ Michael Sheehan          
Michael Sheehan, Esq.  
Senior Counsel

Date:         6/4/2020        

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY**

By: \_\_\_\_\_  
Jessica A. Chiavara, Esq.  
Counsel

Date: \_\_\_\_\_

**NEW HAMPSHIRE ELECTRIC COOPERATIVE, INC**

By: \_\_\_\_\_  
Mark W. Dean, Esq.  
Counsel

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By: \_\_\_\_\_  
D. Maurice Kreis, Esq.  
Consumer Advocate

Date: \_\_\_\_\_

**UNITIL ENERGY SYSTEMS, INC.  
NORTHERN UTILITIES, INC.**

By: /s/ Patrick H. Taylor, Esq.  
Patrick Taylor, Esq.  
Senior Counsel

Date: 6/5/20

**LIBERTY UTILITIES (ENERGY NORTH NATURAL GAS) CORP D/B/A LIBERTY UTILITIES  
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Michael Sheehan, Esq.  
Senior Counsel

Date: \_\_\_\_\_

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Counsel

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Counsel

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