

STATE OF NEW HAMPSHIRE

CONSUMER ADVOCATE
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June 1, 2022

New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301

Re: Docket No. DG 17-152
Energy North Natural Gas Corp. d/b/a Liberty
Least Cost Integrated Resource Plan

To the Commission:

Please treat this letter as the response of the Office of the Consumer Advocate (“OCA”) to the Commission’s request that parties file summaries of their positions on or before June 1, 2022, in anticipation of the status conference scheduled in this docket for June 21, 2022.

The position of the OCA can be succinctly stated. It would be absurd, and manifestly inconsistent with the legislative purpose reflected in RSA 378:37 *et seq.*, for the Commission to take the step of approving now a least-cost integrated resource plan (LCIRP) that was filed nearly five years ago, has been overtaken by subsequent events, and covers a planning period that expires on October 31, 2022 – just five months from now. There is no longer any pretense that, as to this LCIRP, “the process of review is proceeding in the ordinary course” pursuant to RSA 378:40.

Therefore, Liberty has a problem: As clearly stated in RSA 378:40, the Commission is statutorily prohibited from approving *any* “rate change” for this utility because no approved LCIRP is on file. It is not the responsibility of the OCA to solve this problem, although we have made every effort to be helpful to Liberty and the other parties in bringing this proceeding to a satisfactory conclusion. The question of what to do now is, presumably, fertile ground for discussion on June 21. We look forward to participating.

Sincerely,

A handwritten signature in blue ink, appearing to read "DKreis".

Donald M. Kreis
Consumer Advocate

cc: Service List