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NHPUC 28.IIM 19-ver58

June 28, 2019

Via Electronic Mail and Hand Delivery

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

Re: Docket No. DG 17-152; Liberty Utilities (EnergyNorth Natural Gas) Corp. Least Cost Integrated Resource Plan

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., enclosed for filing in the above matter please find an original and six copies of the Direct Testimony of Paul J. Hibbard, the Direct Testimony of Sherrie Trefry, and the Direct Testimony of Eric M. Stanley.

In Order No. 26,225 at 7 (Mar. 13, 2019), the Commission stated:

Accordingly, we direct Liberty to submit a supplemental filing, including supporting testimony, to address each of the specific elements required under RSA 378:382 and RSA 378:39 that are not already addressed in its LCIRP, with adequate sufficiency to permit the Commission's assessment of potential environmental, economic, and health-related impacts of each option proposed in the LCIRP, as required by RSA 378:39.

(Emphasis added.) In response to the Order, on April 30, 2019, the Company filed the Direct Testimony of William Killeen.

At a subsequent technical session held May 23, Staff and others acknowledged that the standards governing the revised IRP statute were not clear, and that EnergyNorth was the first natural gas utility expected to meet these new and undefined standards. Nonetheless, the parties expressed their views that Mr. Killeen's testimony was not sufficient to satisfy whatever the new standards would be under the above directive in Order No. 26,225. Staff and some others thus suggested that EnergyNorth supplement Mr. Killeen's testimony. Without conceding the argument that Mr. Killeen's testimony does not meet the standard, Liberty agreed to file the enclosed additional testimony from witnesses with different expertise.

To afford the parties a reasonable opportunity to seek discovery on this testimony, the Company also proposes modest changes to the procedural schedule to allow ample time for

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discovery, but keeping the currently scheduled hearing dates of November 21, 2019. The proposed schedule (with the changes highlighted), the current schedule, and the DG 17-198 schedule for comparison, are in the table below.

	Current 17-152 schedule	Proposed 17-152 schedule	Current 17-198 schedule
Technical Session	6/21	6/21	6/20
Supplemental filing		6/28	
Discovery	6/21 - 7/12 [responses due 7/26]	6/28 – 7/16 [responses due 7/30]	
Staff/OCA/intervenor testimony	8/9	8/12	7/31
Discovery	8/9 – 8/16	<mark>8/12 – 8/19</mark>	7/31 – 8/14
Final date for responses	8/27	<mark>8/30</mark>	8/27
Technical Session	8/30	Week of 9/2	8/28 – 8/29
Liberty rebuttal testimony	9/27	9/27	9/20
Discovery	9/30 - [10/4]	9/30 – [10/4]	9/30
Final date for responses	10/18	10/18	10/11
Technical Session/ settlement conference	10/24	10/24	10/22 – 10/23
Hearing	11/21 – 11/22	11/21 – 11/22	12/4 – 12/5

The Company respectfully asks the Commission to accept the enclosed testimony and to approve the schedule proposed above.

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Please include the following on the Service List for this docket:

• Paul J. Hibbard Paul. Hibbard@analysisgroup.com

• Sherrie Trefry STrefry@vhb.com

• Eric M. Stanley Eric.Stanley@libertyutilities.com

Thank you.

Sincerely,

Michael J. Sheehan

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Enclosures cc: Service List