



June 17, 2021

**Via Electronic Mail**

Debra A. Howland  
Executive Director and Secretary  
N.H. Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, N.H. 03301

**RE: DG 19-126: Request for Extension of Time to File Working Group Report**

Dear Ms. Howland:

In a Settlement Agreement submitted to the Commission in the above-referenced docket on May 27, 2020, Northern Utilities, Inc. (“Unitil” or the “Company”), the Commission Staff, and the Office of the Consumer Advocate (“OCA”) agreed to convene a working group to discuss potential approaches and recommendations regarding the assessment of environmental, economic, and health-related impacts in least cost integrated planning as required under RSA 378:37-40. The settling parties agreed to provide Working Group recommendations to the Commission for an order providing guidance regarding expectations under RSA 378:37-40 for future least cost integrated plans (“LCIRPs”).

The Commission approved the Settlement Agreement and 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 before July 1, 2021. DG 19-126, *Northern Utilities, Inc.*, Order No. 26,382 at 7 (July 23, 2020). The Commission further directed the Company to file its next LCIRP on or before July 1, 2022. Id.

The settling parties have engaged in numerous productive meetings over the course of the last eleven months. During those meetings, the parties have discussed a wide range of potential approaches to incorporating additional considerations into the Company’s LCIRP to ensure consistency with RSA 378:37-40. Through a collaborative process, the settling parties have refined these approaches into a working outline of potential recommendations. However, the parties now agree that they, and the Commission, will benefit from the input of a third party expert consultant with respect to certain subject areas. The parties are in the process of finalizing a scope of work to be included in a request for proposals to be issued in

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the next several weeks.

The settling parties hereby request that the Commission extend the time to file a Working Group report to December 31, 2021, and further extend the deadline for the Company to file its next LCIRP to December 31, 2022. The Commission may grant a waiver for good cause of any requirement under RSA 378:38, including the requirement that a utility's LCIRP be filed within two years of the Commission Order approving the prior LCIRP.<sup>1</sup> RSA 378:38-a; DE 15-248, *Pub. Serv. Co. of N.H. d/b/a Eversource Energy*, Order 26,262 at 5 (June 14, 2019) ("We read the plain language of RSA 378:38-a as allowing the Commission to waive for good cause . . . the timelines for filing."). Good cause to extend the deadlines for filing Working Group recommendations and the Company's next LCIRP exists in this case. The additional time will enable the settling parties to develop a robust Working Group report for the Commission's consideration, and will provide the Company the opportunity to incorporate any Working Group recommendations adopted by the Commission into its next LCIRP. This will ultimately result in a more informative and efficient adjudication of the LCIRP before the Commission. Moreover, the settling parties, who are the only parties to the above-referenced docket, agree that such additional time to file the Working Group report and the Company's next LCIRP is appropriate. There will be no prejudice to any party by granting the requested extensions.

The OCA assents to the extension of time to file the Working Group report and the LCIRP. The Staff assents to the extension of time to file the Working Group report and takes no position on the request to extend the deadline for filing the LCIRP. Thank you for your consideration of this reasonable request for an extension of time. Please do not hesitate to contact me should you have any questions regarding this matter.

Regards,

A handwritten signature in black ink, appearing to read "Patrick H. Taylor", with a long horizontal flourish extending to the right.

Patrick H. Taylor

cc: Service List

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<sup>1</sup> Though this deadline would be more than two years following the Commission's prior order approving the Company's last LCIRP, it is within five years of the filing of the Company's last LCIRP. RSA 378:38.