



March 31, 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.
Least Cost Integrated Resource Plan

Working Group Report

Dear Chair Goldner:

On July 23, 2020, the Commission issued Order No. 26,382 approving a May 27, 2020 settlement agreement (the "Settlement") between Northern Utilities, Inc. ("Northern" or the "Company"), 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 Least Cost Integrated Resource Plan ("LCIRP") submission 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 the assessment of environmental, economic, and health-related impacts in least cost integrated planning and to include the results of that analysis in a report to be filed with the Commission.

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 before July 1, 2021. Order No. 26,382 at 7. The Commission further directed the Company to file its next LCIRP on or before July 1, 2022. *Id.*

The parties to the Working Group subsequently engaged in numerous productive meetings over the course of many months. In the course of those discussions, the parties agreed they would benefit from the input of a third-party expert consultant with respect to certain subject areas. To allow for time to issue a Request for Proposals ("RFP") and work with a 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.

Matthew J. Fossum
Senior Counsel
fossumm@unitil.com

6 Liberty Lane West
Hampton, NH 03842

T 603.773.6537
www.unitil.com

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 Company's request remains pending before the Commission.

While that request has remained pending, the Working Group continued its work with the intent of producing a final report for submission with the Commission. That work continued through the time of transition of responsibilities and personnel between the Commission and the newly-created DOE including through more than 20 meetings in 2021 and into the early part of 2022. Due in part to the transition of the DOE, Northern understands that despite its participation in the Working Group, the DOE was not prepared to provide its final agreement to the Working Group report as of the date of filing and may provide a supplemental statement at a later date.

Subject to the caveat noted above, enclosed with this letter please find the final report of the Working Group relative to Northern's LCIRP. In the assessment of the parties, this report and the recommendations within it provide a reasonable road map for Northern and other parties to understand the requirements and expectations of the LCIRP statute as it exists, and the incremental adjustments that that Northern will make to its planning and its reporting to better align with the law and improve its analysis of its gas supply and distribution requirements for its New Hampshire system.

The Working Group requests that the Commission accept this report and, as might be needed, approve its recommendations for inclusion in Northern's next LCIRP. As noted, Northern's request to extend the date of its next LCIRP filing to March 31, 2023 remains pending and Northern requests that as part of accepting this report, the Commission also confirm the extended date for that LCIRP submission.

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

Sincerely,



Matthew J. Fossum
Senior Counsel

cc: Service List