

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

DOCKET NO. DG 19-126

Northern Utilities, Inc.

2019-2024 Integrated Resource Plan

**Motion for Extension of Time to File Working Group Report and
Least Cost Integrated Resource Plan**

NOW COMES Northern Utilities, Inc. ("Northern" or "the Company") and, pursuant to N.H. Admin. Rule Puc 203.07, respectfully moves the New Hampshire Public Utilities Commission (the "Commission") to extend the time to file a Working Group report in the above-captioned docket until March 31, 2022, and further extend the deadline for the Company to file its next LCIRP to March 31, 2023. The Department of Energy and the Office of the Consumer Advocate assent to the relief requested in this motion.

In support of this Motion, Northern states as follows:

1. 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 ("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").

2. 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.

3. The settling parties subsequently engaged in numerous productive meetings over the course of approximately eleven months. During those meetings, the parties 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 refined these approaches into a working outline of potential recommendations. However, the settling parties agreed that they, and the Commission, 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, the settling parties requested 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.

4. The Commission granted the settling parties' request in an Order *Nisi* dated August 20, 2021. DG 19-126, *Northern Utilities, Inc.*, Order No. 26,510 (August 20, 2021). The Order *Nisi* waived the requirement that a utility's LCIRP be filed within two years of the Commission Order approving the prior LCIRP. Id. at 4.

5. Since the time that the settling parties submitted their request for an extension of time to file a Working Group report, they have issued an RFP; hired a third-party consultant, DNV-GL, to assist in developing the Working Group report; and participated in multiple meetings with DNV-GL to further discuss resource planning practices and options in light of, among other things, the statutory directives in RSA 378:37-40 and the Company's resource planning requirements. DNV-GL has, to date, produced two draft interim reports for the settling

parties' consideration, and expects to produce a third draft report before the end of the year.

These reports will inform the Working Group report that the settling parties ultimately submit to the Commission.

6. The settling parties have worked diligently on this important project and have made substantial progress towards a Working Group report that the settling parties can submit for the Commission's consideration. Notwithstanding the diligent efforts of the settling parties and DNV-GL, the settling parties require a short amount of additional time to develop and finalize the Working Group report. Moreover, the Company anticipates that the Commission will require time to review the report, and that the Company's next IRP will incorporate significant new components and information. Thus, it will cause undue hardship and inconvenience to the Company and the parties if the request for a brief extension is not granted. Puc 202.04.

7. As such, the parties request that the Commission extend the time to file a Working Group report to March 31, 2022, and further extend the deadline for the Company to file its next LCIRP to March 31, 2023.

8. 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. 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."). The Commission already waived this requirement in this docket, noting:

Granting the working group additional time to complete a report on its discussions and any agreement reached on the content of future LCIRP filings, as well as granting Until the opportunity to produce its next LCIRP giving due consideration to those discussions, agreements, and any Commission guidance issued in response to the report may result in a more informative and efficient adjudication of Unutil's future LCIRP filings under RSA 378:39.

DG 19-126, *Northern Utilities, Inc.*, Order No. 26,510 at 4 (August 20, 2021). Though the extended 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.

9. Good cause exists in this case to further extend the deadlines for filing Working Group recommendations and the Company's next LCIRP. The additional time will enable the settling parties to continue developing 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 other members of the Working Group, the Office of the Consumer Advocate and the Department of Energy, assent to the relief requested in this motion. The requested extension will not unduly delay these proceedings, and there will be no prejudice to any party by granting the requested extensions. Puc 202.04.

WHEREFORE, Northern respectfully requests that the Commission:

- A. Extend the time to file a Working Group report to March 31, 2022;
- B. Extend the deadline for the Company to file its next LCIRP to March 31, 2023;
and
- C. Grant such additional relief as is just and appropriate.

Dated at Hampton, NH on this 29th day of December, 2021.

Respectfully submitted,

NORTHERN UTILITIES, INC.

By Its Attorney,



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