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February 28, 2022

Via Electronic Mail Only

Chairman Daniel Goldner
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: Docket No. DE 21-004; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Least Cost Integrated Resource Plan**

Dear Chairman Goldner:

On behalf of Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, and in response to the Commission's February 24, 2022, order, below is a proposed procedural schedule to accommodate a revised filing date for the proposed NWS, and to allow for continued work on other aspects of the LCIRP filing.

Liberty conferred with the Department of Energy and the Office of the Consumer Advocate and both assent to this proposed schedule.

DRs to Liberty, Set 6	March 24, 2022
Responses Set 6	April 7, 2022
Technical Session	April 15, 2022
<u>NWS Proposal filing</u>	June 1, 2022
DRs to Liberty, Set 7	June 6, 2022
Responses Set 7	June 20, 2022
Technical Session	June 30, 2022
DRs to Liberty, Set 8	July 8, 2022

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Responses Set 8	July 22, 2022
Technical Session	July 28, 2022
Energy/OCA/Intervenor Testimony	August 16, 2022
DRs to Energy/OCA/Intervenors	August 23, 2022
Responses	September 7, 2022
Technical Session/Settlement Conference	September 19, 2022
Technical Session/Settlement Conference	September 20, 2022
Hearing Dates, Two full days	October 2022

The order asked that the Company provide “good cause” for requesting a new NWS filing date beyond March 16, 2022. As the above schedule contains a June 1 date for filing the NWS proposal, the Company’s “good cause” for that extra time follows.

The NWS concept that was included in the original LCIRP filed in this docket in January 2021 addressed *supply* concerns in the Company’s Charlestown/Bellows Falls area. Based on those supply concerns, and after meeting with Energy and the OCA in the summer of 2021, the Company selected that project to develop a comprehensive NWS solution to those supply issues to be filed for Commission review. The Company planned to file that proposal by last week’s deadline.

Over the recent months, however, the Company has seen a dramatic increase in *reliability* issues in the same Charlestown/Bellow Falls area. Although this area has had reliability issues over the past two to three years, the data collected over the recent 4-6 months have painted a dire reliability picture.

The Company elected to pause the finishing touches on the nearly complete NWS *supply* solution to more closely examine the *reliability* problems to make sure the NWS proposal that was presented for review addressed both issues in a comprehensive manner. The Company believes that only addressing supply problems and overlooking the obvious reliability issues does not serve customers in a least cost approach nor does it provide a meaningful solution for the area.

The Company’s engineers are currently working through the reliability data to determine the best way to develop an integrated NWS to address both problems. Any NWS projects arising from this analysis would be at least 2-3 years in the future, thus there is time to accommodate the modest extension requested here and still provide the parties and the Commission ample time to review and approve.

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Again, the Company discussed these issues with both Energy and the OCA, and both support the schedule proposed above.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Sheehan", with a stylized, cursive script.

Michael J. Sheehan

cc: Service List