

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

DE 21-073

LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. d/b/a LIBERTY UTILITIES

2020 Annual Storm Fund Report

**DEPARTMENT OF ENERGY'S REQUEST TO ENLARGE TIME TO INVESTIGATE
2020 ANNUAL STORM FUND REPORT UNTIL JUNE 16, 2022**

NOW COMES the New Hampshire Department of Energy (DOE) and asks the Commission to grant the DOE additional time until June 16, 2022, in which to investigate and file a Report regarding Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (Liberty or the Company)'s 2020 Annual Storm Fund Report (2020 ASFR).

In support of this motion, the DOE states as follows:

1. On January 13, 2022, the Commission granted the DOE's motion for additional time and set a filing deadline of May 5, 2022. *See Commission's Procedural Order Re: Motion to Enlarge Time* (January 13, 2022).
2. In light of the press of other business, the DOE was unable to finish its report in this docket on May 5, 2022, and requires additional time to complete its work and file a report.
3. DOE's report is likely to propose further procedural steps. In particular, Liberty's 2019 ASFR, filed in Docket No. DE 06-107, remains contested. In that earlier docket, pending adjudication, DOE recommended that approximately \$700,000 be disallowed. DOE anticipates that similar issues will be contested and that recommended disallowances will be made in the instant docket.
4. Accordingly, DOE asks for additional time in which to complete its review and investigation of Liberty's 2020 ASFR, and in which to file DOE's report, until June 16, 2022.

5. If the Commission were to deny this request for additional time to review and investigate the 2020 ASFR, the DOE would be caused undue hardship. The press of other business would make a more abbreviated extension untenable, and the matters at issue require attention, such that further DOE review should not be deemed moot. Granting the extension will not unduly delay the proceeding or adversely affect the rights of any party, because the additional time requested is minimal, and issues are similar to issues that are still pending adjudication in Docket. No. DE 06-107 (2019 ASFR). *See* N.H. Code of Administrative Rules Puc 202.04. For the same reasons, DOE should be granted waiver of its late filing, and the Commission should find that waiver is in the public interest. *See* PUC 201.05.

6. Liberty, by and through counsel Michael Sheehan, does not object to the DOE's request for additional time in which to review and investigate Liberty's 2020 ASFR, and in which to file DOE's Report until June 16, 2022. Similarly, Liberty does not object to the Commission waiving DOE's late filing.

7. If the DOE's review and investigation of Liberty's 2020 ASFR is completed sooner than anticipated, DOE's final report will be filed promptly thereafter.

WHEREFORE, the DOE respectfully asks that the Commission:

- A. GRANT the DOE's request to enlarge the time for its review and investigation of Liberty's 2020 ASFR, and in which to file DOE's report until June 16, 2022;
- B. GRANT the DOE's request for waiver of late filing pursuant to Puc 201.05; and
- C. GRANT such other and further relief as is equitable and just.

Respectfully submitted,

Date: May 11, 2022

/s Mary E. Schwarzer

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Certificate of Service

I hereby certify that on May 11, 2022, a copy of this objection has been electronically forwarded to the service list.

Mary E. Schwarzer

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