

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

DOCKET NO. IR 22-076

Electric Distribution Utilities

Investigation of Whether Current Tariffs and Programs are Sufficient to Support Demand Response and Electric Vehicle Charging Programs

JOINT MOTION FOR EXTENSION OF TIME TO FILE INITIAL COMMENTS

NOW COMES Unitil Energy Systems, Inc. (“Unitil”), Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”), and Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (“Liberty”) (collectively, the “EDCs”) and, pursuant to N.H. Admin. Rules Puc 202.04 and Puc 203.07, respectfully moves the New Hampshire Public Utilities Commission (the “Commission”) to grant a one-week extension of time to file Initial Comments in the above-captioned docket.

In support of this Motion, the EDCs state as follows:

1. On November 15, 2022, the Commission opened the above-captioned investigation to consider adoption of the standards related to “Demand response practices” and “Electric vehicle charging programs” established in 16 U.S.C. §§ 2621(d)(20) and (d)(21). In its Order of Notice, the Commission set forth an extensive and non-exclusive list of issues that it intended to consider in the course of this docket, including issues related to demand response and demand flexibility, the electronic data interchange standard, a transactive retail electricity market, and electric vehicle charging.

2. Following a prehearing conference on February 2, 2023, the Commission issued a Prehearing Order directing participants to “confer and develop a procedural schedule with the goal of presenting information and recommendations to the Commission.” The EDCs, with the

assent of several other participants, submitted a proposed procedural schedule on February 17, 2023. On February 21, 2023, the Commission issued a Procedural Order approving the following schedule:

Initial Comments from all participants March 21, 2023
Reply Comments from all participants May 2, 2023
Final Comments from all participants June 13, 2023
Status Conference June 15, 2023, at 9:00 a.m.

3. The EDCs have been working diligently to prepare Initial Comments in compliance with the Procedural Order issued by the Commission. However, a powerful Nor'easter, Winter Storm Sage, brought a significant amount of heavy snow and strong winds to the region during the week of March 13, 2023. The storm caused outages in several of the EDCs' service territories in New Hampshire and in other New England states.

4. Many of the personnel and subject matter experts that have been contributing to the Initial Comments were activated for storm duty during the week of March 13, 2023 to prepare for the storm and manage operations during the course of the storm and related restoration activities. This entailed long shifts, in some cases overnight shifts, with little if any opportunity to continue working on the Initial Comments.

5. The EDCs respectfully request that the Commission grant a one-week extension of time to March 28, 2023 to submit Initial Comments in this docket. Good cause exists for the requested extension, as circumstances beyond the control of the EDCs have prevented them from being able to work on the comments during the week of March 13, 2023. As a result of the storm, the EDCs will not be able to provide a full set of Initial Comments by the currently established deadline of March 21, 2023. As such, the EDCs will be subject to undue hardship or inconvenience unless the request is granted. Puc 202.04(c)(1).

6. In the interests of equity and fairness, the EDCs propose that the one-week extension of time to file Initial Comments be extended to all participants in the docket. The EDCs also propose a corresponding extension of time to file Reply Comments to May 9, 2023, while leaving the deadline for Final Comments in place at June 13, 2023. This will ensure that participants still have six weeks to prepare Reply Comments, and over a month to prepare Final Comments. The EDCs believe that the proposed extension will not unduly delay the proceeding or adversely affect the rights of any participant. Puc 202.04(c)(2).

7. The EDCs have made a good faith attempt to gain the consent of other participants to this Docket. As of this writing, the New Hampshire Department of Energy, Clean Energy New Hampshire, and Community Power Coalition of NH have indicated their assent to the requested extension of time. Participant WeaveGrid has indicated that it does not object to the request.

8. The EDCs have articulated good cause for the brief extension of time requested in this motion. Absent the extension, the EDCs will be subject to undue hardship or inconvenience, and granting the extension will not unduly delay this proceeding or adversely affect the rights of other participants.

WHEREFORE, the EDCs respectfully request that the Commission:

- A. Grant an extension of time for participants to file Initial Comments on March 28, 2023;
- B. Grant a corresponding extension of time to file Reply Comments to May 9, 2023; and
- C. Grant such additional relief as is just and appropriate.

Dated this 17th day of March, 2023.

Respectfully submitted,



Patrick H. Taylor
Chief Regulatory Counsel
Unitil Service Corp.
6 Liberty Lane West
Hampton, NH 03842
603-773-6544
taylorp@unitil.com



Jessica A. Chiavara
Senior Counsel, Eversource Energy
780 N. Commercial Street, P.O. Box 330
Manchester, NH 03101
(603) 634-2972
Jessica.chiavara@eversource.co



Michael Sheehan
Director, Legal Services, Liberty Utilities
(603) 724-2135
Michael.Sheehan@libertyutilities.co

CERTIFICATE OF SERVICE

I certify that I have caused copies of the above to be served on the service list in Docket No. IR 22-076.

Dated: March 17, 2023.



Patrick H. Taylor