

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DE 23-003

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

Proposed Purchase of Receivables Program

**Motion to Extend until January 12 the Deadline for Filing Comments or Exceptions to the
Hearing Examiner's Report and Proposed Order**

Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, respectfully moves the Commission pursuant to Puc 202.04 and Puc 203.7 to extend until January 12, 2024 (from January 2, 2024) the deadline for filing comments or exceptions to the Hearing Examiner's report and recommended order.

In support of this motion, Liberty states as follows:

1. The Commission's September 1, 2023, Procedural Order assigned a member of the Commission's staff to conduct a hearing, report the facts, and make recommendations in this matter pursuant to RSA 363:17 (the "September 1 Order"). The September 1 Order also provided an opportunity for the parties to file comments or exceptions to the Hearing Examiner's report and recommendation within 10 calendar days.
2. The Hearing Examiner issued a report and recommended order on December 22, 2023. Pursuant to the September 1 Order and Puc 202.03(b), comments or exceptions are thus due January 2, 2024.
3. Liberty respectfully submits that an extension of time until Friday, January 12, 2024, is appropriate due to the complexity of the matters at issue and the holidays between the issuance

of the Hearing Examiner's report and recommendations and the deadline to submit comments and exceptions. The holidays are relevant because key personnel unavailable during this period to properly review, evaluate, and develop comments and any exceptions to the Hearing Examiner's report and recommendations.

4. The requested extension will not unduly delay the proceeding or adversely affect the rights of any party because the requested extension is for a brief period, there is no deadline for the Commission to issue an order, and there will be a second phase to this proceeding. Rather, a brief extension will ensure the Commission receives fully developed and thoughtful comments.
5. Liberty has contacted the other parties in a good faith attempt to gain their assent for the extension. The NRG Retail Companies, Inc. and the Community Power Coalition of New Hampshire assent to the relief sought. The responsible Department of Energy attorney is out of the office this week and did not respond to a request for DOE's position.
6. Finally, Liberty notes that parties in the related dockets have filed similar requests. *See* Docket No. DE 23-002 (Unitil) and Docket No. DE 23-004 (Eversource).
7. Given the current January 2, 2024, deadline, Liberty requests expedited consideration of this motion.

WHEREFORE, Liberty respectfully requests that the Commission:

- A. Extend until January 12, 2024, the deadline for filing comments or exceptions to the Hearing Examiner's report and proposed order; and
- B. Grant such other relief as is just and reasonable and consistent with the public interest.

Respectfully submitted,
Liberty Utilities (Granite State Electric) Corp., d/b/a
Liberty

By its Attorney,



Date: December 28, 2023

By:

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Certificate of Service

I hereby certify that on December 28, 2023, a copy of this motion has been electronically forwarded to the service list.



Michael J. Sheehan