

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DG 19-126

NORTHERN UTILITIES, INC.

2019-2024 Integrated Resource Plan

Order Following Working Group Report

O R D E R N O. 26,664

August 8, 2022

In this order, the Commission modifies the Working Group recommendations, gives guidance on the contents of future Least Cost Integrated Resource Plans (LCIRP), and extends the date for Northern to file its next LCIRP until March 31, 2023.

I. PROCEDURAL HISTORY

As part of the May 27, 2020, Settlement Agreement (Settlement) among Northern Utilities, Inc. (Northern), the Office of the Consumer Advocate (OCA), and the Commission Staff (now the Staff of the Department of Energy (DOE)) (collectively the "Settling Parties"), the Settling Parties agreed to convene a working group (Working Group) to discuss, among other things, potential approaches and recommendations regarding the assessment of environmental, economic, and health-related impacts in LCIRPs, as required under RSA 378:37–40 (the "LCIRP Statute"). The Settling Parties agreed to provide Working Group recommendations to the Commission proposing guidance regarding expectations under the LCIRP Statute for future LCIRPs.

The Commission issued Order No. 26,382 (July 23, 2020), approving the Settlement Agreement and imposing a deadline of July 1, 2021, for the Settling Parties to file a report of Working Group discussions and any agreement reached on the content of future LCIRP filings. Order No. 26,382 also set a deadline of July 1, 2022, for Northern to file its next LCIRP. On June 17, 2021, Northern, on behalf of the

Settling Parties, requested an extension of time to file the Working Group report to December 31, 2021, and an extension of the deadline for Northern to file its next LCIRP to December 31, 2022.

In Order No. 26,510 (August 20, 2021), the Commission granted the extension request and waived the two-year requirement under RSA 378:38-a to allow Northern's subsequent LCIRP filing beyond the two-year filing deadline on or before December 31, 2022. On December 29, 2021, Northern, on behalf of the Settling Parties, requested an additional extension to March 31, 2022, to file the Working Group report, and to March 31, 2023, to file its next LCIRP. The Commission has not yet acted on Northern's December 29, 2021, request for an extension.

Following the issuance of a Request for Proposals (RFP), the parties selected third-party consultant DNV-GL Energy Insights USA Inc. to assist in developing a Working Group recommendation. On March 31, 2022, Northern filed the Working Group report.

II. WORKING GROUP REPORT

The following summarizes the principal conclusions, interpretations, and recommendations contained in the Working Group Report.

A. Statutory Interpretation

The Working Group found that LCIRPs should, to the extent practicable, reflect the energy policy of the State of New Hampshire as expressed in RSA 378:37. According to the Working Group, some of the requirements contained in RSA 378:38 are inapplicable to natural gas utilities, e.g., "an assessment of the benefits and costs of 'smart grid' technologies, and the institution or extension of electric utility programs designed to ensure a more reliable and resilient grid to prevent or minimize power outages." RSA 378:38, IV. Nonetheless, the Working Group concluded that Northern is

either addressing the requirements of RSA 378:38 in its current planning processes or can take recommended incremental steps to enhance its planning processes in a manner consistent with the LCIRP Statute.

B. Statutory Criteria for Evaluation of LCIRPs

i. Forecast of Future Demand RSA 378:38, I

The Working Group concludes that Northern's LCIRPs have customarily included a forecast of future demand for the Company's service area, including any reduction due to demand-side programs.

ii. Assessment of Demand-side Energy Management Programs (RSA 378:38, II)

As set forth in RSA 378:37, the State's energy policy requires utilities to assess demand-side resources. While RSA 378:38, II requires that a utility provide an assessment of demand-side energy management programs, including conservation, efficiency, and load management programs, it does not specify the source or scope of programs to be assessed. Northern participates fully in the Commission's Energy Efficiency (EE) proceedings and accounts for expected demand reductions from those programs in its planning process. The Working Group recommends that Northern evaluate demand-side resources beyond the EE programs as potential resource additions in future LCIRP submissions.

iii. Assessment of Supply Options (RSA 378:38, III)

For purposes of the Company's next LCIRP, the Working Group recommends that the Company seek to expand potential supply options by identifying renewable supply resources, such as Renewable Natural Gas (RNG), including biogas resources. The Working Group also supports exploring Certified Gas (CG), which is natural gas that has been certified to have been produced with low emissions.

iv. Assessment of Distribution and Transmission Requirements (RSA 378:38, IV)

RSA 378:38, IV requires a review of distribution and transmission requirements, including an assessment of the benefits and costs of certain technologies and programs that are, on their face, inapplicable to Northern. Regardless, the Working Group found that assessments of Non-Pipeline Alternatives (NPAs) that might delay future distribution system costs or increase the flexibility of other potential resource options would be appropriate to consider in assessing this component. The Working Group recommends that in its assessment of this element, the Company include in its next LCIRP a description of any NPAs it has evaluated or planned.

v. Assessment of Integration and Impact on Compliance with the Clean Air Act and Other Environmental Laws and Regulations (RSA 378:38, V)

The Working Group recommends that the Company seek input from the New Hampshire Department of Environmental Services (DES) regarding the effect, if any, of Northern's resource planning activities on environmental requirements. The Working Group recommends that the Company document this input from DES as part of its next LCIRP.

vi. Assessment of Long- and Short-term Environmental, Economic, and Energy Price and Supply Impact (RSA 378:38, VI)

The Working Group observes that Northern is a relatively small participant in the regional and national natural gas market, and adjustments in its resource supply procurement or deployment are unlikely to have a material impact on overall energy price or supply in the New England region. Northern's LCIRP process defines its supply position by comparing its planning load forecast to its current portfolio over a five-year planning horizon. See 2019 Northern LCIRP, Sec. VII, Resource Balance. The LCIRP then reviews incremental resource options (Sec. VIII) available to satisfy supply

needs and defines its approach to establishing a Preferred Portfolio (Sec. IX). Northern then assesses its supply impact by evaluating incremental resource options and defining its preferred portfolio. Accordingly, the Working Group believes Northern's LCIPR can satisfy this requirement by continuing its present analyses and implementing the additional steps described throughout this Report.

vii. Assessment of Plan Integration and Consistency with the State Energy Strategy (RSA 378:38, VII)

According to the Working Group, an assessment of LCIRP integration and consistency with the State Energy Strategy is necessarily the product of two inputs that are subject to change on a regular basis. Just as the Company's LCIRP is periodically updated to reflect current conditions, the development of the State Energy Strategy under RSA 12-P:7-a is undertaken by the DOE on a regular basis and may change depending upon the status of different technologies and policy preferences, among other considerations, over time.¹ The Working Group recommends that the Company include a discrete section in its next LCIRP assessing the Plan's integration and consistency with the State Energy Strategy under RSA 12-P.

C. Resource Alternatives to Traditional Resources

Northern has historically focused its resource planning efforts on "traditional natural gas supplies," such as flowing gas accessible via pipeline transportation capacity from production areas or supply hubs to its system, underground natural gas storage, and natural gas peaking supplies (collectively, traditional supplies). The Working Group recommends that Northern evaluate a more thorough set of alternative

¹ The DOE recently completed an updated State Energy Strategy which emphasizes cost effective use of energy resources in New Hampshire with a technology neutral approach. New Hampshire 10-Year State Energy Strategy, New Hampshire Department of Energy, Section 1: Energy Policy Goals, *available at* <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/2022-07/2022-state-energy-strategy.pdf> (July 2022).

resources in addition to traditional supplies to assess whether they might be equivalent (or superior).

With respect to demand-side resources, the Working Group recommends that Northern further analyze and assess incremental EE as a first-order option, including any new technologies to improve deployment of EE and available means to increase the development of existing EE technology and programs. While there is no mechanism to recover EE expense outside of the Energy Efficiency docket, the Working Group interprets the LCIRP Statute to direct utilities to maximize cost-effective EE and encourages the Commission to consider proposals that would allow for such investment if the relevant findings can be made. The Working Group notes that because Northern provides supply to one set of customers (Sales Service customers), plans capacity for another (Sales and Capacity-Assigned customers), and distributes gas to all customers, it will be important to carefully consider the design of potential incremental EE offerings so that costs and benefits are aligned in a just and reasonable manner. If Northern identifies cost-effective incremental EE in the context of LCIRP planning, it should pursue options to increase EE deployment and report on that deployment as part of the LCIRP.

The Working Group recommends that Northern further investigate and assess RNG and CG as potential offsets to existing traditional gas supplies. RNG includes biogas from anaerobic digestion, which may be associated with landfills, wastewater treatment plants, or standalone digesters to process animal manure or food waste, where such biogas (which typically includes about 60–70 percent methane) is cleaned to pipeline quality standards (which typically includes 90–95 percent methane). RNG may also be produced via thermal gasification of organic matter or by adding carbon to hydrogen, a process referred to as methanation, to create synthetic natural gas (SNG).

While other potential renewable supply options may emerge, such as green hydrogen, which is hydrogen synthesized using renewable power, those supply alternatives are not yet sufficiently developed or at a mature level where it would be reasonable or cost-effective for Northern to integrate them into its supply portfolio. The Working Group reviewed hydrogen as a direct fuel for blending with natural gas, but in addition to being an underdeveloped and costly market, the potential impacts of hydrogen on the Company's distribution system and customers' equipment are not yet well understood.

The Working Group also recommends Northern explore CG, a natural gas supply purported to be independently audited and certified to have been produced with much lower methane emissions than typical natural gas.

D. Environmental, Economic, and Health-related Impacts of Supply Resources

To compare resource alternatives in a manner consistent with the LCIRP Statute, Northern must assess not only the cost, reliability, and diversity of resources but must also assess environmental, public health, and economic impacts. These additional impact analyses apply to both existing resources and potential new resources, including both traditional supply options and resource alternatives. In its 2019 LCIRP, Northern addressed environmental, public health, and economic development effects as part of its resource impact summary. The Working Group believes there is room for improvement regarding Northern's evaluation by seeking to directly assess impacts in these areas where possible and by estimating the monetary effects of resources in each of these areas where feasible.

In terms of environmental impacts, the Working Group recommends that Northern estimate the direct greenhouse gas (GHG) emissions of portfolio resources and incremental resource options. The Working Group recommends that Northern

should estimate both fugitive emissions, which occur due to unintentional pipe leakage, and combustion emissions for all resource options.

The GHG emissions profile of a resource is generally determined by using emissions factors to convert activity data into associated quantities of emissions. Emissions factors are typically expressed in terms of emissions per unit of activity. For example, the emissions factor associated with fuel combustion depends on the compounds in the fuel. Northern may estimate the emissions of individual greenhouse gases, including methane (CH₄), carbon dioxide (CO₂), and nitrogen (N), but the Working Group recommends that Northern convert to carbon dioxide equivalent (CO₂e) in metric tons (MMT) per MMBtu or similar per-unit measurement for comparison of resources.

The Working Group states that Northern should convert the emissions to a monetary impact figure and fully explain its assumptions and sources. In this analysis, EE would be presumed to avoid the system average GHG emissions of Northern's portfolio on an incremental basis.

The Working Group defines public health impacts of gas resources as pollutants that impact local air quality, including nitrous oxides (NO_x), sulfur oxides (SO_x), and particulate matter (PM_{2.5}) emissions, and suggests that the amount of these pollutants from gas resources should be estimated and used to assess potential health impacts. The Working Group recommends that the Company evaluate a methodology for quantifying air quality pollutants, the associated public health impacts of those pollutants, and estimating the associated monetary cost of existing resources in its portfolio as well as incremental resource options being evaluated in terms of public health impact.

In terms of economic development impacts, the Working Group recommends that the Company evaluate the employment impacts of resource options in New Hampshire, specifically focusing on the Company's service territory. Specifically, the Working Group recommends that Northern estimate the direct, indirect, and induced jobs created by a new or existing resource, including considering any lost jobs as applicable. Northern should look for ways to quantify the economic impact of jobs added or lost to the State in monetary terms.

E. Working Group Recommendations for Future LCIRPs

The Working Group views appropriate LCIRP planning as a continuous effort to improve upon resource identification, assessment of impacts, and determination of cost-effectiveness while ensuring reliability, recognizing environmental, economic, and health related impacts, and supporting the availability of future supplies, as well as the financial stability of the utility. The Working Group recognizes that other recommendations it provided will introduce certain new analyses that will require additional explanation and presentation in the next LCIRP and over time.

The Working Group Report made eight specific recommendations:

- **Recommendation 1:** Evaluate incremental Energy Efficiency as a potential resource alternative and look for opportunities for C&I customer fuel switching.
- **Recommendation 2:** Evaluate renewable natural gas (RNG) as an alternative to traditional fuel supply explore certified gas (CG).
- **Recommendation 3:** Assess resources in terms of environmental impacts by documenting the greenhouse gas (GHG) impacts of evaluated resources in terms of emissions (MMT CO₂e) created or avoided and an estimate of associated monetary impact.
- **Recommendation 4:** Assess public health impacts in terms of the health effects of local air quality (AQ) impacts of evaluated resources by documenting SO_x, NO_x and PM_{2.5}, projecting health impacts and estimating the monetary impact.

- **Recommendation 5:** Assess economic development impacts by estimating direct, indirect, and induced jobs created from a resource and the associated economic development impact.
- **Recommendation 6:** Expand Northern's evaluation methods to include review of environmental, public health and economic development impacts of resource alternatives. Northern may separately present customer financial costs and evaluated societal costs due to environmental, public health and economic impacts.
- **Recommendation 7:** When assessing resource alternatives, identify opportunities to incorporate Non-Pipeline Alternatives that could avoid or defer reinforcements costs associated with distribution system infrastructure and seek to incorporate such opportunities as resource options are developed.
- **Recommendation 8:** Incorporate new material relating to the recommendations contained in this Report into Northern's LCIRP document in a logical manner, revisit the structure of Northern's Resource Impact Summary table, and look for opportunities to better label narrative sections to more clearly guide the reader.

III. POSITIONS OF THE PARTIES

The Settling Parties continued to participate in the Working Group through the time of Commission and DOE transition, including through more than twenty meetings in 2021 and into the early part of 2022. The final report of the Working Group relative to Northern's LCIRP was submitted to the Commission on March 31, 2022. The Settling Parties (Northern, OCA, and DOE) claim that the Working Group Report provides a reasonable road map for Northern and other parties to understand the requirements and expectations of the LCIRP Statute as it exists. The incremental adjustments that Northern will make to its planning and reporting will enable Northern to better align with the LCIRP Statute and improve its analysis of its gas supply and distribution requirements for its New Hampshire system. The Settling Parties requested that the Commission accept the Working Group Report and approve its recommendations for inclusion in Northern's next LCIRP.

IV. COMMISSION ANALYSIS

In this case, the Commission is considering a Working Group Report concerning the content of Northern's next LCIRP. We consider whether the Working Group recommendations are consistent with RSA 378:37–40, the LCIRP Statutes, and whether those recommendations will enhance our review of Northern's next LCIRP. In our evaluation of natural gas utilities' LCIRPs, we are guided by RSA 378:37:

The general court declares that it shall be the energy policy of this state to meet the energy needs of the citizens and businesses of the state **at the lowest reasonable cost** while providing for the reliability and diversity of energy sources; to maximize the use of cost effective energy efficiency and other demand side resources; and to protect the safety and health of the citizens, the physical environment of the state, and the future supplies of resources, with consideration of the financial stability of the state's utilities.

RSA 378:37 (*Emphasis added*).

Consistent with this statutory directive, the Commission is focused on minimizing the costs of natural gas supply and distribution infrastructure through the LCIRP planning process.

A. Commission Concerns with Escalating Costs

The Commission is concerned by the large growth in utilities' rate bases, despite little change in the number of customers served. We have noted trends of increasing investment in distribution system facilities and intend to examine utility capital expenditures more closely as part of the LCIRP process.

The table below shows Northern's rate base and operating revenue trends from 2010 to 2020.

Test year	Percentage Change		Yearly Increase	
	2016 vs 2020*	2010 vs 2020**	2016 vs 2020	2010 vs 2020
Rate Base	43.35%	171.32%	9.42%	10.50%
Operating Revenue	35.86%	124.86%	7.96%	8.44%

Source: DG 21-104 - NHPUC RR 1-2 Attachment 1, and Exhibit 15 (Settlement attachments 1)

* Increase from 2017 to 2021 Settlement

** Increase from 2011 to 2021 Settlement

The table above is copied from Order 26,650, page 16.

The table below shows Northern’s customer count trend from 2010 to 2020.

Year	Customers	Cumulative Change
2010	28,407	-
2011	28,843	1.53%
2012	29,505	3.87%
2013	30,198	6.30%
2014	31,121	9.55%
2015	31,661	11.45%
2016	32,263	13.57%
2017	33,037	16.30%
2018	33,715	18.69%
2019	34,235	20.52%
2020	35,346	24.43%

Source: DG 21-104 – NHPUC RR 1-1 Attachment 1

In 2010 Northern reported serving 28,407 customers. In 2020, Northern reported serving 35,346 customers. As a point of comparison, this represents a 24.43% growth in customers from 2010 to 2020. Over the same period, the company's rate base grew by 171.32%, and operating revenues increased by 124.86%.

B. Working Group Recommendations

We begin by thanking the Working Group for its report on the ways in which Northern may comply with the statutory framework of the LCIRP Statute in its future LCIRP filings. We find the Working Group recommendations helpful, and we use their eight recommendations as the structure to provide our analysis and guidance to Northern below.

Nonetheless, we find that many of these recommendations lack appropriate focus on the need to reduce gas supply costs and distribution system costs. Further, some of the recommendations will lead to an LCIRP filing that is more complex and expensive to produce without adhering to the main thrust of the LCIRP Statute, which is to choose the "lowest reasonable cost" options. See RSA 378:37. Specifically, we believe that any assessments and evaluations conducted as part of an LCIRP should be for the purpose of producing data that will be useful to the utility as a distribution utility in achieving the energy policy established by RSA 378:37. As explained with respect to certain recommendations below, studies that cannot serve this purpose, and that, therefore, increase costs to ratepayers without materially impacting the operations of the distribution utility are not appropriate components of LCIRPs.

Recommendation 1:

Energy Efficiency (EE) is currently subsumed within the Energy Efficiency Resource Plans for both electric and natural gas utilities operating in New Hampshire, with maximum ratepayer funding levels set legislatively. As a result, we do not expect

the LCIRP process to conflict with that policy decision by exploring additional ratepayer funding sources for EE. Further, we do not find that promoting C&I customer fuel switching is within the scope of the LCIRP. C&I, as well as residential customers, may switch fuels for economic or other reasons; however, a natural gas utility should remain focused on providing natural gas at the lowest possible cost.

Recommendation 2:

We agree that Northern should include RNG as a potential supply option; however, we caution that such resources should only be added to the Northern supply if they are the least cost options. For CG, we also have concerns relative to cost, the maturity of the standards, and the validation process for this novel category of gas product.

Recommendation 3:

We agree that Northern should assess the environmental impact of GHG emissions. We understand this to include the leakage of natural gas and other pollutants from the Northern distribution system in New Hampshire. We find that an analysis of the emissions caused by Northern's customers' combustion of the natural gas they receive is a broad inquiry beyond the purpose of the LCIRP. The LCIRP is to assist in planning for natural gas supply and distribution infrastructure, and the consideration of environmental factors, and the cost of mitigating them, are an important part of this process. This consideration, however, must be grounded in the direct operation of the Northern system in our State and not second or third-order impacts which are beyond the scope of the LCIRP.

Recommendation 4:

We agree that Northern should assess the health related impacts of the emissions resulting from leakage (also known as "lost gas" or "unmetered gas")

occurring in its distribution system in New Hampshire. This assessment should be based on state and federal government reports and peer-reviewed and publicly available reports concerning the public health impacts of emissions at levels similar to those resulting from leakage from Northern's distribution system. We will not require Northern to undertake its own study of those potential health impacts, the funding of which would be beyond the scope of the LCIRP.

Recommendation 5:

We agree that Northern should assess the economic impacts of its distribution system operation and its system upgrades by reporting on direct jobs attributable to Northern's operations over the last 20 years. To the extent that Northern believes that any of the supply options being considered would create jobs in New Hampshire, Northern should estimate the direct jobs that would be created by utilizing recent trends and past experience. We will not require Northern to perform its own economic analysis or develop a complex model, but we will accept such analysis as is available from the US Department of Labor or other governmental resources that Northern can identify.

Recommendation 6:

This recommendation covers environmental, health related, and economic impact assessments in a broader fashion. We have already provided guidance on these assessments through our analysis of Recommendations 3, 4, and 5 above.

Recommendation 7:

We agree that the company should seek to identify opportunities to incorporate NPAs that could avoid or defer reinforcement costs associated with distribution system infrastructure and seek to incorporate such opportunities as resource options are

developed. NPAs should also include truck and rail transit of propane, CNG, and LNG, as well as storage options (utility-sited storage, and customer-sited storage).

Recommendation 8:

We agree that Northern's next LCIRP should be clear and well-organized and should incorporate new material as discussed in this order. We encourage Northern to evaluate the areas identified in the recommendations as we have modified them above. As part of its capital planning process, Northern conducts assessments of proposed investments' environmental, economic and health related impact to ensure compliance with applicable state and federal laws. The Commission, likewise, expects the company to use its same internal resources for the purposes of its LCIRP process. The Commission does not wish to see substantial time and resources diverted to issues not directly involved with Northern's core business or to issues beyond the scope of the company's LCIRP.

C. Guidance for Northern's Future LCIRPs

The Commission views an LCIRP as the opportunity for the utilities it regulates to work with interested parties to evaluate capital plans that secure reliable and least-cost service for ratepayers. Going forward, the Commission will hold Northern to the capital plans developed through the LCIRPs and will expect sufficient notice and justification for any material deviations from those plans.

The recent trend of the rapid growth of utility rate base is of significant concern. Going forward, as part of each Northern rate case, we will consider how its capital investments align with its approved LCIRP and thus support the goal of securing the least cost resources and minimizing the rate impacts for customers. We find that this approach is consistent with the General Court's intent, as RSA 378:40 requires that a Commission-approved LCIRP be on file before a change in rates may occur.

It is the Commission's objective to transform the LCIRPs into a useful component of the capital planning process for Northern. We recognize that each company has its own capital planning process, and we do not seek to upend how companies make capital decisions but rather integrate the statutorily required LCIRP into each company's internal process. We will require that Northern conduct its capital planning in a manner consistent with the LCIRP Statute.

While uniformity in the formatting of summary documents across LCIRPs would facilitate Commission review, Northern is expected to provide all necessary supporting documents in the format that is used for their internal process. Thus, what Northern submits to the Commission should represent the same documentation and format that Northern's Board of Directors, and/or relevant subcommittees review. When necessary, the Commission will consider requests for confidentiality pursuant to the terms of RSA Chapter 91-A and Commission rules.

The LCIRPs are the chance for the Commission to exercise its regulatory role to ensure that each utility it regulates is making investments in capital assets to enable customers to benefit from the least cost resources available. For this evaluation, we are interested in two views, a functional view, and a project view.

- For the functional view, the Company should show planned investments in maintenance, system improvements (meters, main replacements, etc.), system expansion, new capacity (pipeline, storage), and any other major category the company believes would be useful to the Commission.
- For the project view, the Company should include descriptions of any planned projects costing \$200,000 or more and aggregated project listings by asset type for smaller investments.

Northern's summaries should include a capital planning time horizon looking out ten years and history for the previous five years, with investments expressed for each year

in dollars. Northern's load forecasts should continue to be 10-year forecasts and include the most recent five years of history.

On an annual basis, beginning the January 1st following Northern's next and subsequent LCIRPs, the Commission will require Northern to file capital investment summaries as described above, the status of major investments, and a discussion of the functional and project view as compared with Northern's prior approved LCIRP capital plan.

D. Filing Deadline for Northern's Next LCIRP

With regard to the timing of Northern's next LCIRP, the Commission issued Order No. 26,382 (July 23, 2020), approving the Settlement Agreement on Northern's LCIRP, and setting a deadline of July 1, 2022, for Northern to file its next LCIRP. That deadline was extended to December 31, 2022, by Order No. 26,510 (August 20, 2021). While we have simplified the required data in this order and would encourage the company to execute a December 31, 2022, filing, we find that good cause exists under RSA 378:38-a to further waive the two-year filing requirement and to extend the filing date for Northern's next LCIRP to March 31, 2023. We note that there will not be a further extension, barring unforeseen circumstances, and the company should plan accordingly.

Based upon the foregoing, it is hereby

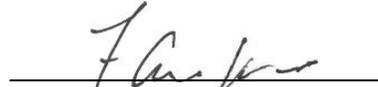
ORDERED, that the Working Group Report is ACCEPTED and ADOPTED WITH MODIFICATIONS as discussed herein; and it is

FURTHER ORDERED, that Northern shall file its next LCIRP in compliance with the Commission requirements as discussed in this order on or before March 31, 2023.

By order of the Public Utilities Commission of New Hampshire this eighth day of August, 2022.



Daniel C. Goldner
Chairman



F. Anne Ross
Special Commissioner

Service List - Docket Related

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