STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

EnergyNorth Natural Gas, Inc. Integrated Resource Plan

Docket DG 10-041

ENERGYNORTH NATURAL GAS, INC.'S MOTION FOR TWO MONTH EXTENSION OF FILING DEADLINE FOR LEAST COST INTEGRATED RESOURCE PLAN

EnergyNorth Natural Gas, Inc. d/b/a Liberty Utilities ("Liberty Utilities" or the "Company") respectfully requests that the Commission grant the Company a two month extension of time to submit its next Least Cost Integrated Resource Plan ("LCIRP") which is currently due no later than August 28, 2013. In support hereof, Liberty Utilities states as follows:

1. Previously in this proceeding, involving the Company's last LCIRP, the Commission ruled that the Company should submit its next LCIRP no later than February 28, 2013. Order 25,317 at 11. The Commission established that date because the Staff recommended that the Commission open a docket to "review the prudence of the Company carrying capacity in excess of that needed to meet its reliability planning standard." *Id* at 8. As a result, the Commission extended the time frame for filing of the next LCIRP to no later than February 28, 2013 "...to allow the Company and Staff to focus on the excess capacity docket noted above." *Id.* at 11.

2. On February 19, 2013, by Secretarial Letter, the Commission granted the Company's request for a six month extension, until August 28, 2013 because the outcome of the excess capacity docket, DG 12-001, would have affected the Company's planning process for the currently due LCIRP. 3. The Company now seeks an additional two months, until November 1, 2013, to file its LCIRP. The Company has been working diligently on the LCIRP in cooperation with its predecessor, National Grid, but needs some additional time to run various additional scenarios and perfect the end product.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

- A. Grant this Motion for Two Month Extension of Filing Deadline; and
- B. Grant such other and further relief as the Commission deems necessary and just.

Respectfully submitted,

ENERGYNORTH NATURAL GAS, INC. D/B/A LIBERTY UTILITIES

> By its Attorneys, DEVINE, MILLIMET & BRANCH, PROFESSIONAL, ASSOCIATION

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Dated: August 27, 2013