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June 7, 2017

Via Hand-Delivery and Electronic Mail

Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: Docket No. DG 13-313; Liberty Utilities (EnergyNorth Natural Gas) Corp.
Integrated Resource Plan
Assented-to Request to Extend Until October 1, 2017, the Deadline for the next
LCIRP Filing**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth”), I enclose an original and six copies of this request pursuant to RSA 378:38-a to extend until October 1, 2017, the deadline to file EnergyNorth’s next least cost integrated resource plan (“LCIRP”).

RSA 378:38 requires each natural gas utility to file an LCIRP “within 2 years of the Commission’s final order regarding the utility’s prior plan, and in all cases within 5 years of the filing date of the prior plan.” The Order regarding EnergyNorth’s prior plan was issued on February 9, 2015, initially making February 9, 2017, the two year deadline for the next filing. Order No. 25,762 at 5 (Feb. 9, 2015).

By secretarial letter dated January 11, 2017, the Commission granted EnergyNorth’s first request to extend the deadline to August 1, 2017. This second request seeks an additional two month extension, until October 1, 2017.

RSA 378:38-a, titled “Waiver by Commission,” states that the “commission, by order, may waive for good cause any requirement under RSA 378:38, upon written request by a utility.” For the reasons stated below, EnergyNorth makes this request to “waive,” or extend, the August 1, 2017, deadline until October 1, 2017.

A statutory requirement for an LCIRP is that it must include “an assessment of supply options including owned capacity.” RSA 378:38, III. EnergyNorth is currently planning

substantial changes to its “supply options including owned capacity.” These plans include new sources of supply and capacity. However, the Company is still in the process of negotiating the final terms and conditions of its contemplated supply and capacity contracts. These agreements will be filed for approval with the Commission and the Company does not anticipate that they will be finalized in time for inclusion in an LCIRP filed by the current August 1 deadline. A significant reason for the lack of finality can be attributed to the fact that the Company is working in conjunction with many of its fellow New England Local Distribution Companies (“LDCs”) to negotiate these agreements. By leveraging the combined volume requirements of the LDCs, the group is better able to negotiate favorable terms and conditions with each counterparty for the benefit of each LDC’s customers. Thus, additional time is necessary for each LDC to review, comment on, and ultimately approve the final terms and conditions of the various agreements. If the current deadline remains, EnergyNorth would have to file an incomplete LCIRP by August 1, then file a revised LCIRP once the new plans are finalized and ripe for disclosure, which the Company anticipates to be before October 1. Thus, an LCIRP filed in August will merely constitute, in effect, a preliminary filing that would have to be substantially updated by October 1 when much of the new information will be in a sufficiently finalized state.

EnergyNorth thus seeks an extension of the deadline to October 1, 2017, so that its LCIRP will fully describe the Company’s new plans for the Commission’s review.

Staff and the Office of Consumer Advocate both concur with the Company’s request to extend the deadline.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

cc: Service List

SERVICE LIST - EMAIL ADDRESSES- DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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Docket #: 13-313-1 Printed: January 11, 2017

FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**
- DEBRA A HOWLAND
EXEC DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**