

**THE STATE OF NEW HAMPSHIRE**  
**Before the**  
**PUBLIC UTILITIES COMMISSION**

**IR 22-042**

**ELECTRIC AND NATURAL GAS UTILITIES**

**Investigation of Energy Efficiency Planning, Programming, and Evaluation**

**MOTION FOR PARTIAL EXTENSION OF TIME TO FILE RESPONSES TO**  
**COMMISSION INQUIRIES**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07 and 202.04, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; New Hampshire Electric Cooperative, Inc.; Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc. (UES); Liberty Utilities (EnergyNorth Natural Gas) Corp d/b/a Liberty; and Northern Utilities, Inc. (Northern) (collectively the “NH Utilities”) respectfully request an extension of the filing deadline for certain of the information inquiries issued by the New Hampshire Public Utilities Commission (“Commission”) on November 1 and 4, 2022, in this docket. The NH Utilities will be able to provide responses to the majority of the inquiries by the current November 30, 2022 due date, but for those that require additional time, the NH Utilities ask that the Commission grant an extension for those remaining responses until January 9, 2023. In support of this motion the NH Utilities state the following:

1. On November 1, 2022 the Commission issued a procedural order that contained 32 requests for information. Attached to those inquiries was an excel template which the Commission directed the NH Utilities to populate new spreadsheets with specifically designated data according to the included instructions. On November 4, the Commission issued an additional five requests, all with multiple parts.

2. As the NH Utilities noted at the prehearing conference held on October 12, the development of the 2024-2026 statewide energy efficiency plan is underway, which is a significant undertaking that happens concurrently with and in addition to the daily administration of the current energy efficiency programs. No additional staffing resources are retained for this additional work, so the period of development of the triennial plan is a particularly busy time for the NH Utility energy efficiency staff.

3. The Commission expressed in Order No. 26,698 that it wanted to avoid hindering the development of the 2024-2026 plan by “welcome[ing] further elaboration of arguments relating to the scope and procedural schedule in this investigation so that our investigation does not impede or frustrate the development of the next triennial plan.” (Order at 6). The Chair reiterated this intent at the October 12, 2022 prehearing conference stating, “if there are particular deadlines in this docket that need to be modified due to other commitments, don't hesitate to inform us, we will do our best to accommodate them.” (October 12, 2022 Prehearing conference transcript at page 14).

4. Puc 202.04 states that the Commission shall grant an extension of time if: (1) The party making the request has demonstrated that circumstances would cause undue hardship or inconvenience unless the request were granted; and (2) The extension would not unduly delay the proceeding or adversely affect the rights of any party.

5. As to the first condition, the NH Utilities have been diligently preparing responses to all of the inquiries, but the daily workload of the energy efficiency staff<sup>1</sup> coupled with the additional effort of developing the 2024-2026 plan does limit the amount of time available to

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<sup>1</sup> The fourth quarter is the NH Utilities energy efficiency staff's busiest time of year due to finalization and close out of projects before year-end, along with set-up and preparation of the launch of programs beginning January 1. The NH Utilities are also currently working to finalize the official third quarter reports to be filed by November 30.

fully develop responses to all 37 inquiries including the attendant spreadsheets. It is imperative that the NH Utilities file a timely triennial plan, a priority echoed by the Commission as described above, and so cannot delay the planning process even in these early stages.

Completing responses to all Commission inquiries by the current filing deadline would require taking resources away from either the administration of current energy efficiency programming, or the development of the 2024-2026 plan, possibly compromising those efforts and therefore creating an undue hardship. The second condition of Puc 202.04 is also satisfied because there is no set procedural schedule in this proceeding to delay, nor are there any parties whose rights can be affected, as there are no parties to this proceeding.

6. The NH Utilities ask that an extension be granted to January 6, 2023 for a select number of responses, which require additional time to fully complete, specifically:

From the November 1 inquiries:

- 11
- II. 1
- VI. 2
- VII. 2
- VII. 4
- All of the information inquiries issued November 4, 2022.


The NH Utilities are prepared to file responses to all other information inquiries by the original deadline of November 30.


**WHEREFORE**, the NH UTILITIES respectfully request that the Commission:

- (1) Grant an extension to January 9, 2023 for the filing deadline of the responses to the inquiries listed above; and
- (2) Grant such further relief as may be just and equitable.

Respectfully submitted,  
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; New Hampshire Electric Cooperative, Inc.;  
Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc.; Liberty  
Utilities (EnergyNorth Natural Gas) Corp d/b/a Liberty; and Northern Utilities, Inc.

\_\_\_\_ 11/22/2022 \_\_\_\_

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### CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

\_\_\_\_\_ 11/22/2022 \_\_\_\_\_  
Date



\_\_\_\_\_ Jessica A. Chiavara \_\_\_\_\_