

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 SIX 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 six month extension of time to submit its next Least Cost Integrated Resource Plan (“LCIRP”) which is currently due no later than February 28, 2013. In support hereof, Liberty Utilities states as follows:

1. In DG 10-041, the docket 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 in DG 10-041 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 22, 2012, the Commission opened Docket DG 12-001 to consider the alleged excess capacity issues, which docket is ongoing. On October 22, 2012, the Commission

approved a revised procedural schedule for DG 12-001, which provides for a final hearing on March 20-21, 2013. *See* October 22, 2012 Secretarial Letter in DG 12-001.

3. On November 30, 2012, the Staff filed a letter with the Commission requesting that DG 12-001 be closed. The outcome of DG 12-001 affects the Company's planning process for its next LCIRP because once concluded, the Company will know which assets it has available to use to meet its supply obligations which in turn will directly affect its planning process for the LCIRP.

4. Assuming that the Commission grants the Staff's request to close DG 12-001, the Company seeks until August 28, 2013 to file its LCIRP. This will give the Company sufficient time to complete its planning process, including taking into account the result of DG 12-001.

5. The Staff and the Office of Consumer Advocate do not object to the relief requested in this motion.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

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

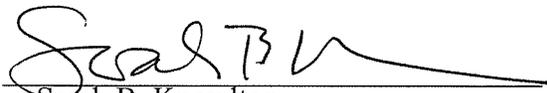
Respectfully submitted,

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

By its Attorney,

Date: December 11, 2012

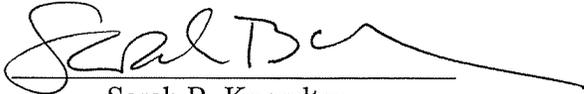
By:



Sarah B. Knowlton
Assistant General Counsel
Liberty Energy Utilities (New Hampshire) Corp.
11 Northeastern Boulevard
Salem, NH 03079
Telephone (603) 328-2794
sarah.knowlton@libertyutilites.com

Certificate of Service

I hereby certify that on December 11, 2012, a copy of this Motion has been forwarded to the service list in DG 10-041.



Sarah B. Knowlton