



HPUC 29MAY'19AM10:31

May 28, 2019

BY OVERNIGHT MAIL AND E-MAIL

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

RE: Docket No. DG 15-033, Northern Utilities, Inc. Integrated Resource Plan

Dear Director Howland:

Please accept this letter as the request of Northern Utilities, Inc. ("Northern") for an extension of time to file its Integrated Resource Plan ("IRP").

Pursuant to the Public Utilities Commission's ("Commission") Order No. 26,027 in Docket DG 15-033 (June 19, 2017), Northern is required to file its next IRP on or before June 1, 2019. While Northern has worked diligently on this filing, the Company needs additional time to complete its analysis and perform an internal review. Northern's Maine division is currently participating in a gas supply and procurement audit (Docket 2018-00300) and Company personnel have devoted significant time and resources to responding to discovery over the last several months. Accordingly, the Company requests a brief, one-month extension of time until Monday July 1, 2019 to file its IRP. The Company has requested a similar extension of time to file its IRP in Maine. The Company submits that this request will not detrimentally affect the ability of the Commission or interested persons to perform a thorough investigation and review of the filing.

The Commission Staff and the Office of Consumer Advocate have been advised of this request and neither office opposes it.

The Company notes that the Commission's Order approving the Company's last IRP was issued on June 19, 2017. Pursuant to RSA 378:38, a natural gas utility "shall file a least cost integrated resource plan with the commission within 2 years of the commission's final order regarding the utility's prior plan, and in all cases within 5 years of

Gary Epler
Chief Regulatory Counsel
epler@unitil.com

6 Liberty Lane West
Hampton, NH 03842



the filing date of the prior plan.” RSA 378:38. However, RSA 378:38-a states that the Commission “may waive for good cause any requirement under RSA 378:38, upon written request by a utility.” RSA 378:38-a. To the extent that the Commission believes that such a waiver is required in this instance, Northern requests that the Commission treat this letter as a written request for such a waiver. Good cause exists for a grant of additional time as explained above, and the additional time requested is *de minimis* (twelve calendar days, i.e., the difference between June 19, 2019 and July 1, 2019).

Sincerely,

Patrick Taylor
Attorney for Northern Utilities, Inc.

cc: Service List

Gary Epler
Chief Regulatory Counsel
epler@unitil.com

6 Liberty Lane West
Hampton, NH 03842

T 603.773.6440 F 603.773.6740 www.unitil.com

LINKEL