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September 29, 2022

Daniel C. Goldner, Chairman
Public Utilities Commission
21 S. Fruit Street
Concord, NH 03301-2429

Re: DG 19-126 Northern Utilities, Inc. 2019-2024 Integrated Resource Plan,
*DOE Clarification of Position—DOE has no position on the Working Group Report
recommendations in this docket.*

Dear Chairman Goldner:

The Department of Energy (DOE) is filing this letter to further clarify for the record the DOE's role in the Working Group Report that was recently the focus of the Commission's review in Order No. 26,688 (Sept. 19, 2022) and Order No. 26,689 (Sept. 19, 2022). In both orders, the Commission stated that:

The settling parties (Northern, OCA, and DOE) claimed that the Working Group Report provides a reasonable road map for Northern and other parties to understand the requirements and expectations of the LCIRP Statute. The settling parties requested that the Commission accept the Working Group Report and approve its recommendations for inclusion in Northern's next LCIRP.

Order No. 26,688 at 2; Order No. 26,689 at 2.

DOE is a "Settling Party." *See* Settlement Agreement (filed May 27, 2020); Order No. 26,382 (July 23, 2020 (approving Settlement Agreement)). However, DOE wishes to clarify that it did not make any claims about the Working Group Report; neither did DOE ask the Commission to accept that report. *See* Northern's cover letter dated March 31, 2022 ("... Northern understands DOE was not prepared to provide its final agreement to the Working Group report as of the date of filing and may provide a supplemental statement at a later date"); *but see* Dkt. No. DG 17-152, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities Settlement Agreement (filed July 20, 2022) (DOE recommends the Commission adopt modified versions of some of the Northern Working Group Report's recommendations); Order No. 26,684 (Sept. 14, 2022) (interim order rejecting settlement). Thus, when the Working Group Report references "the Working Group" it should reference Northern and OCA only. DOE did not take a position on the Working Group Report itself, as filed. DOE did participate in Working Group meetings.

While a close reading of Northern's cover letter makes clear DOE's position on these matters, some of the statements in Orders No. 26,688 and 26,689 seem to conflate the DOE with the other "Settling Parties," which would be inaccurate in this context. DOE submits this letter to clarify that while it is a Settling Party, it did not take a position on the Working Group Report recommendations in this docket, Docket No. DG 19-126.

Consistent with the Commission's current policy, this letter is being filed solely in electronic form.
Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Mary E. Schwarzer

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