

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Liberty Utilities (Granite State Electric) Corp.
d/b/a Liberty

Docket No. DE 21-004

Least Cost Integrated Resource Plan

Assented-to Motion to Amend Procedural Schedule

Liberty Utilities (Granite State Electric). d/b/a Liberty (Company), through counsel, respectfully moves the Commission to amend the procedural schedule in this docket to suspend the February 18, 2022, deadline for the Company to file its Non-Wires Solution (NWS) proposal.

In support of this motion, Liberty represents as follows:

1. The procedural schedule in this docket calls for the Company to file its NWS proposal by February 18, 2022. The NWS proposal is a component of the Company's Least Cost Integrated Resource Plan (LCIRP) that is before the Commission for its review in this docket.
2. The Company is in the process of reassessing its NWS with respect to planning criteria, reliability, and how this project compares to traditional options in light of changing market dynamics.
3. Since it is difficult to estimate the time necessary to conduct the reassessment and update or amend the NWS proposal, the Company requests suspension of only the February 18, 2022, deadline.

4. The Company will engage the parties to this proceeding regarding the NWS proposal on an ongoing basis and, with their input, determine an appropriate deadline for its filing.
5. The Company does not request a change to any other dates in the procedural schedule. The parties may continue to conduct their review of all other aspects of the LCIRP.
6. The Company asked the parties to this docket for their position on this request to postpone the filing date for the NWS proposal. Both the Department of Energy and the Office of the Consumer Advocate indicated that they do not object. No other party has sought to intervene.

WHEREFORE, Liberty respectfully asks the Commission to:

- a. Grant this motion and suspend the February 18, 2022, deadline for the Company to file its NWS proposal;
- b. Grant any further relief deemed just and proper.

Respectfully submitted,
Liberty Utilities (Granite State Electric) Corp.
By its Attorney,



Date: February 18, 2022

By: _____

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Certificate of Service

I hereby certify that on February 18, 2022, a copy of this motion has been electronically forwarded to the service list.



By: _____
Michael J. Sheehan