

**THE STATE OF NEW HAMPSHIRE**  
**BEFORE THE**  
**PUBLIC UTILITIES COMMISSION**  
**DG 21-144**

**Petition for Approval of**  
**Seventh Amendment to Special Contract**  
**With Foss Manufacturing Company, LLC**

**UNCONTESTED MOTION TO EXTEND DEADLINE**  
**FOR RESPONDING TO RECORD REQUESTS**

NOW COMES Northern Utilities, Inc. (“Northern” or “the Company”) and, pursuant to N.H. Admin. Rule Puc 202.04, respectfully moves the New Hampshire Public Utilities Commission (“the Commission”) to extend the deadline for filing responses to the Commission’s Record Requests in the above-captioned docket from September 23, 2022 to October 7, 2022. In support of this Motion, Northern states as follows:

1. On September 15, 2022, the Commission issued a Procedural Order Re: Record Requests which included Record Requests for Northern, and establishing a deadline of September 23, 2022 for Northern’s responses.
2. To respond to the above-reference Record Requests, Northern must consult with its outside experts at Atrium Economics, LLC who conducted several studies for Northern’s latest rate case, DG 21-104. These studies included: allocated cost of service; marginal cost of service; revenue apportionment and revenue targets by class; and rate design.

3. In order to provide Northern sufficient time to consult with its outside experts to develop responses to the Record Requests, Northern respectfully requests that the above-referenced response deadline be extended to October 7, 2022.

4. Extending the deadline for Northern's responses to the Record Requests will not unduly delay the proceeding or adversely affect the rights of any party, as there has been no procedural schedule established for this docket.

5. In accordance with N.H. Admin. R. Puc 202.04 (b), the undersigned has made a good faith attempt to obtain the other parties' consent to this Motion. The other parties' positions on this Motion are as follows: the New Hampshire Department of Energy assents; the Office of Consumer Advocate assents; and Foss Manufacturing Company, LLC supports the Motion.

WHEREFORE, Northern respectfully requests that the Commission:

- A. Extend the deadline for Northern's responses to the Record Requests issued September 15, 2022 from September 23, 2022 to on or before October 7, 2022; and
- B. Grant such additional relief as is just and appropriate.

**NORTHERN UTILITIES, INC.**

By its Attorneys,  
Orr & Reno, P.A.



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Dated: September 22, 2022

Certificate of Service

I hereby certify that on the date set forth above a copy of the foregoing Motion was sent electronically to the Service List for this docket.

A handwritten signature in blue ink, appearing to read "Susan S. Geiger". The signature is fluid and cursive, with the first name "Susan" and last name "Geiger" clearly legible, and "S." in the middle.

Susan S. Geiger