

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DE 24-044

LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.
d/b/a LIBERTY

2023 Vegetation Management Program Plan

**Motion to Extend Deadline to Provide the CY 2025 VMP Plan to the New Hampshire
Department of Energy**

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (“Liberty” or the “Company”), through counsel, respectfully moves the New Hampshire Public Utilities Commission (the “Commission”) pursuant to Puc 203.07 to extend the November 15, 2024, deadline for providing the Department of Energy (“DOE” or the “Department”) with the Company’s Calendar Year 2025 Vegetation Management Program Plan (the “CY2025 VMP Plan”) to allow for filing of a settlement agreement in DE 23-039. The settlement agreement to be filed in DE 23-039 will address the Company’s vegetation management program. Accordingly, the Company’s CY2025 VMP Plan should reflect the terms of that settlement agreement.

The Company will provide the Department with a CY 2025 VMP Plan that is consistent with the terms of the DE 23-039 settlement agreement by December 13, 2024.

In support of this motion, Liberty represents as follows:

1. The Settlement Agreement in Docket No. DE 13-063 established Liberty’s VMP procedural requirements. One requirement is for the Company to provide Commission Staff (now DOE), with its VMP Plan for the upcoming calendar year as set forth below:

a. Beginning with November 15, 2014, the Company will provide its [Reliability Enhancement Program (“REP”)] and VMP plan (the “Plan”) to Staff for the following calendar year for Staff’s review. The Company will meet with Staff in technical sessions to discuss the Plan, obtain comments, and answer any questions regarding the plan to be implemented for the subsequent calendar year. After review by Staff, the Company will take all reasonable steps it deems appropriate to carry out and implement the Plan, taking into account the comments of Staff. Review by Staff of the Plan does not relieve the Company of its obligation to operate its business and maintain safe, reliable service through expenditures and other capital investments in the ordinary course of business that are not set forth in the Plan, nor does it bind Staff to a particular position regarding the adequacy and/or effectiveness of the Plan.

b. The Plan shall provide a description of the activities along with targeted expenditures and investments of the proposed Plan to be implemented during the following calendar year. The Plan will itemize the proposed activities by general category and provide budgets for both operation and maintenance (“O&M”) expenses and capital investments expected from implementation of the Plan. The O&M budget will be \$1,360,000 (the “Base Plan O&M”) for the calendar year (“Base Plan O&M Budget”). The Company may also provide for consideration an alternative Plan with O&M budgets that exceed the O&M Base Amount for the calendar year. The Company will reconcile actual expenditures and investments with the Base Plan O&M amount of \$1,360,000 and shall be subject to the REP/VMP Adjustment Provision, as set forth in Section IV below. All of the combined expenses will be counted against the Base Plan O&M amount, along with any REP-related O&M that does not relate to a VMP category.

(Docket No. DE 13-063, Exhibit 1, at 40-41 (Attachment F to the Settlement Agreement) (emphasis added)).

2. The Company’s subsequent rate proceeding, DE 19-064, maintained these reporting requirements pursuant to the settlement agreement approved in that proceeding (DE 19-064, Exhibit 37, at 11 (Settlement Agreement, Section (G)(2))).
3. The Company has provided Commission Staff and, more recently, the Department with its VMP Plan each November since the Commission’s approval of the DE 13-063 Settlement

(*see, e.g.*, Exhibit 1 in this docket, at Bates 023 (providing the CY2023 VMP Plan submitted to the New Hampshire Department of Energy on November 15, 2022)). The Company's CY2024 VMP was provided to the DOE on November 15, 2023, and will be included in the Company's reconciliation filing submitted to the Commission in 2025.

4. Liberty files this motion to extend the November 15, 2024, deadline for presenting to the Department its CY2025 VMP Plan because the settlement agreement in DE 23-039 will make changes to the Company's VMP, if approved.
5. Thus, rather than filing a Plan based on the existing budget and terms, Liberty intends to file its CY2025 VMP Plan based on the terms of the DE 23-039 Settlement Agreement.
6. The parties to DE 23-039 intend to file the DE 23-039 Settlement Agreement by November 15, 2024, and thus Liberty asks the Commission to extend until December 13, 2024, the deadline for providing the Department with its CY2025 VMP Plan.
7. The Department of Energy assents to this request.
8. Liberty files this request in the above VMP reconciliation docket because it is the most appropriate place for such a request. The delivery of the VMP Plan to the Department will not trigger the opening of a new Commission docket and, since the deadline arises from a Commission order, the most recent VMP reconciliation docket was determined to be the most appropriate proceeding for this request.

WHEREFORE, Liberty respectfully requests that the Commission:

- A. Extend until December 13, 2024, the deadline for providing the Department the CY2025 VMP Plan; and
- B. Order such further relief as may be just and equitable.

Respectfully submitted,

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

By its Attorney,



Date: November 14, 2024

By:

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Certificate of Service

I hereby certify that on November 14, 2024, a copy of this motion has been electronically forwarded to the service list.



Michael J. Sheehan