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STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION
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DG 14-184

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July 11, 2014

Sarah B. Knowlton, Esq.
Assistant General Counsel
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053

RE: DG 14-184 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Request for Waiver of Puc 1203.11 (i)

Dear Ms. Knowlton:

After reviewing the Waiver Request filed by Liberty on July 7, 2014, Staff has identified additional information and clarification necessary before Staff can provide a recommendation to the Commission.

In accordance with Puc 1203.20, electric, gas and water utilities with more than 10,000 customers submit a monthly Utility Disconnection Activity Report and a monthly Utility Accounts Receivable Report. Those reports provide information about the collection activities undertaken by the utilities and also provide information regarding utility accounts receivable. A review of the reports submitted by Liberty for EnergyNorth shows that no service disconnections were performed during September 2013 and October 2013. The suspension of collection activities following the cutover of gas service customer accounts had been communicated to Commission Staff and was expected. No service disconnections were reported for the months of November 2013, December 2013, January 2014, February 2014, March 2014, April 2014 and May 2014. Staff understands that Liberty adopted the policy followed by National Grid and does not undertake payment related service disconnections during the winter period for heat accounts. It is not clear why no service disconnections were performed during the months of April 2014 and May 2014 and why collections activities were not taken on non-heat accounts during the winter period. Staff requests the following information regarding Liberty's field collection efforts:

- 1) When did Liberty begin to issue and actively work field disconnection orders?

- 2) Why were no field disconnections performed after March 31, 2014 and prior to the date Liberty began actively working field disconnection orders?
- 3) During the period November 15, 2013 through March 31, 2014, were there non-heat accounts with past balances greater than \$125? If so, why were no disconnection orders issued or other collection activities undertaken on those accounts?
- 4) In its Waiver Request, Liberty states that it has hired and is currently training 10 additional field technicians. When will the training for those technicians be completed? Are any or all of the 10 new positions permanent, full-time positions?

Should you have any questions, please feel free to contact me or Staff Attorney David Wiesner.

Sincerely,



Amanda O. Noonan
Director, Consumer Affairs

cc: David K. Wiesner, Staff Attorney

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:
- DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.