

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DG 17-048

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES**

Distribution Service Rate Case

Motion for View and Inspection of Training Center and iNATGAS Facility

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or the “Company”), through counsel, respectfully moves the New Hampshire Public Utilities Commission to conduct a view of two facilities that are at issue in the above matter.

In support of this motion, the Company states as follows:

1. Puc 203.28, titled “Views and Inspections,” provides:

The commission shall take a view or conduct an inspection of any property which is the subject of a hearing before the commission if requested by a party, or on its own motion, if the commission shall have determined that the view or inspection will assist the commission in reaching a determination in the hearing.

2. The training center and the iNATGAS facility, both located on Broken Bridge Road in Concord, New Hampshire, are “propert[ies] which [are] the subject of a hearing before the commission” in this docket, and, given the nature of the disputes over these properties, a view would “assist the commission in reaching a determination” at the upcoming hearing.
3. First, Staff recommended that the Company denied recovery of the cost of the training center. Staff maintained that the Company could have used a combination of existing facilities and on-the-job training in the field. The Company disputes this recommendation because the training facility was the best available option, provides better and safer training, allows for greater training as requirements increase, and allows for a

broader range of training, including training of more employees, than could be accomplished solely through on-the-job training.

4. Conducting a view of the training center will help the Commission better understand and evaluate the facts supporting each party's case as to the reasonableness of the Company's decision to build the training center.

5. Second, Staff recommended that the Company be denied recovery of a portion of the revenue requirement associated with the cost of the iNATGAS facility (Frink testimony at Bates 25), a CNG station located adjacent to the training center on Broken Bridge Road in Concord, because the costs exceeded the estimate available when the Commission approved the special contract and related documents with iNATGAS. The Company disagrees with this recommendation because the actual costs incurred were reasonable and full construction was prudent.

6. A view and inspection of the iNATGAS facility will similarly help the Commission understand the size and scope of the facility as initially proposed, what was ultimately constructed, and the reasons for those changes.

7. The Office of the Consumer Advocate supports this motion.

8. Staff was provided a draft of this motion. Staff declined to take a position at this time, but reserved its right to file an objection within the time allowed.

WHEREFORE, Liberty respectfully asks that the Commission:

- A. Grant this motion and conduct a view of the training center and iNATGAS facility as part of the hearing in this docket;
- B. Grant such other relief as is just and reasonable and consistent with the public interest.

Respectfully submitted,

Liberty Utilities (EnergyNorth Natural Gas) Corp.
d/b/a Liberty Utilities

By its Attorney,



Date: February 27, 2018

By: _____
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Certificate of Service

I hereby certify that on February 27, 2018, a copy of this motion has been forwarded to the service list.



By: _____
Michael J. Sheehan