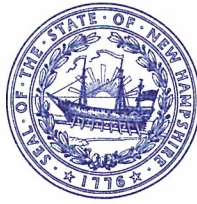


STATE OF NEW HAMPSHIRE

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September 30, 2014

Debra A. Howland
Executive Director
N.H. Public Utilities Commission
21 S. Fruit St., Ste. 10
Concord, NH 03301

RE: DG 14-180 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Distribution Rate Case
Iberdrola's Petition to Intervene

Dear Ms. Howland,

Please accept this response on behalf of the Office of the Consumer Advocate (OCA) to Iberdrola USA Enterprises, Inc.'s (Iberdrola) Petition to Intervene filed on September 25, 2014. The petition is prompted by statements made by Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (Liberty Gas) in its testimony, which referred to a possible supplemental filing related to New Hampshire Gas Corporation's ("NHGC") customers' rates. The OCA does not object to Iberdrola's petition and responds to explain to the Commission its present understanding of the status of Liberty's plans to supplement its case.

At this point, there is no information or proposal to change the rates of NHGC customers in this proceeding. See, e.g., Liberty's response to OCA 2-12 in DG 14-155, Liberty Gas' proposal to acquire NHGC ("No such filing has yet been made, and [Liberty Gas] has not yet determined when such a filing may occur....") (attached); and Liberty's Response to OCA 2-11 in DG 14-155 ("No rate plan has been finalized...The testimony referenced above is intended only to indicate that [Liberty Gas] may submit an update to its request in Docket No. DG 14-180. It has not committed to do so, and [Liberty Gas] has not made any rate filing to change the rates applicable to NHGC customers.") (attached). In addition, it is the OCA's position that Liberty cannot make such a proposal unless and until it is the owner of NHGC, which has yet to be determined.

Moreover, the OCA would note that no customer of NHGC has been given notice that its rates might be affected by this case. The OCA submits that if Liberty were to become the owner of NHGC and were to make a filing in this case to change the rates of NHGC customers, then NHGC customers must be given notice of such a filing and given the opportunity to participate in this case.

Thank you for this opportunity to respond to Iberdrola's petition.

Sincerely,



Rorie E.P. Hollenberg
Assistant Consumer Advocate

cc: Service list and counsel for Iberdrola via electronic delivery
Enclosures