

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 Partial Waiver of Rate Case Filing Requirements
as to the Keene Division

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 pursuant to Puc 201.05 for a partial waiver of the Puc 1604 filing requirement as to the Keene Division because some responsive information for Keene is the same as that being provided in EnergyNorth’s compilation of rate case filing requirements.

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

1. Puc 1604.01 requires a petitioning utility to file a number of documents with its rate case, itemized at Puc 1604(a)(1) through (a)(26).
2. The Company has prepared separate sets of rate case filing requirements for EnergyNorth and for the Keene Division.
3. In three instances where information required of the Keene Division is identical to that provided by EnergyNorth, the Keene Division’s rate case filing requirements simply reference the EnergyNorth filing.
4. Those three instances are the responses filed in satisfaction of Puc 1604.01(a)(9) (“the utility’s chart of accounts”), (a)(14) (“a list of officers and directors of the utility and their full compensation”), and (a)(15) (“copies of all officer and executive incentive plans”).

5. To the extent these references to EnergyNorth's filing renders noncompliant the Keene Division's rate case filing requirements, the Company requests a waiver to the extent necessary.

6. Puc 201.05 states that the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether a waiver will serve the public interest, the Commission examines whether compliance with the rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

7. The Keene Division's cross references to the EnergyNorth rate case filing requirements serve the public interest and do not disrupt the orderly and efficient resolution of this matter. To the contrary, the cross references are more efficient, save the unnecessary filing of redundant information, and the purposes of the rule are satisfied because the requested information is provided in EnergyNorth's set of rate case filing requirements.

WHEREFORE, EnergyNorth respectfully requests that the Commission:

- A. Grant this motion and waive the requirement that the Keene Division include responses to Puc 1601(a)(9), (14), and (15) in its rate case filing requirements; and
- B. Such other relief as is just and equitable.

Respectfully submitted,
LIBERTY UTILITIES (ENERGYNORTH NATURAL
GAS) CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



Date: April 28, 2017

By: _____
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Certificate of Service

I hereby certify that on April 28, 2017, a copy of this Motion has been forwarded to the service list in this docket.



Michael J. Sheehan