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STATE OF NEW HAMPSHIRE



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October 26, 2018

NHPLC 26OCT'18PM2:36

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301

Via Hand Delivery

Re: DG 17-048; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities;
Petition for Permanent and Temporary Rates;

Motion to Reopen the Record to Admit an Additional Exhibit

Dear Ms. Howland:

Pursuant to Puc Rule 203.30, Staff hereby moves to reopen the record in the above referenced proceeding for the purpose of admitting an additional exhibit. In support of this Motion, Staff states as follows:

1. At the hearing held in this matter on October 22, 2018 on the subject of Liberty's decoupling customer education plan, Liberty's counsel and Staff counsel questioned Liberty's witnesses about its decoupling education plan. Both counsel did so by referring to a numbered list of seven actions that Liberty agreed take to help educate its customers about decoupling.^{1,2}
2. Neither Liberty nor Staff sought to have the list marked as an exhibit or entered into evidence at the October 22 hearing.
3. The list is relevant to an issue the Commission will decide in this case; *i.e.* whether to approve Liberty's decoupling customer education plan.
4. Absent the list being admitted, the Commission will have to rely on Liberty's witnesses summary of the planned actions when deciding on Liberty's education plan.

¹ The list is attached to this Motion.

² The list contains one additional item (Item 8) that Liberty believes has limited value in customer education and thus it does not propose to take.

5. The Commission's decision will be aided by having access to the detailed action list.
6. No additional cross examination on the list should be required because Liberty, Staff and the Office of Consumer Advocate had the list at the October 22 hearing and had an opportunity to ask questions about the list at that time.
7. Staff sought concurrence with this Motion prior to filing but has not heard back from either Liberty or OCA.

Staff respectfully request that the Commission reopen the record of this docket and admit the list of decoupling education actions attached hereto.

Thank you for your attention to this matter.

Sincerely,



Paul B. Dexter
Staff Attorney

cc: Service List
Enclosures

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
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NHPUC
21 S. FRUIT ST, SUITE 10
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- 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.**