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March 15, 2019

Via Hand-Delivery and Electronic Mail

NHPUC 15MAR'19r41:12

Debra Howland, Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, New Hampshire 03301-2429

Re: Docket No. DG 18-964; Liberty Utilities (EnergyNorth Natural Gas) Corp. 2018 Cast Iron/Bare Steel Replacement Program Results

Staff Recommendation to Terminate Liberty's CIBS Replacement Program

Dear Ms. Howland:

By Secretarial Letter dated February 26, 2019, the Commission requested the Company to "file a response to Staff's recommendation and a preliminary rate proposal for CIBS FY 2019 [which] should consist of the applicable revenue requirement schedules and should be summarized in a cover letter."

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., enclosed please find seven copies of *Liberty's Response to Staff's Recommendation to Terminate the CIBS Program*, and of the Company's preliminary rate proposal for CIBS FY 2019, which document consists of the appropriate revenue requirement schedules and is titled, *Computation of Revenue Requirement*.

In summary, the preliminary annual requirement for CIBS FY 2019 is \$1,422,784. This preliminary annual revenue requirement includes estimated CIBS FY 2019 program spend of \$7,942,248 on mains, \$1,021,210 on services, and \$3,584,219 on FY 2018 carryover. It also includes a distribution rate correction of (\$7,290 including interest) related to a low income adjustment that has been in effect since July 1, 2018. The typical residential heating customer would see a \$6.04 *annual* increase if the estimated revenue requirement were to go into effect on July 1, 2019.

Sincerely,

Michael J. Sheehan

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Cc: Service List

Enclosures