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April 6, 2021

Via Electronic Mail Only

Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Docket No. DE 19-064; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Distribution Service Rate Case

Dear Ms. Howland:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, and pursuant to Order No. 26,376 (June 30, 2020), attached please find the *Direct Testimony of Anthony Strabone and Heather M. Tebbetts*, with attachments, in support of the Company's request for approval of a distribution rate increase of \$1,959,499, effective July 1, 2021. This amount is comprised of \$1,844,326, the revenue requirement to recover \$11,439,907 in capital assets placed into service during 2020, and \$115,123, an adjustment to the recovery of rate case expenses and recoupment to reflect final costs and recovery to date.

The Company also seeks a waiver of Puc 1603.05(a)(1), which states: "A utility that proposes to revise an existing tariff shall submit ... [t]he entire page on which any revision occurs." The Company notes that tariff pages filed now to reflect the requested rate changes will be out of date well before the time of hearing, order, and effective date because of other dockets that will also adjust rates before July 1, including the retail rate filing (Docket No. DE 21-063), the VMP filing (Docket No. DE 21-049), and perhaps the request to approve a property tax mechanism (Docket No. DE 21-040). The Company will prepare and file a proposed tariff in advance of the hearing in this docket.

The Commission "shall waive the provisions of any of its rules ... if the commission finds that: (1) The waiver serves the public interest; and (2) the waiver will not disrupt the orderly and efficient resolution of matters before the commission." Puc 201.05(a). When considering whether a waiver request serves the public interest, "the commission shall waive a rule if ... [t]he purpose of the rule would be satisfied by an alternative method proposed." Puc 201.05(b).

The waiver requested here will not disrupt the resolution of any matter before the Commission because the absence of the proposed tariff will not cause delay and because the attached filing contains all the information that would be in proposed tariff language. A waiver would also satisfy the “public interest” standard because the requested waiver constitutes a proposed “alternative method” that would “satisfy” the “purpose of the rule” in that the proposed tariff to be filed shortly before hearing in this docket will reflect all the changes that will be made through the other dockets referenced above, and will accurately present the proposed tariff changes.

Pursuant to the Commission’s March 17, 2020, secretarial letter, only an electronic version of this filing will be provided. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Enclosures

Cc: Service List