



Michael J. Sheehan, Esq.
Director, Legal Services
Phone: 603-724-2135
Email: Michael.Sheehan@libertyutilities.com

April 6, 2022

Via Electronic Mail Only

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

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

Dear Chairman Goldner:

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 \$1,751,403, effective July 1, 2022. This amount is the revenue requirement to recover \$10,187,080 in capital assets placed into service during 2021.

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 The Company notes that tariff pages filed now to reflect the requested rate changes will be out of date well before the time of hearing, order, and effective date because of other dockets that will also adjust rates before July 1, including the retail rate filing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 22-018) and the VMP filing (Docket No. DE 22-014). 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).

In ruling on a similar waiver request with the Company's filing in DE 22-018, the Commission identified an "alternative method" and authorized the Company "to file illustrative tariff pages in this matter that contain both the changes proposed in this docket and in Docket No. DE 22-014, and which

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retain the header and footer markings as filed in Docket No. DE 22-014." April 1, 2022, Procedural Order Re: Request for Waiver of Puc 1603.05(b).

Following the rationale of that procedural order, the Company includes with this filing illustrative tariff pages that contain the effect of the proposed changes in DE 22-014, DE 22-018, and in this docket.

Please include the following on the service list in this matter:

- Anthony Strabone Anthony.Strabone@libertyutilities.com
- Heather Tebbetts Heather.Tebbetts@libertyutilities.com
- Erica Menard Erica.Menard@libertyutilities.com
- Melissa Samenfeld Melissa.Samenfeld@libertyutilities.com
- Maureen Karpf Maureen.Karpf@libertyutilities.com
- Karen Anne Sinville KarenAnne.Sinville@libertyutilities.com

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

Sincerely,



Michael J. Sheehan

Enclosures

Cc: Service List