

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 20-105

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

Distribution Service Rate Case

Motion to Amend Petition

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth”), through counsel, and as directed by the Commission in Order No. 26,409 (Oct. 6, 2020), respectfully moves the Commission to amend its *Petition for Permanent and Temporary Rates* to add the Company’s request to recover costs incurred to investigate, evaluate, and assess the future development of the Granite Bridge Project (the “Granite Bridge Project Costs”).

In support of this motion, EnergyNorth represents as follows:

1. In July 2020, EnergyNorth filed a motion to amend its petition in Docket No. DG 17-198, which was the docket to review EnergyNorth’s proposed Granite Bridge Project. The motion included requests to withdraw consideration of the Granite Bridge Project and to obtain approval to recover the Granite Bridge Project Costs.
2. The Commission denied the request to add consideration of the Granite Bridge Project Costs to Docket No. DG 17-198, stating: “Requests for authority to recover capital project and supply planning costs are appropriately reviewed in a full rate case.” Order No. 26,409 at 13 (Oct. 6, 2020).
3. By this motion, EnergyNorth is following the Commission’s directive and is presenting for review in this docket the Company’s request for approval to recover the Granite Bridge

Project Costs.

4. In support of this request, the Company is filing with this motion the *Supplemental Direct Testimony of Francisco C. DaFonte and William R. Killeen and Steven E. Mullen* (the “Supplemental Testimony”). The Supplemental Testimony provides evidence demonstrating the prudence of the Company’s decisions that led to the Granite Bridge Project Costs.
5. Note that this request does not change the Company’s proposed revenue requirement for temporary or permanent rates. Rather, the Company seeks recovery of the Granite Bridge Project Costs through a reconciling charge within the Local Distribution Adjustment Clause. Therefore, this filing does not give rise to the need to amend the existing testimony and schedules that were filed in support of the proposed changes to distribution rates.
6. The Company has discussed with Commission Staff and the Office of the Consumer Advocate measures that will ensure the smooth integration of this issue into the existing procedural schedule and preserve the hearing dates now scheduled for late May and early June 2021. Those measures include the Company’s agreement to provide Audit Staff with immediate access to the documentation supporting the Granite Bridge Project costs.

WHEREFORE, EnergyNorth respectfully requests that the Commission:

- A. Grant this motion to amend the petition in this docket; and
- B. Grant 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: November 20, 2020

By: _____

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Certificate of Service

I certify that on November 20, 2020, a copy of this Motion has been electronically forwarded to the service list.



Michael J. Sheehan