

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 20-152

LIBERTY UTILITIES (ENERGYNORTH GAS) CORP. d/b/a

LIBERTY UTILITIES—KEENE DIVISION

Winter 2020-2021 Cost of Gas

**COMMISSION STAFF’S OBJECTION TO LIBERTY’S MOTION FOR REHEARING
OF ORDER No. 26,480**

Commission Staff (Staff) respectfully object to Liberty Utilities (EnergyNorth Gas) Corp. d/b/a Liberty Utilities – Keene Division’s *Motion for Rehearing of Order No. 26,480*.

In support of this motion, Staff states as follows:

1. Liberty Utilities (EnergyNorth Gas) Corp. d/b/a Liberty Utilities- Keene Division (Liberty Keene, Liberty, or the Company) is seeking a rehearing of Order No. 26,480 (May 14, 2021) (the Order disallowing historic CNG demand charges) (hereinafter the “Historic Demand Charges Order” or “HDC Order”).¹ See RSA 541:3; NH Admin R. Puc 203.07 (f) and 202.03 (five business days for Staff to file objection).
2. In the HDC Order, the Commission disallowed recovery for 26 months of compressed natural gas (CNG) demand charges during the period August 2017 through September 2019. During the 26 months, Liberty Keene was unable to serve CNG to a single customer. HDC Order No. 26,480 at 5. The Company does not contest the disallowance of demand charges for the ten-month period August 2017 through April 30, 2018. Liberty Keene Motion for Rehearing (Mot. Rehearing) at 3.

¹ The Historic Demand Charges Order (HDC Order) is available on the Commission’s website at https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-152/ORDERS/20-152_2021-05-14_ORDER_26480.PDF.