

STATE OF NEW HAMPSHIRE

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PUBLIC UTILITIES COMMISSION

21 S. Fruit St., Suite 10
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April 21, 2021

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

Re: Docket # DG 21-050
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Keene Division
Summer 2021 Cost of Gas
Staff Motion to Compel Liberty to Respond to TS 1-1 and TS 1-3

Dear Ms. Howland:

On behalf of Staff of the Public Utilities Commission (Staff), enclosed please find Staff's Motion to Compel Response to TS 1-1(d) and TS 1-3, Items 1, 2, 3, 11, 16-20, 22, 27-28, by providing responsive narrative answers, annotated photographs and annotated site plans.

Pursuant to the Commission's March 17, 2020 secretarial letter, Staff is making an electronic filing without a hard copy equivalent.

Thank you for attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Mary E. Schwarzer

Mary E. Schwarzer
Staff Attorney

Discovery Service List (electronically)