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November 16, 2021

Via Electronic Mail Only

Commissioner Daniel Goldner
Public Utility Commission
21 S. Fruit Street
Concord, NH 03301-2429

Re: DG 21-130 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty
Energy's comments re: Liberty's November 15, 2021 compliance filing

Dear Commissioner Goldner:

I write on behalf of the Department of Energy, (Energy) with regard to a compliance filing Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty (Liberty or the Company) made on November 15, 2021, in an undated cover letter, enclosing what purport to be compliance tariff pages for "First Revised Pages 5, 87, 89, 91, 92, 94, 95, 96, 98, 99, 100, 101, 153 and 154," and "Fourth Revised Page 1, 3, and 4."

Energy has several concerns with the filing made by Liberty and reserves the right to raise other concerns in the future. These concerns are summarized as follows.

First, Liberty has indicated these compliance pages are part of Liberty's Tariff No. 11. See upper left-hand corner of each tariff page ("NHPUC No. 11 Gas/ Liberty Utilities") As the Commission recently memorialized in Order 26,541 at 6-8 (October 29, 2021), parties in this docket disagree as to whether Liberty's Tariff No. 11, has been found fully compliant by the Public Utilities Commission (PUC); arguably Tariff No. 10 may remain in effect. See also Dkt. No. DG 21-105, "Letter of Non-Compliance" from PUC Tariff Administrator, filed September 13, 2021. (Discussing RDAF). If the PUC finds tariff pages filed in Docket DG 21-130 accurate for cost of gas (COG) matters resolved in Order 26,541, Energy asks the PUC to explicitly note that Tariff No. 11 (which purports to be effective August 1, 2021) has yet to be found fully compliant.

Finally, Energy notes that the red-lined tariff pages do not include any redlined figures, only red-lining headers and footers (even in electronic form). Thus, Liberty's red-lined pages appear incomplete.

Pursuant to the Commission's March 17, 2020, secretarial letter, Energy is filing only electronic versions of this letter.

Thank you for your consideration of these matters.

Respectfully Submitted,

/s/ Mary E. Schwarzer

Mary E. Schwarzer
Attorney/Hearings Examiner

Cc: Service List (electronically)