

STATE OF NEW HAMPSHIRE

CONSUMER ADVOCATE  
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May 24, 2022

New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301

Re: Docket No. DG 21-130  
Energy North Natural Gas Corp. d/b/a Liberty  
Cost of Gas Proceeding

To the Commission:

The Office of the Consumer Advocate (“OCA”) is in receipt of a pleading filed yesterday in the above-referenced docket by the Department of Energy. The pleading objects to the May 20, 2022 request of the subject utility for expedited consideration of a significant increase in its COG (cost of gas) rate for effect just six working days later, on June 1, 2022.

Please be advised that the OCA shares the Department’s concern about the timing of the utility’s filing and agrees with the Department’s requests as they are enumerated on pages 8 and 9 of its pleading.

We express this view with considerable reluctance. In the end, it will be the customers of Energy North Natural Gas Corporation d/b/a Liberty (“Liberty”) who will bear the brunt of such a jaw-dropping increase in the utility’s cost of gas. Deferring the effective date of the rate increase by a month will only exacerbate the rate shock. But, like the Department, we are concerned about the extent to which customers of Liberty are entitled to advance warning of this drastic increase. Indeed, we ask the Commission to take whatever steps it deems necessary to assure that customers are made aware immediately that this profoundly unwelcome development is in the offing.

Given trends in the market for natural gas futures, it is virtually certain that winter-period COG rates – and, for that matter, default energy service rates -- will increase later this year at so astonishing a level as to constitute a crisis of affordability and public confidence. In these circumstances, we urge the Commission to set expectations as to timing and customer notification that will provide adequate warning to the state’s natural gas and electric customers of

just how difficult the coming winter is likely to be. The decision you make at this juncture in this docket will set a significant precedent in that regard.

Thank you for considering our perspective as you consider the Department's requests.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DKreis', written in a cursive style.

Donald M. Kreis  
Consumer Advocate

cc: Service List