



OFFICE OF THE CONSUMER ADVOCATE

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June 1, 2022

New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301Re: Docket No. DG 21-130
Energy North Natural Gas Corp. d/b/a Liberty
2021-2022 Cost of Gas Proceeding
Order No. 26,632

To the Commission:

I write, on behalf of the residential utility customers whose interests are represented by the Office of the Consumer Advocate (“OCA”), to express grave concerns about Order No. 26,632, entered in the above-referenced docket on May 26, 2022. This submission is deliberately *not* styled as an RSA 541:3 motion for rehearing because there are no circumstances in which the OCA would pursue appellate remedies in connection with Order No. 26,632. Nevertheless, the OCA cannot ignore how poorly the residential customers of Energy North Natural Gas Corp. d/b/a Liberty (“Liberty”) are served by this order.

As you know, in Order No. 26,632 concerns a proposed increase in Cost of Gas (“COG”) charges filed by Liberty on May 20, 2022 for effect just 11 days later, on June 1, 2022 (tab 64). As noted in the order, the Commission-approved maximum summer COG rate applicable to residential customers of Liberty is presently \$0.6984 per therm. Liberty proposes a drastic increase to \$1.2295 per therm. The Department of Energy objected to the abrupt timing of such a significant increase (tab 65) and we reluctantly supported the Department’s position (tab 66) given that deferring the effective date to July 1, 2022 as requested by the Department would only exacerbate the rate shock Liberty customers will experience given that Liberty’s prudently incurred COG costs are fully recoverable from ratepayers.

Order No. 26,632 acknowledged the rate shock problem but the Commission then administered a shock of a different sort by suspending the newly filed tariff for *three months*, making August 20, 2022 the earliest date on which a new summer COG rate could take effect. The Commission scheduled a hearing for July 13, 2022 and stated an intention to conduct a thorough inquiry. “The Order noted that “[t]he Commission does not have availability for the late-June hearing dates specified by the [Department].” Order No. 26,632 at 3.

The OCA understands that it is now summertime and that all three energy-related agencies at 21 South Fruit Street – the Commission, the Department, and the OCA – deserve, after a busy fall, winter, and spring, the opportunity to relax the pace and, presumably, allow employees to enjoy some vacation. But, from the standpoint of both natural gas and electric customers, New Hampshire is entering a period of crisis that (in light of trends in futures markets) is only likely to grow worse as the winter heating season approaches.

The magnitude of this crisis is laid bare at Bates page 52 of the schedules accompanying Liberty's May 20 filing, identified as page 1 of Schedule 8 to that filing. Liberty is now proposing a COG rate that will increase the typical bill of a residential heating customer by more than 54 percent compared to a year ago. Considered alone, COG charges are proposed to increase by a whopping 212 percent over 2021 levels. This is *not* what DuBose Heyward had in mind when he wrote the poem that contributed the lyrics to "Summertime," the immortal song from the 1935 opera *Porgy and Bess* by George and Ira Gershwin.

In these circumstances, New Hampshire's citizens – and, most assuredly, the state's ratepayers – might reasonably expect us energy-related public servants to incur some inconvenience and reshuffle our schedules (including, perhaps, events related to less pressing dockets) so as to make the drastic rate increases ahead an urgent priority.

Therefore, the OCA respectfully requests that the Commission reconsider its unwillingness to hear the above-referenced matter in late June with an eye toward implementing new COG rates for Liberty on July 1, 2022. Thank you for considering our request.

Sincerely,

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

Donald M. Kreis
Consumer Advocate

cc: Service List