

STATE OF NEW HAMPSHIRE

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July 27, 2022

Via Electronic Mail Only

Daniel Goldner
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Dkt. No. DG 21-130 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty
Winter 2021/2022 Cost of Gas Filing and Summer 2022 Cost of Gas Filing,
EnergyNorth's July 22, 2022 Trigger Filing is Incomplete

Dear Chairman Goldner:

I write on behalf of the Department of Energy (DOE) to bring to the Commission's attention the fact that EnergyNorth's July 22, 2022 trigger filing is incomplete. EnergyNorth has not included projected over/under calculations, or the percentage of total revised anticipated cost of gas (COG) for the Summer 2022 season that the projected calculation should represent. The July 2022 NYMEX settled forward prices date upon which those calculations were to be based is also missing. The information at issue is required by Order No. 26,541 at 12 (October 29, 2021). The missing information is of significant assistance to the DOE in tracking the Summer 2022 overall cost of gas, and is standard content for trigger filings.

DOE, by email, asked EnergyNorth to provide the missing information on Monday, July 25, and renewed the request near the close of business on July 26. EnergyNorth replied on July 26, stating that "typically" EnergyNorth does not "file a calculation in the first approved month of the rate." As demonstrated by citations provided below, typically EnergyNorth provides the requested information for the first month of the summer season. For example, the referenced information was provided in the past for rates effective May 1, the first month of the Summer season. *See, e.g.,* Dkt. No. DG 21-130, Tab 59, trigger filing dated April 25, 2022, with rate to be effective May 1, 2022, the first month of the Summer season (under collection projected as 64.79% of the total revised anticipated gas costs); Dkt. No. DG 20-141, Tab 27, trigger filing dated April 23, 2021, with rate to be effective May 1, 2021 (under collection projected at 15.58% of the total revised anticipated gas costs).¹

¹ DOE shared the citations with Liberty this morning, and renewed DOE's request that the information be provided promptly.

Accordingly, the fact that August 2022 is the first month of the mid-season COG rate change, *see* Order No. 26,649 (July 15, 2022), does not relieve EnergyNorth from providing the missing information.²

DOE wishes to bring the missing information to the Commission's attention, and respectfully asks the Commission to direct EnergyNorth to provide the data required to complete EnergyNorth's standard trigger filing. *See* Order No. 26,541 at 12. DOE has three business days to review trigger filings, and the deadline for July 2022 is today. *Joint Report on LDAC and COG Proceedings* (EnergyNorth) at 3.

Thank you for your attention to this matter,

/s/ Mary E. Schwarzer

Mary.E. Schwarzer
Staff Attorney/Hearings Examiner
Department of Energy

Docket (electronic service)

² The only exception is that no October trigger filing is made for rates effective November 1 since November is the start of the new COG year.