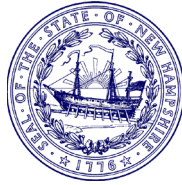


STATE OF NEW HAMPSHIRE

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October 14, 2021

Via Electronic Mail Only

Dianne Martin, Chairwoman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

Re: Docket DG 21-130 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty  
Winter 2021/2022 Cost of Gas and Summer 2022 Cost of Gas,  
*Energy Join Motion in Limine/ Bifurcate*

Dear Chairwoman Martin:

On behalf of the Department of Energy (Energy) enclosed please find Energy's motion, joining, in part, the relief requested in the Office of the Consumer Advocate's "Motion in *Limine* Seeking Prehearing Determination that Liberty's Request to Recover \$4 million Constitutes Illegal Retroactive Rate Making." In the Alternative, Energy's motion proposes that the Public Utilities Commission bifurcate the hearing, remove the \$4 million at issue from the current cost of gas calculation, and schedule a subsequent hearing, if necessary.

Respectfully Submitted,

/s/ *Mary E. Schwarzer*

Mary E. Schwarzer  
Attorney/Hearings Examiner

Cc: Discovery Service List (electronically)

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