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November 16, 2021

Via Electronic Mail Only

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

Re: DG 21-132 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a
Liberty-Keene Division, *Energy's comments re: Liberty's November 15, 2021
compliance filing*

Dear Chair 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-Keene Division (Liberty-Keene or Company) made on November 15, 2021, in an undated cover letter enclosing what purport to be compliance tariff pages "First Revised Page 97" and "Third Revised Pages 1, 3, 4 and 88" of Tariff No. 11.

Energy has several concerns with Liberty-Keene's filing, and reserves the right to raise other concerns in the future. Energy's concerns are summarized below. They are essentially the same concerns Energy raised in Docket DG 21-130 because the LDAC established in that docket is applicable in this docket.

First, Liberty-Keene has indicated these compliance pages are part of the Company'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) (Docket No. DG 21-130), parties in this docket, Docket No. DG 21-132, 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 that tariff pages filed in Docket DG 21-132 are accurate for cost of gas (COG) matters resolved in Order 26,542, 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. See Order 26,542 at 4-6, 7 (October 29, 2021).

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 or "annotated" 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 Lists (electronically)