

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 22-015

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY

Keene Division Summer 2022 Cost of Gas

Expedited Motion for Clarification of Order No. 26,615

Liberty Utilities (EnergyNorth Natural Gas), Corp. (“Liberty”), through counsel, respectfully moves the Commission for clarification of Order No. 26,615 (April 22, 2022) which suspended the proposed Summer 2022 cost of gas (“Summer COG”) tariff pages (the “April Order”) pending further hearing on May 17, 2022. Specifically, Liberty seeks clarification of which Cost of Gas rate should take effect for Keene customers as of May 1.

In support of this motion, Liberty states as follows:

1. Liberty sets COG rates on a seasonal basis. Winter COG rates are for the period November through April. Summer COG rates are for the period May through October. Each year, the Commission approves an initial set of rates proposed by Liberty for each season that are then adjusted during the course of that season to reflect changes in the market price of gas and other factors.

2. The current COG rate for Liberty’s Keene Division is \$2.4835 per therm and will be in effect through April 30, 2022. The current rate covers the end of the Winter period.

3. Liberty filed its initial request for the Keene Division Summer COG rates on March 15, 2022, proposing a new rate of \$1.6643 per therm to be effective on May 1, 2022. Based on

the Commission's March 29, 2022, Commencement of Adjudicative Proceeding and Notice of Prehearing Conference and Hearing, the Commission scheduled a hearing for April 26, 2022, on this proposed rate change.

4. At the April 4, 2022, prehearing conference, the Commission asked the parties to provide the Commission with the Department of Energy (the "Department") Audit Division's report of the 2021 Summer Period Reconciliation and the Excel file that supported that reconciliation. The Commission followed the prehearing conference with an April 6, 2022, Procedural Order Re: Filing Deadlines that stated, "By April 15, 2022: The NHDOE and Liberty Keene are requested to coordinate to file a copy of the NHDOE's audit report regarding Liberty Keene's proposed Summer 2022 Cost of Gas (COG) rate calculations¹; if the audit is confidential, both confidential and redacted versions shall be provided. Liberty Keene shall file its Keene COG model/live Excel schedules²." Liberty inadvertently missed the April 15 filing date and subsequently filed the Audit Report and requested Excel file with the Commission on April 21, thereby prompting the Commission's April 22 Order.

5. Liberty now seeks clarification of the April 22 Order with regard to which rate should take effect as of May 1, 2022, since the proposed Summer COG rate has been suspended. The three most likely options, in the Company's view, would be to implement one of the following rates:

¹ The Audit Report in question is the Keene Summer 2021 Reconciliation Audit Report. There has not been an audit of the Keene Summer 2022 Reconciliation at this time.

² The Commission confirmed at the prehearing conference that the Excel model to be provided was "the Excel model of the reconciliations submitted to the Audit Division." Transcript of April 4, 2022, prehearing conference, at 29.

- First, the proposed Summer COG rate of \$1.6643 per therm.
- Second, the previous Summer COG rate of \$1.1821, which was approved for the Summer 2021 season in Order No. 26,465 (April 30, 2021).
- Third, the current rate now in effect of \$2.4835 per therm (which the Company could adjust downward as of June 1 if necessary).

In each of these instances, or for any other rate that Liberty would be directed to implement, the difference in that rate and the one that is subsequently approved by the Commission on a final basis would be reconciled at the next COG proceeding. Of the three shown above, Liberty believes that implementing the first option would create the smallest reconciliation and, thus, the least impact on customers.

6. Finally, if the Commission determines it to be beneficial, the Company remains available on April 26 to meet with the Commission and parties in a further prehearing conference to address the issues in this motion and other issues relevant to this Keene Summer 2022 COG proceeding.

WHEREFORE, Liberty respectfully request that the Commission:

- a. Clarify Order No. 26,615 by indicating which rates should take effect as of May 1, 2022;
- b. Conduct a further prehearing conference in this docket on the prior hearing date of April 26, 2022, if helpful to the Commission, and;
- c. Grant any other relief deemed just and proper.

Respectfully submitted,
Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a
Liberty

By its Attorney,



Date: April 25, 2022

By:

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Certificate of Service

I hereby certify that on April 25, 2022, a copy of this Motion has been forwarded to the service list.



Michael J. Sheehan