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August 4, 2022

Via Electronic Mail Only

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

**Re: DE 22-024; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Default Service Request for Proposals for the Six-Month Period August 1, 2022, to
January 31, 2023, for both the Large Customer Group and the Small Customer Group**

Dear Chairman Goldner:

On behalf of Liberty Utilities (Granite State Electric) Corp., and in response to the Commission's letter of noncompliance dated July 29, 2022, enclosed please find clean and redlined versions of the compliance tariff in this matter.

The Company will certainly comply with the Commission's request to include redlined versions in all future compliance tariff filings, but I note that the Company reasonably interpreted the rule to only require redlined versions with the initial filing and not to require redlined versions with the compliance tariff. Puc 1603.05(b) governs the initial filing and states: "Each utility filing a proposed rate change shall file with the commission an original and 2 copies of the tariff pages containing the rate changes, on which additions and deletions shall be clearly annotated or marked." (Emphasis added.) Puc 1603.05(d), which the Company interprets to govern compliance filings in light of the highlighted language, contains no similar requirement: "Upon the commission's approval of a tariff revision pursuant to Puc 200, the utility shall file a complete updated electronic copy of its newly revised tariff." Subsection (d)'s silence as to an annotated tariff, as compared to its inclusion in subsection (b), suggested to Liberty that the compliance filing need only include the specified "newly revised tariff."

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this letter will be filed. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Enclosures

Cc: Service list