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February 24, 2023

Via Electronic Mail Only

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

**Re: Docket No. DE 22-024; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
2022 Default Service Solicitations**

Dear Chairman Goldner:

On behalf of Liberty Utilities (Granite State Electric) Corp., enclosed please find the *Technical Statement of James M. King*, with attachments, and the *Technical Statement of John D. Warshaw*, with attachments, which seek Commission approval of lower energy service rates for the Large Customer Group for the balance of the Block A period, March 1 through April 30, 2023.

The Company asserts confidentiality of the appropriately marked information pursuant to Puc 201.06(a)(15), as governed by the procedures described in Puc 201.06 and Puc 201.07.

Finally, The Company also seeks a waiver of Puc 1603.05(a)(1), which states: "A utility that proposes to revise an existing tariff shall submit ... [t]he entire page on which any revision occurs." The Company notes that compliance tariff pages following earlier hearings in this docket are still under review and have not yet been approved, and yesterday the Commission approved another rate change for effect March 1, with the requirement that the Company file compliance pages within 20 days. Order No. 26,777 (Feb. 23, 2023).

The Commission "shall waive the provisions of any of its rules ... if the commission finds that: (1) The waiver serves the public interest; and (2) the waiver will not disrupt the orderly and efficient resolution of matters before the commission." Puc 201.05(a). When considering whether a waiver request serves the public interest, "the commission shall waive a rule if ... [t]he purpose of the rule would be satisfied by an alternative method proposed." Puc 201.05(b).

A waiver is in the public interest because proposed tariff pages will likely cause confusion given the overlapping rate changes in recent weeks. A waiver will not disrupt resolution of this docket. The

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proposed rate change in this filing is discreet and has relatively few impacts on other rates, thus the absence of proposed tariff pages will not hamper the Commission's or the parties' ability to understand the proposed changes. Finally, the purpose of the rule can be satisfied through the requirement that the Company promptly file compliance tariff pages following an order on this filing.

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