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November 28, 2022

Daniel C. Goldner, Chairman
Public Utilities Commission
21 S. Fruit Street
Concord, NH 03301-2429

Re: DG 22-045 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a/
Liberty Winter 2022-23 and Summer 2023 Cost of Gas, *DOE Position
on Liberty's trigger filing with rate changes and tariff pages proposed to be
effective December 1, 2022.*

Dear Chairman Goldner:

The Department of Energy (DOE) files this letter to state DOE's position on Liberty's trigger filing, dated November 23, 2022, proposed to be effective December 1, 2022. For the reasons explained below, DOE recommends that a parenthetical be added to the order cited in the footers on proposed Tariff No. 11's Seventeenth Revised Page 87, Seventeenth Revised Page 89, and Eighth Revised Page 95.

In the trigger filing, proposed to be effective December 1, 2022, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty ("Liberty" or "the Company") has lowered the non-FPO cost of gas and filed revised tariff pages accordingly, to account for a projected over collection of approximately \$14,160,610 or 12.75% of the total revised anticipated gas costs for the 2022-23 winter season, were costs not adjusted. *See* Liberty's November 23, 2022 filing.

DOE notes that Liberty's proposed Seventeenth Revised Page 87 and Seventeenth Revised Page 89 use the LDAC rates Liberty proposed in its November 15, 2022 filing, and not the LDAC rates reviewed and approved by the PUC in Order No. 26,715 (October 31, 2022). While DOE agrees with Liberty's proposed changes to lower the LDAC rates, *see* DOE letter filed November 22, 2022, DOE recommends that Liberty add a parenthetical to the order cited in the footer of those pages to signal that the Commission has yet to approve Liberty's proposed correction. DOE further notes that the tariff pages at issue also use Liberty's proposed corrected C&I High winter use and C&I Low winter use rates, and not the rates for those customers as approved in Order No. 26,715 by customer class. DOE also agrees with Liberty's proposed changes (reversal) to the C&I rates. *See* DOE's November 22, 2022 filing. Therefore, DOE recommends that Liberty add the following parenthetical to the order cited in the footers, ". . . (modified as proposed by Liberty in the Company's November 15, 2022 filing)."

DOE notes that Liberty's proposed Tariff No. 11 Eighth Revised page 95 also uses Liberty's proposed corrected C&I High winter use and C&I Low winter use rates, and not the rates for those customers as approved in Order No. 26,715 by customer class. DOE recommends the same footer for Tariff No. 11 Eight Revised Page 95 that was recommended for the prior pages. Specifically, DOE recommends the citation for the footer include the following parenthetical: “. . . (modified as proposed by Liberty in the Company's November 15, 2022 filing).”

Consistent with the Commission's current policy, this letter is being filed solely in electronic format. Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Mary E. Schwarzer

Mary.E. Schwarzer
Staff Attorney/Hearings Examiner
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Cc: Docket (electronic service)
Enclosures

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