



Craig A. Holden
Rates Analyst III, Rates & Regulatory Affairs
15 Buttrick Rd.
Londonderry, NH 03053
603-704-0308
Craig.Holden@libertyutilities.com

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Via Electronic Mail

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

Dear Chairman Goldner:

**Re: DG 22-045; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty
Winter 2022-2023 Cost of Gas**

**Re: DG 22-057; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty-Keene
Division
Winter 2022-2023 Cost of Gas**

On November 30, 2022, the New Hampshire Public Utilities Commission (the "Commission") issued Order No. 26,737 In Docket Nos. DG 22-045 and DG 22-057. Liberty-Keene Division (the "Company") was directed to remove "the changes to Liberty's Keene division Summer 2023 rates, which were not established by Order No. 26,716." Also, the corrected "LDAC per therm rates effective for services rendered on or after November 1, 2022, through October 31, 2023, are \$0.1086 and \$0.0872 for residential and C&I customers respectively, subject to interim adjustment of the LDAC" were confirmed. There was also a correction to the C&I High and Low winter and summer rates specifically for Liberty (excluding Keene).

On December 29, 2022, the Department of Energy ("DOE") filed a position letter on the tariff pages submitted December 29, 2022. The DOE's opinion that the tariff pages were non-compliant was based on three issues.

1. Tariff pages included summer rates that were not approved for Liberty Keene.
2. Summer period was incorrectly defined as October 1 through October 31.
3. Footers are incomplete because Order Nos. 26,737 cannot be cited independently.

The summer period defined on tariff page 88 was for the last approved rates from October 1, 2022 – October 31, 2022, and not for the upcoming summer of May 1, 2023 – October 31, 2023.

On December 30, 2022, the Commission issued Procedural Order Re: Utilities December Cost of Gas Adjustment Filings finding "both utilities' December 22, 2022, tariff filings provisionally non-



compliant". Also, "Liberty and Liberty-Keene should file responses to the DOE's letters on or before January 6, 2023."

The Company has had discussions with the DOE and will submit revised tariff pages for the following five filings on or before January 13, 2023. This is necessary to provide a correct starting point on which to subsequently reference prior revision numbers and changes.

- DG 22-057 Cost of Gas for Winter 2022-2023 (rates effective 11/01/2022)
- DG 22-045 Cost of Gas adjustment for December 2022 (rates effective 12/01/2022)
- DG 22-057 Cost of Gas adjustment for December 2022 (rates effective 12/01/2022)
- DG 22-045 Cost of Gas adjustment for January 2022 (rates effective 01/01/2023)
- DG 22-057 Cost of Gas adjustment for January 2022 (rates effective 01/01/2023)

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/Craig A. Holden

Craig A. Holden

Cc: Service List