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July 10, 2023

Via Electronic Mail Only

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

Re: Docket No. DG 22-045; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Winter 2022-2023 and Summer 2023 Cost of Gas, DOE Concerns re Company Trigger Filing Proposed Effective July 1, 2023

Dear Chairman Goldner:

On June 28, 2023, the Department of Energy ("DOE") issued a letter to the Public Utilities Commission ("Commission") stating that it has concerns about Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty's ("Liberty") recent trigger filing proposed to be effective July 1, 2023. Specifically, the DOE asked that Liberty includes within the footer of every tariff page a historical listing of all docket numbers associated with the contents of each page. For the reasons set forth below, Liberty feels this request is unreasonable and Liberty proposes an alternative solution to address DOE's concerns

Liberty files compliant tariff revisions with reference to the most recent Commission authorization(s), where applicable, and has not received a complaint from the Commission, former Commission Staff, or anyone else. The DOE states that the reason for its requested change is that DOE no longer has access to the tariff database that is accessible to the Commission and that keeping track of this information would be time-consuming for DOE to recreate.

However, following the DOE's suggestion would be confusing to all readers and administratively burdensome for Liberty. Some tariff pages contain a wide range of information and/or rates that are authorized in various dockets by many different orders. Providing a lengthy list of the dockets and orders authorizing each rate or tariff component in the footer of each tariff page would only add confusion for the reader. Additionally, maintaining this historical list of dockets would be a time-consuming task for Liberty's tariff administrator. Attached is a sample tariff page following DOE's proposal.

Chairman Daniel Goldner
July 10, 2023

Also, note that the most applicable rule does not require a series of citations for each tariff page. Puc 1603.06(m) states:

(m) When the commission approves a complete new tariff, the utility shall file a title page with the following information displayed at the bottom of the page:

- 1) A statement, which shall include the information required by (2) through (4) below, that the tariff is "Authorized by NHPUC Order No. in Docket No. , dated .";
- (2) The order number which approves the tariff;
- (3) The commission docket number of the case; and
- (4) The date of the order approving the tariff.

(Emphasis added.) And Puc 1603.06(o), which is the provision applicable here, states: "When the commission approves revised tariff pages to be inserted within the existing tariff, the utility shall file each revised page, bearing the notation as described in (m) (1) above" (emphasis added).

The "notation described in (m)(1) above" calls for a single order number, a single docket number, and a single date of the order. The rule does not require each tariff page to include a history of all orders that approved various portions of that page.

To the extent DOE wishes to change what information utilities should include on their tariff pages, Liberty suggests it is a conversation that should include all utilities, not just Liberty.

Finally, if the DOE is unable to recreate a tariff database like the one it previously utilized or to regain access to the existing database, Liberty is not opposed to finding an alternative solution that provides the DOE with the information it requires more efficiently and effectively. With that in mind, Liberty is willing to provide the DOE with a workbook of rates and associated Docket Numbers where each rate was approved, which Liberty believes to be the information DOE wishes to see. (Liberty has forwarded a sample of such a workbook to DOE for their review.) The DOE's current request, however, simply transfers an administrative burden to Liberty while adding unnecessary confusion to all readers of the tariff.

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

Sincerely,



Michael J. Sheehan

Attachment

Cc: Service List

22 FIRM RATE SCHEDULES - EXCLUDING KEENE CUSTOMERS

II RATE SCHEDULES

	Rates Effective April 1, 2023 - April 30, 2023 Winter Period				Rates Effective June 1, 2023 - October 31, 2023 Rates Effective July 1, 2023 - October 31, 2023 Summer Period			
	Delivery Charge	Cost of Gas Rate Page 95	LDAC Page 101	Total Rate	Delivery Charge	Cost of Gas Rate Page 92	LDAC Page 101	Total Rate
Residential Non Heating - R-1								
Customer Charge per Month per Meter	\$ 15.39			\$ 15.39	\$ 15.39			\$ 15.39
All therms	\$ 0.5129	\$ 0.1326	\$ 0.1113	\$ 0.7568	\$ 0.5129	\$ 1.2071	\$ 0.1180	\$ 1.8380
						\$ 1.2438		\$ 1.8747
Residential Heating - R-3								
Customer Charge per Month per Meter	\$ 15.39			\$ 15.39	\$ 15.39			\$ 15.39
Therms in the first block per month at	\$ 0.6519	\$ 0.1326	\$ 0.1113	\$ 0.8958	\$ 0.6519	\$ 1.2071	\$ 0.1180	\$ 1.9770
						\$ 1.2438		\$ 2.0137
Residential Heating - R-4								
Customer Charge per Month per Meter	\$ 8.47			\$ 8.47	\$ 15.39			\$ 15.39
Therms in the first block per month at	\$ 0.3585	\$ 0.0729	\$ 0.1113	\$ 0.5427	\$ 0.6519	\$ 1.2071	\$ 0.1180	\$ 1.9770
						\$ 1.2438		\$ 2.0137
Commercial/Industrial - G-41								
Customer Charge per Month per Meter	\$ 63.30			\$ 63.30	\$ 63.30			\$ 63.30
Size of the first block	100 Therms				20 Therms			
Therms in the first block per month at	\$ 0.5088	\$ 0.1327	\$ 0.0890	\$ 0.7305	\$ 0.5088	\$ 1.2074	\$ 0.0957	\$ 1.8119
						\$ 1.2441		\$ 1.8486
All therms over the first block per month at	\$ 0.3550	\$ 0.1327	\$ 0.0890	\$ 0.5767	\$ 0.3550	\$ 1.2074	\$ 0.0957	\$ 1.6581
						\$ 1.2441		\$ 1.6948
Commercial/Industrial - G-42								
Customer Charge per Month per Meter	\$ 189.84			\$ 189.84	\$ 189.84			\$ 189.84
Size of the first block	1000 Therms				400 Therms			
Therms in the first block per month at	\$ 0.4634	\$ 0.1327	\$ 0.0890	\$ 0.6851	\$ 0.4634	\$ 1.2074	\$ 0.0957	\$ 1.7665
						\$ 1.2441		\$ 1.8032
All therms over the first block per month at	\$ 0.3212	\$ 0.1327	\$ 0.0890	\$ 0.5429	\$ 0.3212	\$ 1.2074	\$ 0.0957	\$ 1.6243
						\$ 1.2441		\$ 1.6649
Commercial/Industrial - G-43								
Customer Charge per Month per Meter	\$ 811.98			\$ 811.98	\$ 811.98			\$ 811.98
All therms over the first block per month at	\$ 0.2863	\$ 0.1327	\$ 0.0890	\$ 0.5080	\$ 0.1441	\$ 1.2074	\$ 0.0957	\$ 1.4472
						\$ 1.2441		\$ 1.4839
Commercial/Industrial - G-51								
Customer Charge per Month per Meter	\$ 63.38			\$ 63.38	\$ 63.38			\$ 63.38
Size of the first block	100 Therms				100 Therms			
Therms in the first block per month at	\$ 0.3070	\$ 0.1322	\$ 0.0890	\$ 0.5282	\$ 0.3070	\$ 1.2068	\$ 0.0957	\$ 1.6095
						\$ 1.2435		\$ 1.6462
All therms over the first block per month at	\$ 0.2084	\$ 0.1322	\$ 0.0890	\$ 0.4296	\$ 0.2084	\$ 1.2068	\$ 0.0957	\$ 1.5109
						\$ 1.2435		\$ 1.5476
Commercial/Industrial - G-52								
Customer Charge per Month per Meter	\$ 189.57			\$ 189.57	\$ 189.57			\$ 189.57
Size of the first block	1000 Therms				1000 Therms			
Therms in the first block per month at	\$ 0.2647	\$ 0.1322	\$ 0.0890	\$ 0.4859	\$ 0.1978	\$ 1.2068	\$ 0.0957	\$ 1.5003
						\$ 1.2435		\$ 1.5370
All therms over the first block per month at	\$ 0.1836	\$ 0.1322	\$ 0.0890	\$ 0.4048	\$ 0.1219	\$ 1.2068	\$ 0.0957	\$ 1.4244
						\$ 1.2435		\$ 1.4611
Commercial/Industrial - G-53								
Customer Charge per Month per Meter	\$ 838.52			\$ 838.52	\$ 838.52			\$ 838.52
All therms over the first block per month at	\$ 0.1851	\$ 0.1322	\$ 0.0890	\$ 0.4063	\$ 0.0968	\$ 1.2068	\$ 0.0957	\$ 1.3993
						\$ 1.2435		\$ 1.4360
Commercial/Industrial - G-54								
Customer Charge per Month per Meter	\$ 839.19			\$ 839.19	\$ 839.19			\$ 839.19
All therms over the first block per month at	\$ 0.0705	\$ 0.1322	\$ 0.0890	\$ 0.2917	\$ 0.0409	\$ 1.2068	\$ 0.0957	\$ 1.3434
						\$ 1.2435		\$ 1.3801

DATED: ~~May 24, 2023~~ June 23, 2023

ISSUED BY: /s/Neil Proudman
Neil Proudman
TITLE: President

EFFECTIVE: June 1, 2023 July 1, 2023

Authorized by NHPUC Order No. 26,715 dated October 31, 2022, in Docket No. DG 22-045, and Order No. 26,737 dated November 30, 2022, in Docket Nos. DG 22-045, Order No. 26,808 dated April 28, 2023, in Docket No. DG 20-105, Order No. 26,676 dated August 31, 2022, in Docket No. DG 22-028, Order No. 26,579 dated February 10, 2022, in Docket No. DE 20-092, and NHPUC NiSi Order No. 26,745 dated December 14, 2022, in Docket No. DE 22-081 and RSA 374-F:3, VI-a (d)(2).

Authorized by NHPUC Order No. 26,715 dated October 31, 2022, in Docket No. DG 22-045