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September 28, 2023

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  
Response to DOE Position Statement on Trigger Filing eff. 10.1.23**

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty (the "Company") and in accordance with New Hampshire Public Utilities Commission (the "Commission") Order Nos. 26,715 (October 31, 2022) and 26,737 (November 30, 2022) in Docket No. DG 22-045, below is the Company's response to the New Hampshire Department of Energy's ("DOE or "the Department") position statement on the trigger filing for rates effective October 1, 2023.

On September 22, 2023, the Company filed its calculation for cost of gas rates effective October 1, 2023. The Company's current and revised cost of gas rates are listed in the table below. On September 26, 2023, the DOE filed a position statement asking the Company to confirm the maximum rates as identified in the Commission's Order No. 26,737. The maximum rates prescribed in the order are as follows: Residential \$1.28363 per therm, High Winter Use \$1.28388 per therm, and Low Winter Use \$1.28325 per therm.

The Company's Commission-approved tariff NHPUC. No. 11 Section 17 (L) "Application of COG to Bills" states, in part: "

The COGs (\$/therm) for each customer group for each season shall be calculated to the nearest hundredth of a cent per unit and will be applied to each customer's monthly sales volume within the corresponding customer classification.

(Emphasis added.) The Company did not inadvertently round to the nearest fourth place, as the DOE has suggested. Rather the Company provided the calculated rate to the nearest hundredth of a cent per unit as required by the Company's tariff. Therefore, the rates provided on September 22, 2023, for effect October 1, 2023, are appropriate and should be accepted as filed.



Cost of Gas Rates (\$ per therm)

	<u>Approved Rates</u>	<u>Revised Rates</u>	<u>Change</u>
Residential	\$0.7493	\$1.2836	\$0.5343
Residential Gas Assistance Plan	\$0.7493	\$1.2836	\$0.5343
Commercial/Industrial High Winter Use	\$0.7496	\$1.2839	\$0.5343
Commercial/Industrial Low Winter Use	\$0.7490	\$1.2833	\$0.5343

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

Sincerely,

/s/James M. King

James M. King

Enclosures

Cc: Service List