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September 1, 2022

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. DG 22-045; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Winter 2022–2023 and Summer 2023 Cost of Gas, LDAC filing

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty, enclosed for filing is the Supplemental Testimony of Erica Menard, with attachments, which updates the LDAC filing of August 2, 2022, in this docket.

Note that the parties' Joint Report filed December 27, 2021, in Docket DG. 21–130, which related to the timing and content of cost of gas and LDAC filings, included the following:

Fourth, when petitions are first filed, EnergyNorth agrees to make a good faith effort to identify any LDAC and COG issues that are likely too complex to be resolved in the compressed LDAC/COG schedule outlined above and to carve out those complex issues to be addressed on a separate timeline in this docket or in a separate docket, provided such separate treatment does not prejudice any party's rights. The Parties would then ask the PUC to approve a process to separately adjudicate such an issue on a different timeline.

Joint Report at 4.

The Company has identified two LDAC issues that it asks to be carved out because they are likely too complex to be resolved in the compressed LDAC/COG schedule and thus the Company asks that these issues be addressed on a separate timeline. The Department of Energy agrees with this request.

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The two issues are, first, the Company seeks recovery of approximately \$4.3 million through the RDAF to reconcile the 2021-2022 decoupling year. The Company seeks more time because the reasons for this substantial adjustment are complex and will require extra time to investigate and verify.

The second issue that the Company asks to be addressed on a different schedule is recovery of the costs Liberty incurred in 2021-2022 to stabilize the gas holder house in Concord, costs that Liberty proposes to recover through the environmental component of the LDAC. The Company seeks more time because these costs are of a different nature than the costs typically incurred to remedy the Company's manufactured gas production sites, the Company is continuing to gather relevant information, and this requires extra analysis and likely extra hearing time before the Commission.

Liberty asks that the Commission retain both of these issues within the existing docket, DG 22-045 and that the Commission schedule a separate hearing to address these two issues. The Company asks the Commission to direct the parties to collaborate and develop and propose a reasonable procedural schedule for the resolution of these carved out issues.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided. Thank you.

Sincerely,

Michael J. Sheehan

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Enclosures

Cc: Service List