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November 28, 2022

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

Re: DG 22-057 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a/
Liberty-Keene, *DOE's Position on Liberty-Keene'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-Keene's trigger filing, dated November 23, 2022, proposed to be effective December 1, 2022. For the reasons explained below, Twentieth Revised Page 88 should be resubmitted to strike what appear to be proposed Summer 2023 rates, and to include a reference to the EnergyNorth order establishing LDAC rates, as proposed for modification by Liberty EnergyNorth on November 15, 2022.

In its trigger filing, proposed to be effective December 1, 2022, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty-Keene, ("Liberty-Keene" or "the Company") has lowered the non-FPO cost of gas from \$2.1216 per therm to \$2.1118 per therm, and filed revised tariff pages accordingly. *See* Liberty-Keene filing dated November 23, 2022 (lowering rates by \$0.0098 per therm due to a projected over collection of approximately \$9,673 for the 2022-2023 winter season.)

DOE notes that Liberty's proposed Twentieth Revised Page 88 *Firm Rate Schedules Keene Customers* incorrectly identifies rates effective for the Summer 2023 period. Order No. 26,716 (October 31, 2022) in Docket No. DG 22-057 only established rates for Liberty-Keene's Winter period. Accordingly, Twentieth Revised Page 88 should be re-submitted, striking the section with Summer 2023 proposed rates.

DOE further notes that Order No. 26,716 applies the local distribution adjustment clause (LDAC) rates established by Order No. 26,715 in Docket No. DG 22-045. As discussed in DOE's letter filed in this docket on November 22, 2022, Liberty-Keene has altered the LDAC rates reviewed and approved by the PUC in Order No. 26,715. Accordingly, DOE recommends that Liberty-Keene add to the reference in the footer of proposed Twentieth [Tariff No. 11] Revised Page 88 to cite the EnergyNorth order establishing the LDAC rate for Liberty-Keene and to signal that the Commission has yet

to approve Liberty’s proposed correction, as follows “. . . and Order No. 26,715 (October 31, 2022) in Docket No. 22-045 (as proposed for modification by Liberty EnergyNorth on November 15, 2022).”

DOE notes Liberty’s trigger filing does not resolve a pending audit issue which DOE preserved for potential PUC review at the October 26, 2022, cost of gas hearing.

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
Department of Energy

Cc: Docket (electronic service)
Enclosures

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