



Michael J. Sheehan, Esq.

Director, Legal Services

Phone: 603-724-2135

Email: [Michael.Sheehan@libertyutilities.com](mailto:Michael.Sheehan@libertyutilities.com)

March 15, 2023

***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. DE 23-XXX; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty  
Vegetation Management Program — Calendar Year 2022 Reconciliation and Rate Adjustment  
Filing**

Dear Chairman Goldner:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, enclosed please Liberty's Calendar Year 2022 Reconciliation and Rate Adjustment Filing, which includes the pre-filed direct testimony of Heather Green, Anthony Strabone, and Heather Tebbetts, with attachments.

Please include the following on the service list in this matter:

- Heather Green [Heather.Green@libertyutilities.com](mailto:Heather.Green@libertyutilities.com)
- Anthony Strabone [Anthony.Strabone@libertyutilities.com](mailto:Anthony.Strabone@libertyutilities.com)
- Heather Tebbetts [Heather.Tebbetts@libertyutilities.com](mailto:Heather.Tebbetts@libertyutilities.com)
- James King [James.King@libertyutilities.com](mailto:James.King@libertyutilities.com)
- Erica Menard [Erica.Menard@libertyutilities.com](mailto:Erica.Menard@libertyutilities.com)
- Maureen Karpf [Maureen.Karpf@libertyutilities.com](mailto:Maureen.Karpf@libertyutilities.com)
- Karen Anne Sinville [KarenAnne.Sinville@libertyutilities.com](mailto:KarenAnne.Sinville@libertyutilities.com)

The Company also requests a waiver of the requirement to file proposed clean and redlined versions of the updated tariff pages due to the timing of the filing and will file clean and redlined versions of the updated tariff pages with the tariff compliance filing.

Puc 1603.05(a)(1) states: "A utility that proposes to revise an existing tariff shall submit ... [t]he entire page on which any revision occurs." The Company notes that tariff pages filed now to reflect how the requested rate changes vary from existing rates may not be accurate given the pending tariff

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pages in this and other dockets that the Commission has not yet determined to be compliant. Absent such a finding of compliance, the Company would either have to show changes to the last compliant pages (which is unreasonable and unhelpful given that the Commission has approved rate changes since then) or show changes to those pages that have not yet been found compliant (which may also change).

The Commission "shall waive the provisions of any of its rules ... if the commission finds that: (1) The waiver serves the public interest; and (2) the waiver will not disrupt the orderly and efficient resolution of matters before the commission." Puc 201.05(a). When considering whether a waiver request serves the public interest, "the commission shall waive a rule if ... [t]he purpose of the rule would be satisfied by an alternative method proposed." Puc 201.05(b).

The Company proposes an alternative to satisfy the intent of the rule by filing clean and redline tariff pages following the Commission's determination on the pending compliance pages and following resolution of the request in this docket. Those redlined tariff pages would clearly show the impact of this docket. The Company offers to file such pages within 5 days of the latter of an order in this docket and approval of the pending tariff pages.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Sheehan", with a stylized, cursive script.

Michael J. Sheehan

Enclosures

Cc: D. Maurice Kreis, Consumer Advocate  
Paul B. Dexter, Esq.  
OCA Litigation  
Energy Litigation