

STATE OF NEW HAMPSHIRE

COMMISSIONER
Jared S. Chicoine

DEPUTY COMMISSIONER
Christopher J. Ellms, Jr.



TDD Access: Relay NH
1-800-735-2964

Tel. (603) 271-3670

Website:
www.energy.nh.gov

DEPARTMENT OF ENERGY
21 S. Fruit St., Suite 10
Concord, N.H. 03301-2429

September 27, 2023

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

Re: DG 23-034 Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a/ Liberty, Summer 2023 Cost of Gas, *DOE's Position on Liberty Keene's "October 2023 COG Adjustment [proposed to be] effective 2023-10-01" (filed September 22, 2023)*

Dear Chairman Goldner:

The New Hampshire Department of Energy ("DOE" or "the Department") files this letter to comment on Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Keene ("Liberty Keene" or "the Company")'s "October 2023 COG Adjustment [proposed to be] effective 2023-10-01" (filed September 22, 2023). This position is based upon the analysis of Gas Director Faisal Deen Arif, Ph.D.

The Department notes that Liberty proposes an approximate 81.8 percent decrease in rates, moving the cost per therm effective September 1, 2023 for all Keene customer classes i.e., \$1.1464 per therm, to a revised rate of \$0.2091 per therm to be effective October 1, 2023. This issue is discussed below.

The Approximate 81.8 percent rate decrease

The New Hampshire Department of Energy ("DOE" or "the Department") is concerned with an 81.8 percent decrease that is not directly related to a precipitous drop in market rates. Upon inquiry, the Company's Regulatory Team has explained that it identified an error in the beginning balance of the 2023 Summer period that went undetected until this filing was made. When the error was identified, the Company concluded that a decrease in rates was merited to avoid a resulting projected over-collection of approximately \$85,276 for a customer population of approximately 1200. See Liberty Keene's September 22, 2023 filing. The DOE will investigate this error further in the pending docket, Docket No. DG 23-084, Liberty Keene's Winter 2023-2024 Cost of Gas filing. For the purposes of rates proposed to be effective October 1, 2023, because the proposed rate falls within the rates allowed by Commission Order No. 26,807 (April 25, 2023), and is reconcilable prospectively within this period, the DOE does not object to the proposed rate.

Summary

With the above caveat, so long as the Company imposes rates consistent with those permitted by the Commission in Order No. 26,807, the DOE does not object to the rates Liberty proposes to be effective October 1, 2023. As stated, DOE will continue to investigate the error Liberty/ Liberty Keene's Regulatory Department identified, including but not limited to its impact upon pending Docket No. DG 23-084.

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

ClerksOffice@puc.nh.gov
amanda.o.noonan@energy.nh.gov
deborah.gilbertson@libertyutilities.com
donald.m.kreis@oca.nh.gov
Energy-Litigation@energy.nh.gov
Erica.Menard@libertyutilities.com
Faisal.DeenArif@energy.nh.gov
James.King@libertyutilities.com
Joshua.Tilbury@libertyutilities.com
karen.sinville@libertyutilities.com
mary.e.schwarzer@energy.nh.gov
maureen.karpf@libertyutilities.com
michael.sheehan@libertyutilities.com
ocalitigation@oca.nh.gov
thomas.c.frantz@energy.nh.gov