

STATE OF NEW HAMPSHIRE

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May 1, 2023

New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301

Re: Docket No. DE 23-039  
Liberty Utilities (Granite State Electric) Corp.  
Distribution Service Rate Case

To the Commission:

The Office of the Consumer Advocate (“OCA”) is in receipt of the full rate case submission made, after hours on April 28, by the subject utility in the above-referenced docket. We are also in receipt of the motion of the Department of Energy seeking dismissal, without prejudice, of the rate case filing pending the submission by the subject utility of its FERC Form 1 for 2022.

Please be advised that the OCA joins in the Department’s motion and agrees fully with the concerns expressed by the Department in its pleading. As noted by the Department, the FERC Form 1 about to be filed by the subject utility is foundational – it will contain detailed information about expenses, revenues, assets, and liabilities for calendar year 2022, which also serves as the test year for the rate case. Ordinarily, the utility’s Form 1 would have been submitted on April 18, but the subject utility obtained an extension from the federal agency to May 31, 2023.

A rate case such as this one operates on a statutorily imposed one-year schedule. *See* RSA 378:6, I(a) (providing for a maximum rate schedule suspension period of 12 months). We stress that depriving the Department of a month of time for reconciling the rate case documents to the figures reported on Form 1 affects not just the Department but also the OCA and, ultimately, the Commission. In particular, we lack the resources to duplicate the efforts undertaken by the Department’s audit team and depend on its findings.

For the foregoing reasons, the OCA respectfully requests that the Commission grant the Department’s motion to dismiss the pending rate case without prejudice.

Sincerely,

A handwritten signature in blue ink, appearing to read "DKreis".

Donald M. Kreis  
Consumer Advocate

Cc: Service List, via e-mail