

# KEEGAN WERLIN LLP

ATTORNEYS AT LAW

99 HIGH STREET, Suite 2900

BOSTON, MASSACHUSETTS 02110

---

(617) 951-1400

TELECOPIER:

(617) 951- 1354

September 11, 2023

Daniel C. Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, New Hampshire 03301

**Re: Docket No. DE 23-039  
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty  
Request for Change in Distribution Rates  
Response to Department of Energy Motion to Compel**

Dear Chairman Goldner:

On August 31, 2023, the New Hampshire Department of Energy filed a Motion to Compel Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (the “Company”) to Respond to Data Requests DOE 4-14 and DOE 4-16 (the “Motion”). The Motion asked the New Hampshire Public Utilities Commission (the “Commission”) to direct the Company to produce the responses to Data Requests DOE 4-14 and DOE 4-16 as soon as possible but not later than Friday, September 8, 2023 (Motion at 7).

On September 7, 2023, the New Hampshire Public Utilities Commission (the “Commission”) issued a procedural order noting that September 8, 2023 was before the Company deadline to respond to the Motion and stating that the Commission anticipated that the Company and DOE “will be able to resolve this matter, which may involve amending one or more of the deadlines for rolling discovery contained in the approved procedural schedule to afford the DOE opportunities for further discovery based on Liberty’s late-filed responses, without the Commission’s further involvement.” Order at 2. Although not required, the Company writes to confirm that the responses to Data Requests DOE 4-14 and DOE 4-16 were submitted on Friday, September 8.

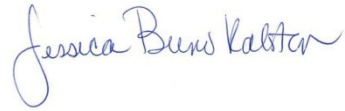
Following submission of the responses to DOE 4-14 and DOE 4-16, the Company contacted counsel for DOE to determine whether further adjustments to the procedural schedule are necessary to ensure that DOE has an opportunity to ask follow-up questions through discovery or at an additional technical session. The Company will continue to work with DOE to facilitate any necessary adjustments to the procedural schedule.

Letter to Chairman Goldner  
DE 23-039  
September 11, 2023  
Page 2 of 2

Please contact me if you have any questions.

Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Jessica Buno Ralston". The signature is written in a cursive style with a large initial 'J'.

Jessica Buno Ralston

cc: Service List, Docket DE 23-039