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April 22, 2024

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
PricewaterhouseCoopers Scope of Work

Dear Chairman Goldner:

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty (the “Company”) files this letter in response to the April 19, 2024 letter submitted to the New Hampshire Public Utilities Commission (the “Commission”) by the Department of Energy (“DOE”) and in further support of the work completed by PricewaterhouseCoopers (“PwC”). The Company provided PwC’s expert consulting report with its April 15, 2024 submission to the Commission; the Company’s April 15, 2024 filing also provided PwC’s engagement letter setting forth the scope of work that resulted in the report consistent with the Commission’s April 2, 2024 Procedural Order.

DOE notes that the PwC report provided to the Commission does not bear any letterhead. This is consistent with the engagement letter between the Company and PwC which states at page 3 that the report will not be a “PwC Branded Deliverable/Report.”¹ This is because the Code of Conduct of the American Institute of Certified Public Accountants (“AICPA”) only would allow the author of the report, Sean Riley, a partner at PwC, to provide testimony before the Commission if the report was submitted under his name, as opposed to the name of his employer. The lack of PwC branding on the report does not denigrate Mr. Riley’s work in any respect, or the report’s conclusions.

Finally, the Company reiterates that DOE’s recommendations are largely unrelated to the scope of PwC’s work. Rather, DOE has requested that the Company conduct a new revenue requirement based on a different test year, that PwC be engaged to conduct an audit under the auspices of AICPA AU-C Section 200.04, and that PwC conduct a “management” and “IT” audit. The Company proposed and did retain PwC to respond to the DOE’s pending Motion to Dismiss filed in this proceeding on December 13, 2023. The DOE supported its Motion to Dismiss based on an assertion that “the 2022 (test year) financial information (revenues, expenses, and plant in

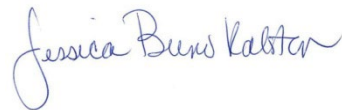
¹ The engagement letter between PwC and Liberty was provided to the Commission on April 15, 2024.

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service) on which the rate filing is based cannot be reasonably relied on and therefore Liberty has not met and cannot meet its burden to prove that its proposed rates are just and reasonable.” Motion to Dismiss at 1. The scope of work to be performed by PwC, as approved by the Commission, is designed to address this specific issue (i.e., the reliability of the Company’s 2022 financial information) without unduly delaying this proceeding. Order No. 26,952 at 5-6 (Feb. 22, 2024). DOE’s proposed scope of work that is restated in its April 19, 2024 letter seeks to both change the *type* of report to be provided by PwC (an audit report versus an expert consulting report) and to expand the objective of PwC’s work to include a management audit and an information technology (“IT”) audit. Adoption of these recommendations is not necessary to reach a determination regarding the reliability of the Company’s 2022 financial information and would require a significant extension of the procedural schedule.

Accordingly, the Company continues to request that its proposed scope of work and the resulting report be accepted for review by the Commission to inform the Commission’s determination on the Motion to Dismiss.

Very truly yours,



Jessica Buno Ralston

cc: Service List, DE 23-039