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May 5, 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 23-039; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Request for Change in Distribution Rates**

Dear Chairman Goldner:

In Order No. 26,814 (May 2, 2023), the Commission rejected the Company's May 1 rate case filing as incomplete because the Company had not yet filed its 2022 FERC Form 1. The Order recognized that the company could re-file the rate case in this docket pursuant to Puc 1604.05.

The Company has this date filed its 2022 FERC Form 1 with the FERC, the Commission, the Department of Energy, and the Office of the Consumer Advocate. See Puc 305.10 and Puc 305.11.

Therefore, on behalf of Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, and as permitted by Order No. 26,814, attached please find the following documents, which comprise the Company's rate case filing in this docket:

- A Petition for Permanent and Temporary Rates;
- A Motion for Confidential Treatment;
- The pre-filed testimony of Company witnesses and other information required by the N.H. Code of Admin. Rules Puc 1600 as follows:
 - Volume I (both a public and a confidential version):
 - Puc 1604.01(a) filing requirements for EnergyNorth.
 - Volume II:
 - The testimony and attachments of Kristin Jardin, Daniel Dane, and Gregg Therrien in support of the Company's request for temporary rates; and

- The testimony of Neil Proudman, Liberty's President, and the testimonies of other witnesses in support of the request for permanent rates and other matters; and
- Volume III:
 - Proposed Tariff NHPUC No. 22, in both redlined and clean versions, reflecting Liberty's request for an increase in permanent rates and other changes.

In this filing, the Company requests, first, changes to the Company's permanent rates that are intended to yield an increase of \$15.5 million in annual operating revenues to be effective July 1, 2023. To provide time to review the Company's request, the Company also requests a temporary increase in distribution rates of \$6.7 million to be effective July 1, 2023.

Second, the Company requests approval of a three-year forward-looking multi-year rate plan for the rate years ending June 30, 2024, June 30, 2025, and June 30, 2026.

Third, the Company requests a waiver of the requirement to file proposed clean and redlined versions of the tariff pages showing the proposed temporary rates due to the timing of the filing. Redlined tariff pages filed now will be obsolete in the coming weeks as the Company implements a number of recently approved rate changes.

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 temporary rates vary from existing rates will no longer be accurate or helpful given the upcoming rate changes in other dockets.

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 in advance of the hearing on temporary rates, likely to be held in June. Those redlined tariff pages would clearly show the impact of the proposed temporary rates.

Finally, please add the following to the service list in this docket:

Tyler Culbertson Tyler.Culbertson@libertyutilities.com

James King James.King@libertyutilities.com

Chris Wall chris.wall@brattle.com

Toby Bishop Toby.Bishop@brattle.com

Daniel Goldner, Chair

May 5, 2023

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of the above documents will be filed. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Attachments

Cc: Service List