

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty

DG 23-067  
Distribution Service Rate Case

New Hampshire Public Utilities Commission Record Request

Date Request Received: 3/6/24  
Request No: RR 1-1

Date of Response: 3/8/24  
Respondent: Erin O'Brien  
Peter Dawes

---

**REQUEST:**

Please provide the current scope of work to be performed by Pricewaterhouse Cooper (“PwC”) as proposed in the Company’s February 5, 2024 Motion to Stay Proceeding. Please also provide any correspondence regarding this scope of work between the Company and PwC.

Provide additional detail regarding the standards that apply to the work to be performed by PwC, including an explanation of whether these standards were developed by PwC, are industry-wide standards, etc.

**RESPONSE:**

The Company and PricewaterhouseCoopers (“PwC”) have a draft scope of work which is set forth below:

PwC will review and analyze information and documentation provided by Liberty, including:

- Liberty’s filing in Docket DG 23-067 to gain an understanding of the various adjustments included in the rate proceeding;
- The DOE’s Audit Report on the Liberty Rate Proceeding,
- Liberty’s policies, procedures and related controls for regulatory filings, including Liberty’s reconciliation process, and
- Liberty’s controls and reconciliation procedures for assessing the accuracy / completeness of the data conversion to Liberty’s new Enterprise Resource Planning system in Q4 2022.

PwC will conduct interviews and/or process walk-throughs with relevant Liberty stakeholders, as necessary, to obtain information about the procedures performed by the Company.

PwC will review the 2022 F-16 and the 2022 adjusted test year that formed the basis of the revenue requirement, including known and measurable adjustments to the test year.

PwC will perform a root cause analysis to gain an understanding of, where possible, the potential causes of the identified potential gaps/variances, and the magnitude and nature of the adjustments. This root cause analysis is not a full IT audit but will address the system issues referenced by the Department of Energy.

The Company will provide the engagement letter once executed consistent with the Commission's directives at the March 6, 2024 hearing. The culmination of this work will be an expert consulting report. The expert consulting report will include the scope and approach of the work performed by PwC. It will also include PwC's findings, observations, assumptions and limitations related to the procedures performed and conclusions on whether the Company's basis for asserting such data is reliable is accurate.

Please refer to Attachment 23-067 RR-1-1 for copies of correspondence between the Company and PwC regarding PwC's scope of work.<sup>1</sup>

Please refer to Attachment 23-067 RR-1-2 for a detailed explanation of the guidelines that will govern PwC's work. Attachment 23-067 RR-1-2 also explains the differences between an expert consulting report and audit report.

---

<sup>1</sup> The Company indicated at the March 6, 2024 hearing in this matter that correspondence with PwC may be subject to attorney-client privilege. After further review, the Company determined that the correspondence with PwC could be provided to the Commission. The Company notes that it has redacted pricing information in Attachment RR-1-1; this pricing information represents confidential negotiated pricing terms. The Company has already agreed that it will not seek recovery of these costs and therefore has not provided a confidential version of the attachment.