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July 27, 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. DG 23-067; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty
Request for Change in Distribution Rates**

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty, 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;
- A copy of the "proposed statement to be transmitted to the utility's customers pursuant to Puc 1203.02(c) and (d)" as required by Puc 1604.02(a)(5);
- 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 C. Drew Cayton and Tyler J. Culbertson in support of the Company's request for temporary rates; and
 - The testimony of Neil Proudman, Liberty's President, and the testimonies and attachments of other witnesses in support of the request for permanent rates and other matters; and
 - Volume III:

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- Proposed Tariff NHPUC No. 12, 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 changes to the Company's permanent rates that are intended to yield an increase of \$27,549,837 million in annual operating revenues to be effective October 1, 2023. To provide time to review the Company's request, the Company requests a temporary increase in distribution rates of \$15,287,114 to be effective October 1, 2023.

The Company also requests approval of three step adjustments to recover non-growth capital investments put into service during calendar years 2023, 2024, and 2025.

Finally, 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 September. Those redlined tariff pages would clearly show the impact of the proposed temporary rates.

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

Sincerely,



Michael J. Sheehan

Attachments

Cc: Service List