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February 5, 2024

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

Re: Docket No. DG 23-067  
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Request for  
Change in Distribution Rates  
Motion for Stay of Proceeding

Dear Chairman Goldner:

Enclosed for filing with the New Hampshire Public Utilities Commission (the “Commission”) on behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty (the “Company”) is a Motion to Stay Proceeding in the above-referenced case. The enclosed Motion is being filed to request a brief stay of this proceeding to allow the Company to submit a third-party expert consulting report. As set forth in the enclosed motion, the Company has met with the Department of Energy (“DOE”); DOE has not taken a position regarding the Motion but has indicated that it will review the Company’s motion and respond accordingly.

The proposal to submit a third-party expert consulting report is consistent with the proposal being made by the Company’s electric affiliate (Granite State Electric) in Docket DE 23-039. The Department of Energy (“DOE”) has filed a motion to dismiss Granite State Electric’s petition in Docket DE 23-039; DOE’s motion in that proceeding remains pending before the Commission following two days of hearings.

The Company’s affiliate has proposed submission of a third-party expert consulting report in Docket DE 23-039 to assist the Commission’s review in that proceeding and to address the issues raised by the DOE in its motion to dismiss. The Company has determined that submission of an expert consulting report in this proceeding could similarly assist the Commission’s review in this proceeding. The Company is filing its Motion to Stay the Proceeding in an effort to proactively address issues raised by DOE in Docket DE 23-039 prior to the deadline for DOE and the Office of the Consumer Advocate (“OCA”) to file testimony in this proceeding.<sup>1</sup>

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<sup>1</sup> Due to the timing of DOE’s motion to dismiss in Docket DE 23-039, parties were required to file initial testimony which may become moot pending the outcome of the motion to dismiss. Granting a stay of this proceeding prior to the testimony deadline could narrow the issues raised in such testimony.

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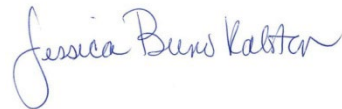
The Company has engaged PwC, at the Company's expense, to provide an independent confirmation to the Commission regarding the reliability of the data relied on in support of this proceeding. PwC has confirmed that it has significant experience working in the SAP environment. Sean Riley, a Partner at PwC will lead the engagement; Mr. Riley has significant utility regulatory experience, which is reflected in his attached resume. Mr. Riley will produce a report that will be available to address any questions from the Commission as needed.<sup>2</sup>

PwC's work will be complete by April 1, 2024<sup>3</sup> and the Company will submit PwC's report to the Commission on April 5, 2024 for the Commission's review. Accordingly, the Company respectfully requests that the Commission stay this case until such time so that it can review PwC's report and encloses a motion to stay the proceeding until April 12, 2024. The Company agrees to hold customers harmless of any reconciliation of temporary rates to permanent rates during the period during which the case is stayed.

The Company believes that the PwC report will provide confirmation to the Commission that this case can proceed with the remainder of the procedural schedule (i.e., DOE and OCA testimony, rebuttal testimony, settlement discussions, evidentiary hearings) to determine a reasonable rate adjustment.

The Company greatly appreciates the Commission's consideration of this request and would be glad to provide any further information that would be helpful.

Very truly yours,



Jessica Buno Ralston

cc: Service List, DG 23-067

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<sup>2</sup> PwC has been engaged to provide an "expert consulting report" because an expert consulting report (unlike an audit report) allows PwC to provide testimony directly to the Commission regarding such report.

<sup>3</sup> PwC has committed to completing its review of Granite State Electric first due to the pending motion to dismiss in Docket DE 23-039.