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August 21, 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-XXX; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty  
Winter 2023–2024 and Summer 2024 Cost of Gas and LDAC filing**

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty, and consistent with the guidelines and schedule developed in Docket No. DG 23-027, enclosed for filing are a redacted public version and a confidential version of the Company's Local Distribution Adjustment Charge filing, which begins Liberty's Winter 2023–2024 and Summer 2024 Cost of Gas proceeding. This filing includes the Direct Testimony of Tyler J Culbertson and Adam R.M. Yusuf, with attachments, and the Direct Testimony of Luke Sanborn, with attachments. The confidential material consists of pricing and other information that is presumed confidential pursuant Puc 201.06(a)(11).

Consistent with the schedule developed in DG 23-027, the Company proposes the following procedural schedule for both the LDAC and COG components of this docket:

- 8/21 Initial LDAC filing
- 9/1 Initial COG filing
- 9/8 LDAC discovery Set 1 and COG discovery Set 1 to Company
- 9/15 Responses to COG discovery Set 1
- 9/19 COG Technical session, 1:00 p.m. to 4:00 p.m.
- 9/20 Responses to LDAC discovery Set 1
- 9/22 Updated LDAC filing to incorporate 2/1/24 effective date
- 9/25 COG Discovery Set 2

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10/3	Responses to COG discovery Set 2
10/11	COG tech session, 1:00 to 4:00 p.m.
10/12	COG exhibits and witness list due
10/13	LDAC tech session, 9:00 a.m. to 2:00 p.m.
10/19	COG hearing (date reserved by the Commission in Order No. 26,872 (Aug. 14, 2023))
10/30	LDAC discovery Set 2
11/9	Responses to LDAC discovery Set 2
11/14	Status conference with Commission, if ordered
11/17	LDAC tech session, 9:00 a.m. to 2:00 p.m.
12/5	DOE/OCA/Intervenor testimony/technical statement <sup>1</sup>
12/15	Company rebuttal
12/18	LDAC discovery, Set 3
12/28	Responses to LDAC discovery Set 3
1/11/24	Exhibits/Witness list due
1/17/24	LDAC Hearing

Note that the filing that accompanies this letter contains all the required information on the costs and revenues for the various components of the LDAC for each component's rate year, but the filing does not calculate the reconciliations for those components as of February 1, 2024, as the Commission recently approved in Order No. 26,872 (Aug. 14, 2023). The Company did not expect approval of the new effective date to occur before making this initial filing and did not have sufficient time to prepare the revised reconciliations. As noted above, the Company will make an updated LDAC filing to calculate the reconciliations for a 2/1/24 effective date by September 5, 2023.

The Company also seeks a waiver of the requirement to file illustrative changes to tariff pages 87–89. These pages include the Company's firm distribution rates, which are not addressed in this docket but will likely change between now and when the proposed LDAC rates go into effect based on activity in other dockets.

The Company also requests a waiver of the requirement to file clean and redlined versions of tariff pages 87–89. These pages, the "Firm Rate Schedules," include the Company's distribution rates which are not addressed in this docket and will likely change between now and when the proposed LDAC rates go into effect based on activity in other dockets.

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<sup>1</sup> Although not addressed in the schedule proposed by the parties in DG 23-027, Liberty reserves the right to ask discovery questions on the DOE/OCA/Intervenor testimony/technical statements.

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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 illustrative tariff pages 87–89 filed now will not be accurate given the changes that will occur between now and the close of this docket.

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 redlined versions of the other tariff pages that contain the LDAC charges, which clearly show the impact of this docket. And, of course, the Company will file clean and redlined versions of all affected tariff pages following the order in this docket.

Last, please include the following on the service list in this matter:

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Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided. Thank you.

Sincerely,



Michael J. Sheehan

Enclosures

Cc: Donald M. Kreis, Consumer Advocate  
OCA Litigation  
Mary Schwarzer, Esq.  
Energy Litigation