



Michael J. Sheehan, Esq.
Director, Legal Services
Phone: 603-724-2135
Michael.Sheehan@libertyutilities.com

April 12, 2024

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 24-051; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Petition for Approval of Retail Rate Adjustments and Property Tax Adjustment**

Dear Chairman Goldner:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, enclosed please find Liberty's second revised Annual Retail Rate filing, which includes a Petition for Approval of Retail Rate Adjustments and Property Tax Adjustment, the pre-filed direct testimony and schedules of Christopher Green, and the second revised pre-filed direct testimony and attachments of Robert Garcia and Adam Yusuf. The pre-filed direct testimony and schedules of Christopher Green are unchanged since the Company's initial filing, but have been included for convenience.

The Company's updated filing includes corrections to the Property Tax Adjustment Mechanism, including revisions to the base rate calculations discovered during the Company's Technical Session with the Department of Energy. The transmission rates are impacted by these changes and are revised on Attachments 1 - Summary and Attachment 6- Customer Bill Impact due to these revisions.

The Company also repeats its request for a waiver of the requirement to file clean and redlined versions of the proposed tariff pages due to the timing of this and other filings that will overlap. The Company will file updated clean and redlined versions of the updated tariff pages with the tariff compliance filing. The Commission granted the Company's initial request for this waiver.

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 rate changes vary from existing rates may not be accurate given the proposed changes to the same tariff pages in the Vegetation Management Program docket that will be filed shortly [*Any others?]. Absent a waiver, redlined changes to the current tariff will not reflect changes in the VMP docket and thus will not show the cumulative changes that will go into effect at the same time.

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

Chairman Daniel Goldner
April 12, 2024

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 following the Commission's determination on this and the other pending docket. Those redlined tariff pages would clearly show the impact of this docket. The Company offers to file such pages within 5 days of the latter of an order in this docket and approval of the pending tariff pages.

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

Sincerely,

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

Michael J. Sheehan

Enclosures

Cc: Office of the Consumer Advocate
N. H. Department of Energy