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November 21, 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. DG 24-100; Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty
Keene Division Winter 2024-2025 Cost of Gas**

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty, I write to notify the Commission of an apparent omission from its two orders approving the Keene Division 2024-2025 Cost of Gas rate and respectfully request a clarification that the Company has the usual authority to adjust rates through the monthly "trigger" filings.

Order No. Order 27,070 (Oct. 31, 2024) approved the Company's proposed cost of gas rate on a provisional basis, pending resolution of questions the Commission raised regarding the allocation of CNG demand costs over the winter and summer periods. Likely due to this open question, Order No. 27,070 did not include the usual ordering clauses that authorize the Company to adjust rates each month in response to market changes in order to minimize over- or under-collection during the winter period. Order No. 27,070 directed Liberty to address the Commission's question about the CNG demand cost allocations.

After Liberty filed a technical statement addressing the question of the CNG demand charges, the Commission issued Order No. 27,075 (Nov. 20, 2024) which stated: "After reviewing the technical statement, the Commission finds that the CNG allocation in Liberty Keene's initial petition was appropriate and consistent with the company's past practices. As this was the sole basis for finding the proposed rates provisional, the Commission now finalizes approval of Liberty Keene's 2024-2025 Winter COG rates." Order No. 27,075 at 1. Order No. 27,075 also did not include the standard authority to adjust rates, as necessary.

The Company respectfully asks the Commission to clarify that Liberty has authority to make monthly adjustments to the Keene Winter 2024-2025 cost of gas rate under the terms and conditions as in prior cost of gas orders.

Daniel Goldner, Chair
November 21, 2024

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael J. Sheehan

Cc: Service List