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October 11, 2024

New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301

Re: Docket No. DG 24-106  
Liberty Utilities (Energy North Natural Gas) Corp. d/b/a Liberty  
Winter 2024-2025 and Summer 2025 Cost of Gas

To the Commission:

As you know, on September 3, 2024, Liberty filed its Winter 2024-2025 and Summer 2025 Cost of Gas filing. In its filing, Liberty seeks Commission-approval of Liberty's updated firm sales Cost of Gas rates for the 2024-2025 Winter Period and 2025 Summer Period. Additionally, Liberty seeks approval to modify the letter informing customers of the Fixed Price Option for use next year (2025/2026).

In response, the OCA's Director of Economics and Finance, Dr. Vatter, has prepared the enclosed technical statement. The recommendations within include addressing a change to the fixed price adder for the Winter 2024-2025 period, how to improve upon the process regarding expected carrying charges for both over and under collections, and the OCA's analysis for the expected cost of gas for both Winter and Summer periods.

While not addressed in this technical statement, the OCA notes its position that Winter residential customers do not owe Liberty interest resulting from the booking error addressed in Order No. 26,898 – stating that the cost of remedying Liberty's booking error not be borne by ratepayers.

Enclosed, please find the OCA's technical statement.

Sincerely,

A handwritten signature in blue ink that reads "Michael J. Grouse, Esq." is written over a horizontal line.

Michael J. Crouse  
Office of the Consumer Advocate  
Staff Attorney

Enclosure  
cc: Service List