

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

RE: GRANITE STATE ELECTRIC COMPANY D/B/A LIBERTY UTILITIES

DOCKET NO. DE 13-063

MOTION FOR WAIVER

Granite State Electric Company d/b/a Liberty Utilities (“Liberty Utilities” or the “Company”), in accordance with Puc 201.05 and 203.07, hereby moves the New Hampshire Public Utilities Commission (the “Commission”) to waive certain rules of the New Hampshire Code of Administrative Rules in order to avoid duplication and the imposition of unreasonable burden. In support of its motion, Liberty Utilities states as follows:

1. For the reasons set forth below, Liberty Utilities seeks a waiver of the requirements of Puc 1604.01(a)(25) in certain instances. If a utility filing a proposed tariff as part of a full rate case is a subsidiary entity, Puc 1604.01(a)(25) requires the utility to submit duplicates of all items required by Puc 1604.01(a) for its parent company. In all instances, the Company’s filing in this case contains the information requested as it relates to the Company itself. However, information pertaining to the Company’s parent, Algonquin Power & Utilities Corp. is, in the instances set forth below, not relevant to the Commission’s review of the Company’s request for rate relief and therefore is unnecessarily burdensome for the Company to produce. Furthermore, providing such information would increase the size of the filing, which is already voluminous. The Company is therefore seeking a waiver of those filing requirements in Puc 1604.01(a) set forth below:

1604.01(a)(1) – Internal Financial Reports

1604.01(a)(3) – Federal Income Tax Reconciliation for the Test Year

1604.01(a)(4) – Detailed Computation of New Hampshire and Federal Income Tax Factors

1604.01(a)(7) – Cost of Service Study

1604.01(a)(8) – Construction Budget

1604.01(a)(9) – Chart of Accounts

1604.01(a)(20) – Quarterly sales volumes

1604.01(a)(21) – Description of Projected Need for External Capital

1604.01(a)(22) – Capital Budget with a Statement of Source and Use of Funds

2. Liberty Utilities' request for waiver of Puc 1604.01(a)(25), to the extent the rule is intended to require production of the information identified above, is in the public interest.

The information is not relevant to the Company's rate request and its production would result in an unnecessary use of resources for the Company, the Commission and others involved in the case.

3. The Company also seeks a waiver of the requirements of Puc 1604.01(a)(25) to the extent that it requires production of information regarding National Grid USA, the prior parent company of Granite State Electric Company. On July 3, 2012, National Grid USA sold the stock of the Company to Liberty Energy Utilities (New Hampshire) Corp., the parent of which is Algonquin Power & Utilities Corp. Given that the Company had two parents during the test year for this case, the Company has provided the information required by Puc 1604.01(a)(25) regarding Algonquin, its current parent, not of National Grid USA. The Company asserts that a waiver of the parent company filing requirements as they may apply to National Grid USA is

appropriate because information regarding the current parent, not the prior parent, is relevant to the Company's request for a rate increase. In addition, it would be unduly burdensome to produce parent company information required by Puc 1604.01(a)(25) for two parent companies.

4. For the foregoing reasons, the waivers requested above are in the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. Furthermore, compliance with the rules for which the Company seeks a waiver will be unnecessarily onerous.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

- A. Grant this Motion for Waiver; and
- B. Such other relief as is just and equitable.

Respectfully submitted,

GRANITE STATE ELECTRIC COMPANY D/B/A
LIBERTY UTILITIES

By its Attorney,

Date: March 29, 2013

By:



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Certificate of Service

I hereby certify that on March 29, 2013, a copy of this Motion for Waiver has been forwarded to the service list in this docket.



Sarah B. Knowlton