

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

Docket No. DG 18-052

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities – Keene Division

**2018 Summer Period Cost of Gas Adjustment**

**Motion for Waiver of Puc 1203.05(b)**

Liberty Utilities (EnergyNorth Natural Gas) Corp., through counsel, respectfully moves the Commission pursuant to Puc 201.05 to waive the requirements of Puc 1203.05(b) so that Liberty will have the option of implementing the proposed change in its summer cost of gas rate for the Keene Division on a bills rendered basis, if necessary.

In support of this motion, Liberty states as follows:

1. On March 21, 2018, the Company filed its proposed cost of gas rates for the Keene Division for the summer period May 1 through October 31, 2018. In this motion, Liberty requests the option of implementing the rate changes on a bills rendered basis, and thus seeks a waiver of Puc 1203.05(b), which otherwise requires bills to be based on a service rendered basis.

2. The Company seeks this waiver because, although the Keene customers have been converted from the legacy Keene-specific billing system to Liberty's central billing system, and although Liberty has tested the billing system and believes it is prepared to make the changes requested in this docket on a service rendered basis, this will be the first rate change for Keene customers using the new system and there is always the chance of technical problems. This waiver would give Liberty the option of making the change on a bills rendered basis and reduce the chance of billing delays in such a contingency.

3. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution

of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

4. Waiver of Puc 1203.05(b) will serve the public interest here because it will allow Liberty the option of implementing the rate change on a bills rendered basis in the event of technical problems arising after the recent conversion of Keene customers to EnergyNorth's billing system, which would reduce the risk of untimely bills. In addition, waiving this rule will not disrupt any matters before the Commission.

WHEREFORE, the Company respectfully requests that the Commission:

- A. Grant this waiver of Puc 1203.05(b) in the event it is needed, and;
- B. Grant such other relief as is just and reasonable.

Respectfully submitted,  
Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a  
Liberty Utilities – Keene Division  
By its Attorney,

Date: April 25, 2018

By: /s/ Michael Sheehan  
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Certificate of Service

I hereby certify that on April 25, 2018, a copy of this Motion has been forwarded to the service list in this docket.

/s/ Michael Sheehan  
Michael J. Sheehan