

June 24, 2013

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**Re: Puc 1900 Rules**

Dear Ms. Howland:

I am writing on behalf of Granite State Electric Company and EnergyNorth Natural Gas, Inc. both d/b/a Liberty Utilities to provide comments on the Commission's proposed Puc 1900 rules regarding rate case expense.

- Puc 1903.06 provides a definition of “service provider” and refers to a person or legal entity “authorized to do business in New Hampshire.” We are not clear what authority to do business in the State would be required in order to provide consulting services. Some entities that meet a certain threshold of business might register as a foreign corporation pursuant to RSA 293-A but that is not typically the case for utility consultants. If such registration were required in every instance, this may create a disincentive for consultants to work in New Hampshire.
  - Proposed Change: We recommend deleting the phrase as it appears to create a requirement that is not necessary and could be unduly restrictive.
- During the pendency of a full rate case, Puc 1905.01 requires utilities to provide updates to the Commission every 60 days on the amount of expense incurred, the total estimated for each service, as well as a description of the services rendered. This obligation is quite onerous as it would likely require at least 6 filings with the Commission during a rate case. It is not clear why this information is necessary throughout the case, particularly given that the Commission will not be taking any action on it until the conclusion of the case.
  - Proposed Change: The Company requests that the Commission limit the filing of this information to the beginning and conclusion of the case.
- Puc 1907.01(a) provides that rate case expense is not recoverable where the matter “could have been performed by utility management and staff of the utility, based on their experience and expertise.” This exclusion does not take into consideration the time availability of utility management and staff. It is conceivable that a utility could have

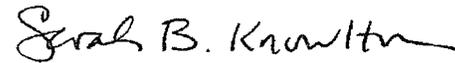


staff qualified to provide the service but could be resource constrained. This could particularly be the case with a small company or a company with only one person who is capable of performing the service (e.g. legal). In those situations, the exception is too broad.

- Proposed Change: The Company requests that this provision be revised to read “could have been performed by utility management and staff of the utility, based on their experience, expertise and availability.”

We appreciate your consideration of these comments.

Very truly yours,

A handwritten signature in black ink that reads "Sarah B. Knowlton". The signature is written in a cursive, flowing style.

Sarah B. Knowlton