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February 3, 2021

Via Electronic Mail Only

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

**Re: Docket No. DG 14-180; Liberty Utilities (EnergyNorth Natural Gas) Corp.
Notice of Intent to File Rate Schedules**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty, I write to notify the Commission and parties that the Company intends to cease filing the “occupant account” reports called for in the settlement agreement in the above docket:

J. Soft-Off Policy

The Settling Parties agree that the Company will implement its revised Soft Off policy described in Attachment 6 hereto no later than September 1, 2015. Following implementation, the Company may modify the policy set forth in Attachment 6 as it deems appropriate and will notify the other Settling Parties in advance of any such modification. The occupant account management incentive originating from a Settlement Agreement in Dockets DG 07-129 and DG 09-050 that provides for a credit or charge to the summer and winter cost of gas calculations, as determined in the Liberty’s annual summer COG filing based on occupant account usage during the prior year and compared to a predetermined benchmark will be discontinued. The Company will track and report to the Commission, within 60 days of calendar year end, the prior year’s annual volume and costs attributable to usage by Occupant Accounts (costs shall be broken down by distribution and supply), the number of existing Occupant Accounts, the arrearages for Occupant Accounts (which shall be broken down by such aging categories as are tracked by the Company) and the number of Occupant Accounts opened and closed during the year.

Paragraph II. J. of the Settlement Agreement filed May 19, 2015, at 7 (emphasis added). A copy of Attachment 6 to the Settlement Agreement, referenced above, is included with this letter.

In last year's filing, the Company advised that it did not have any occupant accounts: "Pursuant to Section II. J. of the Settlement Agreement in Docket No. DG 14-180, this is notification that Liberty Utilities no longer has Occupant accounts." February 19, 2020, letter, attached. The Company acquired no occupant accounts during 2020 and does not anticipate that it will ever again have occupant accounts.

Therefore, the Company hereby notifies the Commission and the parties that it no longer intends to file the occupant account reports.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Enclosures

Cc: Service List

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Soft Off Process: Current vs Proposed Plan
Docket No. DG 14-180
October 15, 2014 (Rev. May 11, 2015)

Executive Summary

In response to Staff's request, Liberty Utilities (EnergyNorth Natural Gas) Corp. has evaluated its "soft off" process in an effort to reduce the number of occupant accounts and corresponding unaccounted-for gas. A soft off process allows an account to be terminated and final billed following a customer request without physically terminating service to the premises. The following proposal outlines Liberty Utilities' current process, proposed plan, as well as the incremental costs of the proposed process.

A. Current Soft Off Process

The attached Table 1 outlines Liberty Utilities' current process. Today, all gas customers who request termination of their account are eligible for a soft off rather than a meter shut off.

When a customer calls Liberty Utilities to terminate an account, the Company reads the meter, renders a final bill and takes the account out of the customer's name. If a new customer calls in to take over responsibility of the account, the account is put in the new customer's name.

However, if no new customer calls in, the following steps are taken:

- Once the terminated account shows a cumulative total of over 13 ccf of gas use, an "occupant account" is created and the occupant is notified in writing to activate the account.
- If the new customer does not respond within ten days, a meter shut off order is generated and the meter is shut off. Between November 1 and March 31, no shut off notice is generated.

B. Proposed Soft Off Process

Table 1 also outlines Liberty Utilities' proposed soft off plan. Key changes to the soft off process include:

- Eligibility: This process would only apply to residential customers with outside meters and no removal of any gas appliance.
- Soft Off: For eligible customers, the meter will be left on for up to thirty days after the requested account termination.

- Shut off: If no new customer calls to take responsibility for the account within 30 days of the initial account termination call, a meter shut off order will be generated and implemented.
- Timing: Meter shut offs would occur year round and not be limited to April 1 – October 31.

For customers who are not eligible for a soft off, a service order will be generated for a meter shut off. If a new customer or landlord is immediately willing to transfer the account into their name before the service order is implemented, the service order will be cancelled.

Table 1
Liberty Utilities
Soft Off Process: Current vs Proposed Plan

Plan	Current	Proposed
Criteria: Eligible Customers	All customers	Residential customers (heating and non-heating) with: a) Outside meters b) No removal of any gas appliance
Criteria: Ineligible Customers	None	1. All commercial customers 2. Residential customers that: a) Have inside meters b) Are removing at least 1 appliance c) Indicate gas will be off for extended period d) Indicate premise will be demolished
Soft Close Process	<p>The soft close process begins with:</p> <ol style="list-style-type: none"> 1. A customer calls Customer Service to terminate account. 2. The CSR generates a move in service order 3. Order generates request for an automated meter read 4. AMR uploaded into billing system for final bill. 5. Account is taken out of customer name. 6. Once the terminated account shows over 13 ccf, we send a letter requesting that the new customer call to activate account in their name. 7. If no new customer calls in 10 days after letter sent: <ul style="list-style-type: none"> • April 1 – Oct 31: a shut off (hard close) order is generated. • Nov 1 – Mar 31: no shut off (hard close) notice is generated 	<p>For eligible customers, the soft close process begins with:</p> <ol style="list-style-type: none"> 1. A customer calls Customer Service to terminate account. 2. If there is no new customer or auto-transfer, the CSR will ask for the new customer or landlord contact information from customer moving out. CSR will attempt to make contact with new customer or landlord. 3. The CSR generates a move in (vacant) service order and a hard close service order up to 30 days out. 4. Order generates request for an automated meter read 5. AMR uploaded into billing system for final bill. 6. Account is taken out of customer name. 7. If no new customer calls within 30 days after initial call to terminate account, shut off (hard close) order will be worked.

Plan	Current	Proposed
Hard Close Process (Customer ineligible for soft close)	See above process description.	<p>For customers ineligible for soft close:</p> <ol style="list-style-type: none"> 1. A customer calls Customer Service to terminate account. 2. If there is no new customer, landlord or auto-transfer on the system, CSR will ask for new customer (if known) or landlord contact data. 3. The CSR generates a Move In Vacant Off order to read and hard close the meter. Customer's mailing address and good contact telephone number will be obtained. 4. Customer moving out will be advised that they will be responsible for providing access to the meter on the scheduled appointment date. If there is no access on the scheduled date, either by the customer or landlord, the Meter Service Representative will obtain a meter read. If no AMR read is possible, the final read will be estimated and the customer will be final billed. 5. CSR will attempt to contact new customer/landlord to see if they want account transferred into their name or if they want service off. <ol style="list-style-type: none"> a) If no, service will be turned off based upon the Move In Vacant service order. b) If yes, CSR will cancel Move In Vacant service order and issue a Move In order to transfer service into the new customer/landlord's name. c) CSR will offer Auto Transfer Program 6. The Move In order generates request for an automated meter read. AMR Uploaded into billing system for final bill. 7. Account is taken out of customer name.



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February 19, 2020

Via Electronic and US Mail

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

**Re: DG 14-180; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities
Occupant Accounts – CY 2019**

Dear Ms. Howland:

Pursuant to Section II. J. of the Settlement Agreement in Docket No. DG 14-180, this is notification that Liberty Utilities no longer has Occupant accounts.

Thank you for your attention to this matter. Please do not hesitate to call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. McNamara", enclosed within a simple oval border.

Catherine A. McNamara

Enclosure
cc: OCA Litigation

5082

Liberty Utilities (EnergyNorth Natural Gas) Corp.
Occupant Accounts
Calendar Year 2019
Consumption, Cost, Aging & Open/Close

Consumption

	2019												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Distribution	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0

Cost

	2019												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
COG	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Distribution	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
LDAC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Number of Accounts - December 31, 2019

	Aging Frequency (Days)								Total (1)
	Current	1-30	31-60	61-90	91-120	121-150	150+	Unapplied	
	0	0	0	0	0	0	0	28	28

Month	Opened	Closed	Inc/(Dec)
Jan-19	0	1	(1)
Feb-19	0	1	(1)
Mar-19	0	0	0
Apr-19	1	0	1
May-19	0	0	0
Jun-19	0	0	0
Jul-19	0	1	(1)
Aug-19	0	0	0
Sep-19	0	0	0
Oct-19	0	0	0
Nov-19	0	0	0
Dec-19	0	0	0

(1) The 28 accounts are in a credit status and are from 2016. Check requests have been made to refund these customers.

(2) The company no longer has Occupant accounts