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Debra Howland Executive Director New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, New Hampshire 03301-7319

RE: DE 15-010 Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities Petition for Approval of Revisions to Default Service Solicitation Process Proposal to Change Procurement Schedule for both The Small and Large Customer Groups (Petition)

Dear Ms. Howland:

On July 22, 2015 Liberty Utilities submitted a Petition in the above captioned docket requesting approval of the New Hampshire Public Utilities Commission (Commission) to change the procurement schedule for its energy service supply. The Petition is in response to the Commission's investigation in Docket No. IR-14-338, Review of Default Service Procurement—Processes for Electric Distribution Utilities. The OCA actively participated in Docket IR 14-338 and Docket DE 15-010. The Office of the Consumer Advocate (OCA) supports Liberty's Petition.

During recent winters, energy prices shot up significantly due to supplier concerns about energy shortages and winter supply conditions. These price spikes were particularly burdensome on residential consumers. Residential default service customers who chose not to participate in the competitive market were not expecting to experience extreme price swings. Many people struggled to pay their winter electric supply bill or had to divert money from other necessities to make up the unexpected price difference. In response, the Commission opened an investigation to see if there were options for reducing the winter price spikes.

Liberty Utilities' Petition represents a modest change to procurement practices which is projected to have a moderating effect on winter energy service prices. Liberty proposes to

change the required procurement schedule for the Small (which includes residential default service customer) and Large Customer Groups to separate the two highest priced winter months. Liberty proposes to procure power for the periods of February 1 to July 31 and August 1 to January 31. By shifting the time period over which the energy supplies are purchased, the OCA expects the extreme price fluctuations experienced in recent winters will be reduced, without unduly affecting the wholesale competitive supply market in New England.

Therefore the OCA requests the Commission approve the Petition in its entirety.

Susan W. Chamberlin Consumer Advocate

cc: Service List via electronic mail