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April 21, 2017

Via First-Class and Electronic Mail

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

NHPUC 24APR'17PM1:52

**Re: NHPUC No. 1 – Gas Delivery, Liberty Utilities – Keene Division
Change to Page 17, "Standard Heat Content Value"**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, enclosed for filing are one original and two copies of Revised Page 17 of Tariff No. 1 for the Liberty Utilities-Keene Division, titled "Standard Heat Content Value," in both clean and redlined versions, and of a supporting Technical Statement of David Simek.

In a December 9, 2016 secretarial letter rejecting a similar tariff filing as incomplete, the Commission stated that the filing came "under the purview of RSA 378:3, as it implicate[d] changes in the Company's rates, fares, charges, and prices." The Company disagrees. The attached technical statement explains why this filing does not propose any change in the Company's "rates, fares, charges, [or] prices."

The secretarial letter similarly faulted the prior filing for "not fully describ[ing] the rates and terms that will apply to customers receiving CNG service." The technical statement explains that the same "rates and terms" will apply to the CNG customers as now applies to them as propane-air customers.

Finally, the secretarial letter noted that the Company did not support the prior filing with "a supportive narrative, testimony, or technical statement." The Company has cured that defect with the attached technical statement.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Sheehan".

Michael J. Sheehan

Enclosures

cc: Donald M. Kreis, Consumer Advocate