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February 12, 2019

Via Electronic Mail and Hand-Delivery

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

NHPUC 12FEB'19 PM 2:03

RE: Docket No. DE 18-148; Complaint by Judith Thompson against Liberty Utilities

Dear Director Howland:

On behalf of Liberty Utilities (Granite State Electric) Corp. ("Liberty"), I write to provide the information requested in the Commission's January 18, 2019, secretarial letter in this matter.

First, enclosed please find an original and six copies of *Liberty's Proposed Statement of Undisputed Facts*.

Second, enclosed please find an original and six copies of *Liberty's Legal Memorandum*, which discusses the rules cited in Ms. Thompson's complaint. The Company previously filed a motion to dismiss, which contains a legal discussion of Ms. Thompson's complaints pursuant to the New Hampshire Consumer Protection Act, RSA 358-A:2, and the federal Fair Debt Collection Practices Act, 15 U.S.C. §1692.

Third, I write to disclose the following three witnesses that Liberty intends to call at the hearing and to provide the substance of their expected testimony (Liberty understands and expects that the Commission will disclose and make available a member of its consumer affairs department, if necessary):

Allison O'Neill, 15 Buttrick Road, Londonderry, NH 03053. Ms. O'Neill was the Supervisor of Collections until early August, 2018.

Jessica Allen, 15 Buttrick Road, Londonderry, NH 03053. Ms. Allen has been the Supervisor for Collections since early August 2018.

Jennifer Hemeon, 15 Buttrick Road, Londonderry, NH 03053. Ms. Hemeon has been a Collections Specialist at all times relevant to this matter.

All three witnesses will testify about their interactions with Ms. Thompson, their conversations with Ms. Thompson's doctor's office, their attempts to collect the money owed by Ms. Thompson, summaries of conversations and actions involving other Liberty employees, the rules and processes that govern Liberty's collection from medically protected accounts, other relevant rules and processes related to Ms. Thompson's complaint, how Liberty followed those processes, their communications with Commission staff, and describing and authenticating the exhibits Liberty will introduce. *Liberty's Proposed Statement of Undisputed Facts* provides details of each witness's expected testimony.

Finally, enclosed is an Exhibit List and copies of Exhibits 1 through 22. The Company asks that Exhibit 23 be reserved for a confidential document, Ms. Thompson's medical certification, which may be introduced at hearing, depending on how the case proceeds.

Sincerely,



Michael J. Sheehan

Enclosures

cc: Service List

Judith Thompson, 9 Lancelot Court, Apt. 8, Salem, NH 03079, via first-class mail

LINKED

2/13/19 JC DB