

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

RE: LIBERTY UTILITIES (ENERGYNORTH
NATURAL GAS) CORP.

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP. D/B/A LIBERTY
UTILITIES' MOTION FOR WAIVER OF PUC 506.03**

Pursuant to Puc 201.05, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty Utilities" or the "Company") hereby moves the Commission to waive the requirements of Puc 506.03 relating to peak storage requirements. In support hereof, Liberty Utilities states as follows:

1. Liberty Utilities is a natural gas distribution utility that provides natural gas on a retail basis to approximately 86,000 customers in 30 municipalities across New Hampshire. Pursuant to Puc 506.03(b), Liberty Utilities is required to maintain a propane and LNG combined inventory equal to 100% of its requirements during a 7-day cold snap (the coldest 7 consecutive days the Company has experienced on record). The Company must maintain this inventory until February 15 of each year, at which time the requirement drops to 75% of the Company's requirements for that same consecutive 7 cold day period. On March 1, the inventory requirement then drops to 50 % of the Company's requirements for that same consecutive 7 cold day period. Given the unusually high price of natural gas in the spot market, the Company is requesting a waiver of the requirements of Puc 506.03(b) between the date of this filing and March 1. Specifically, the Company is requesting to maintain its propane and LNG inventory at 50% of the 7 coldest day requirement until March 31 at which time the requirement is no longer in effect.

2. The Company seeks this waiver in order to minimize the impact of high natural gas prices on its customers. For the month of January, the Company has already had to make a spot gas purchase as high as \$91 per dekatherm of gas and spot gas has traded over \$135 per dekatherm in other Northeast locations. The prices seen in the market area this winter are unprecedented and unpredictable. By reducing the storage requirement to 50%, the Company will be able to use more of its less expensive propane, currently averaging around \$16 per dekatherm, to meet the firm requirements of its customers, in lieu of a higher percentage of and higher price for natural gas on the spot market as described above.

3. Waiver of this storage requirement is in the public interest as it will mitigate price increases that would otherwise be borne by the Company's customers. This proposed waiver will have no impact on the reliability or operation of the Company's system, and thus will have no adverse impact on customers. The waiver will not disrupt the orderly and efficient resolution of any matter currently before the Commission.

4. Staff assents to the proposed waiver.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

- A. Grant this waiver of Puc 506.03; and
- B. Grant such other and further relief as the Commission deems necessary and just.

Respectfully submitted,

LIBERTY UTILITIES (ENERGYNORTH NATURAL
GAS_ CORP. D/B/A LIBERTY UTILITIES

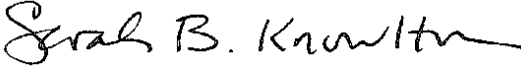
By its Attorney,

Date: January 27, 2014

By: 
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Certificate of Service

I hereby certify that on January 27, 2014, a copy of this Motion has been forwarded to the Office of Consumer Advocate.


Sarah B. Knowlton