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***Via Hand Delivery and Electronic Mail***

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

**Re: DG 14-180: Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities –Distribution Service Rate Case**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (the "Company"), I enclose the following for filing with the Commission in the above-captioned docket:

1. Pursuant to Puc 1603.03(a), an original and two copies of clean and redlined tariff pages reflecting Liberty Utilities' request for an increase in permanent rates;
2. Pursuant to Puc 203.02(a)(1), an original and six copies of a Petition for Temporary Rates and Joint Testimony of Steven E. Mullen and Howard S. Gorman regarding temporary rates, including proposed tariff pages for temporary rates;
3. Pursuant to Puc 1604.02(a), an original and six copies of the Company's permanent rate filing, containing prefiled testimony of various witnesses and other information required pursuant to N.H. Code of Admin. Rules Puc Ch. 1600;
4. Pursuant to Puc 203.02(a)(a), an original and six copies of a Motion for Protective Order and Confidential Treatment Regarding Compensation Information; and
5. Pursuant to Puc 1203.02(c), an original and six copies of the form of notice to customers which will be included in customer bills within 30 days of this filing.

I am also enclosing a separate envelope containing seven copies of confidential compensation information required to be filed pursuant to Puc 1604.01(a)(14). This information is simultaneously being filed in redacted form with the rest of the Company's permanent rate case materials.

The Company is filing this case because, under the rates currently in effect, it is unable to earn the rate of return authorized by the Commission in its Order No. 25.202 in Docket DG 10-

017. In particular, for the test year ended March 31, 2014, the Company's overall earned rate of return was 4.49% versus the 7.31% overall authorized return.

As set forth in the enclosed filing, the Company is seeking a permanent increase of \$13,442,972 in annual distribution revenue which would result in an annual increase in total bills for a residential heating customer (Rate R-3) using 797 therms per year of \$109.78 or an 8.04% increase. The primary driver of the need for a rate increase relates to capital investments made by the Company since the last rate case. A large portion of those investments were for infrastructure replacement and, by their nature, did not produce additional revenue.

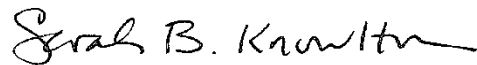
In addition, the Company seeks a step increase to recover an annual revenue deficiency of \$2,649,554 based on additional capital spending of \$16,660,624 for the twelve-month period ending March 31, 2015. The step increase would result in an annual increase in total bills for a residential heating customer using 797 therms per year of \$21.64 or a 1.58%. The primary driver of the need for the step increase is to recover information technology (IT) capital costs associated with the creation of the Company's own IT systems.

The Company's temporary rate filing seeks an increase of \$8,379,060 in annual revenues, which would result in an annual increase in total bills for a residential heating customer (Rate R-3) using 797 therms per year of \$64.28, or 5.16%. The Company is requesting that temporary rates take effect on a service rendered basis on and after September 1, 2014.

The Company requests that the Commission schedule a prehearing conference and hearing on temporary rates at the earliest date the Commission can reasonably accommodate in order to mitigate this significant erosion in the Company's financial performance.

Thank you for your assistance with this matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,



Sarah B. Knowlton

Enclosures  
cc: Service list