

THE STATE OF NEW HAMPSHIRE

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PUBLIC UTILITIES COMMISSION

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August 21, 2014

Sarah B. Knowlton
Assistant General Counsel
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053

Re: DG 14-184 Liberty Utilities (EnergyNorth Natural Gas Corp.) d/b/a
Liberty Utilities Request for Waiver of Puc 1203.11(i)

Dear Ms. Knowlton:

On July 7, 2014, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (Liberty) filed a Motion for Waiver of Puc 1203.11(i) (Waiver Request). In the Waiver Request, Liberty asked the Commission to partially waive the requirements of Puc 1203.11(i), which provides that “[u]nless special arrangements are made with the customer, a utility shall only disconnect service to its residential customers from 8:00 a.m. to 3:30 p.m. Monday through Thursday.” Liberty requested that the Commission grant the waiver so that it may disconnect natural gas service to its residential customers from 8:00 a.m. to 3:30 p.m. on Fridays or, in the alternative, to extend the time during which it can disconnect service to 5:00 p.m. on Monday through Thursday each week. Liberty justified this rule waiver request by noting the increase in accounts receivable it had experienced as a result of reduced collection activities following the cutover of customer service systems from National Grid to Liberty in September 2013 and during the 2013-2014 winter period.

Commission Staff filed a memorandum on July 23, 2014, in which it analyzed Liberty’s rule waiver request and made a recommendation to the Commission. Staff noted that, as a result of Liberty’s failure to have a fully functional collections process in place until June 2014, Liberty lost opportunities this past winter to reduce accounts receivable and past due accounts for both non-heating and heating accounts. Liberty’s inability to begin full collection activities until approximately ten weeks following the end of the defined winter period contributed to the continued increase in its customer accounts receivable, according to Staff. Staff concluded that, on balance, Liberty had adequately supported its Waiver Request, and Staff recommended that the Commission approve the alternative approach authorizing Liberty to perform disconnections of residential gas service until 5:00 p.m. on Monday through Thursday each week through November 14, 2014, on the condition that, for those customers who contact Liberty and make arrangements for repayment before 7:00 p.m. on the day of disconnection, Liberty must reconnect the customer’s

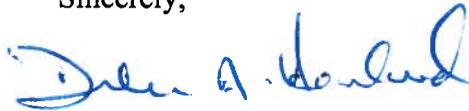
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gas service that same day. Staff indicated that the Office of Consumer Advocate had expressed support for its recommendation.

The Commission has reviewed Liberty's Waiver Request and Staff's memorandum, and has accepted Staff's recommendation. The Commission reminds Liberty that it should act prudently to pursue authorized collection and disconnection efforts, thereby avoiding excessive increases in customer accounts receivable requiring a rule waiver to perform after-hours disconnections.

Accordingly, Liberty is granted a partial waiver of Puc 1203.11(i) to perform disconnections of residential gas service until 5:00 p.m. on Monday through Thursday each week through November 14, 2014, on the condition that, for those customers who contact Liberty and make arrangements for repayment before 7:00 p.m. on the day of disconnection, Liberty shall reconnect the customer's gas service that same day.

Sincerely,



Debra A. Howland
Executive Director

cc: Service List (Electronically)
Docket File

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:
- DEBRA A HOWLAND
EXEC DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.