

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

RE: LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP. D/B/A LIBERTY
UTILITIES – KEENE DIVISION

2015 Summer Period Cost of Gas Adjustment

DOCKET NO. DG 15-117

Motion for Waiver of Puc 1203.05(b)

NOW COMES Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or the “Company”) and moves the New Hampshire Public Utilities Commission (the “Commission”) for waiver of the requirements of Puc 1203.05(b) so that it may implement the proposed change in its summer cost of gas rate for its Keene Division on a bills rendered basis. In support hereof, the Company states as follows:

1. On April 1, 2015, the Company submitted its proposed cost of gas rates for the Keene Division for the summer period, May 1 through October 31, 2015 in which it proposed a \$.628 per therm decrease from the weighted average of \$1.5402 per therm for last summer. The Company is proposing to implement the change on a bills rendered basis, and thus seeks a waiver of Puc 1203.05(b) which requires that all rate changes be implemented on a service rendered basis.

2. The Company seeks this waiver because bills to its Keene customers continue to be processed in the same manner prior to its acquisition of New Hampshire Gas Corporation, which historically has been on a bills rendered basis. As a result, customers in Keene are accustomed to rate changes on a bills rendered basis and an alteration in policy may result in customer confusion. Further, the system used to bill customers in Keene is not designed to

accommodate a change to billing on a service rendered basis; such a change would necessitate the modification or replacement of the system at a substantial cost.

3. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

4. Waiver of Puc 1203.05(b) will serve the public interest because it will allow customers to continue to be billed in the manner in which they are most familiar, and without imposing significant additional costs on the Company. In addition, waiving this rule will not disrupt any matters before the Commission as the Commission has yet to hold the merits hearing on the proposed change in the summer cost of gas rates. Given that application of the rule would be onerous both to customers and the Company, the Company respectfully requests its waiver.

5. The Commission Staff assents to the relief requested in this motion.

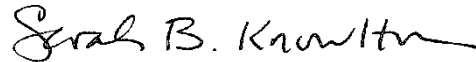
WHEREFORE, EnergyNorth respectfully requests that the Commission:

- A. Grant this waiver of Puc 1203.05(b) and;
- B. Grant such other relief as is just and reasonable and consistent with the public interest.

Respectfully submitted,

LIBERTY UTILITIES (ENERGYNORTH NATURAL
GAS) CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



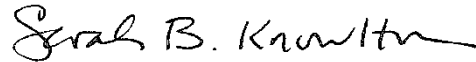
Date: April 9, 2015

By:

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Certificate of Service

I hereby certify that on April 9, 2015, a copy of this Motion has been forwarded to the service list in this docket.



Sarah B. Knowlton