

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 17-048

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES

Distribution Service Rate Case

Petition for Permanent and Temporary Rates

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (“EnergyNorth” or the “Company”), through counsel, respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) pursuant to RSA 378:27 and RSA 378:28 to fix, determine, and prescribe (1) an increase in permanent rates to be effective with service rendered on and after July 1, 2017, (2) temporary rates to be effective on and after July 1, 2017, pending the Commission’s final determination on the Company’s request for a permanent rate increase, and (3) a step increase to begin recovery of capital costs incurred through December 31, 2017, to be effective no earlier than January 1, 2018.

In support of this petition, the Company states as follows:

1. On March 28, 2017, the Company filed a Notice of Intent to File Rate Schedules pursuant to Puc 1604.05(e).
2. Contemporaneous with this *Petition for Permanent and Temporary Rates*, the Company is filing proposed revised tariff pages, with supporting testimony and schedules, requesting changes to the Company’s permanent rates that are intended to yield an annual

increase of \$13,749,361 (including \$712,403 for the Keene Division) in distribution revenues to be effective July 1, 2017; a temporary increase in distribution revenues of \$7,778,497 annually (which would not be applicable to customers in the Keene Division) to be effective July 1, 2017; and a step increase of \$6,071,562 annually (including \$151,050 for the Keene Division) to begin recovering the revenue requirement associated with capital projects completed through December 31, 2017, which step increase will be effective no earlier than January 1, 2018.

3. The Company is filing this case because, under the rates currently in effect, it is unable earn the rate of return authorized by the Commission in Docket No. DG 10-017. *See* Order No. 25,202 (Mar. 10, 2011). In particular, as set forth in the joint pre-filed testimony of David B. Simek and Daniel S. Dane in Support of Temporary Rates, EnergyNorth's overall earned rate of return was 5.17% for the test year ended December 31, 2016, versus the 7.05% overall return authorized by the Commission. This under-earning is primarily the result of the Company's significant investment in non-revenue producing capital projects that are necessary for the provision of safe and reliable service as described in the testimony of Christian Brouillard. Unless rate relief is granted, the Company will not earn a reasonable return on the cost of its property that is used and useful in the public service, resulting in a confiscation of the Company's property.

3. The Company is requesting that the Commission authorize an increase of rates on a temporary basis to generate an additional \$7,778,497 annually in distribution revenues. This proposed increase is consistent with the requirements of RSA 378:27, which provides that "temporary rates shall be sufficient to yield not less than a reasonable return on the cost of property of the utility used and useful in the public service less accrued depreciation, as shown by the reports of the utility filed with the commission." The temporary rate increase will prevent

the Company from substantially under-earning while the Commission considers the permanent rate increase. The requested temporary rates will also smooth the transition to permanent rates that the Commission may order in this docket.

4. To the extent necessary to support this request for temporary rates, the Company incorporates by reference the testimony and supporting materials filed in support of its request for permanent rate relief.

5. The proposed step increase is to recover the annual revenue requirement associated with approximately \$42 million of planned capital investment from January 1 through December 31, 2017. The Company asks that the Commission make the step increase effective at the time that permanent rates become effective following the conclusion of this proceeding, but no earlier than January 1, 2018.

6. The impact on average monthly bill amounts for the temporary, permanent, and step increases as compared to rates in effect today are shown in Attachment A to this petition.

7. The reports on file with the Commission and the supporting documents filed in this case demonstrate that the Company is entitled to the increases in rates outlined above in order to have an opportunity to earn a reasonable rate of return. RSA 378:27; RSA 378:28.

8. The rates requested by the Company in this proceeding are just and reasonable and in the public interest and should be approved by the Commission.

WHEREFORE, EnergyNorth respectfully requests that the Commission:

- A. Grant the Company's request for temporary increase of \$7,778,497 in annual distribution revenue to be effective with service rendered on and after July 1, 2017;
- B. Order such temporary rates to remain in effect until a final determination of the Company's request for a permanent rate increase;

- C. Grant the Company's request for a permanent increase of \$13,749,361 in annual distribution revenue to be effective with service rendered on and after July 1, 2017;
- D. Grant the Company's request for a step increase of \$6,071,562 in annual distribution revenue for capital investments made through December 31, 2017, to be effective with service rendered no earlier than January 1, 2018; and
- E. 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 28, 2017

By: _____
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Certificate of Service

I hereby certify that on April 28, 2017, a copy of this Petition for Permanent and Temporary Rates has been forwarded to the service list in this docket.



Michael J. Sheehan

Attachment A

	Temporary				Permanent			Permanent + Step			
	Average	increase(decrease)			increase(decrease)			increase(decrease)			
	Monthly Usage[1]	Monthly (\$)[2]	Distribution (%) [3]	Total Bill (%) [4]	Monthly (\$)[2]	Distribution (%) [3]	Total Bill (%) [4]	Monthly (\$)[2]	Distribution (%) [3]	Total Bill (%) [4]	
EnergyNorth											
R-1 - Residential Non-Heating	19	\$ 2.20	11.51%	7.21%	\$ 4.95	25.94%	16.24%	\$ 7.04	36.88%	23.09%	
R-3 - Residential Heating	63	\$ 5.02	11.51%	6.05%	\$ 9.91	22.74%	11.95%	\$ 13.76	31.57%	16.59%	
G-41 - C&I Low Annual, High Winter	173	\$ 11.77	11.51%	5.70%	\$ 16.47	16.11%	7.98%	\$ 22.86	22.30%	11.08%	
G-42 - C&I Medium Annual, High Winter	1,197	\$ 58.95	11.51%	4.81%	\$ 69.71	13.61%	5.68%	\$ 100.32	19.59%	8.18%	
G-52 - C&I Medium Annual, Low Winter	1,224	\$ 40.40	11.51%	3.75%	\$ 71.79	20.45%	6.66%	\$ 92.94	26.47%	8.62%	
Keene Division											
Residential to (EnergyNorth R-1)	14	N/A	N/A	N/A	\$ (0.80)	-6.66%	-1.92%	\$ 0.74	-0.52%	1.76%	
Residential to (EnergyNorth R-3)	43	N/A	N/A	N/A	\$ (10.53)	-22.89%	-9.07%	\$ (7.42)	-17.49%	-6.39%	
Commerical to (EnergyNorth G-41)	95	N/A	N/A	N/A	\$ (17.95)	-18.82%	-7.17%	\$ (13.93)	-15.39%	-5.56%	
Commerical to (EnergyNorth G-42)	1,361	N/A	N/A	N/A	\$ (471.04)	-45.08%	-16.06%	\$ (437.06)	-42.11%	-14.91%	
Commerical to (EnergyNorth G-52)	1,808	N/A	N/A	N/A	\$ (935.47)	-65.62%	-37.50%	\$ (906.82)	-63.71%	-36.35%	

[1] Average monthly usage is annual typical usage divided by 12

[2] Monthly (\$) increase is annual total bill increase/(decrease) divided by 12

[3] Percent of annual distribution increase/(decrease) based on monthly typical usage

[4] Percent of annual total bill increase/(decrease) based on monthly typical usage and approved COG & LDAC rates as of April 2017