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August 19, 2021

Via Electronic Mail Only

Susan Gagne, Tariff Administrator
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: DE 19-064 Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Notice of Intent to File Rate Schedules**

Dear Ms. Gagne:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, I write in response to your letter of August 18, 2021, which asked the Company to “refile the revised tariff pages per Puc 1603.03; Method of Filing, and consistent with Puc 1603.5; Revisions to Presently Effective Tariffs.” Neither rule applies here. Thus, there is no basis to request the Company to make any further filings.

Puc 1603.03, titled Method of Filing, contains the mechanical filing requirements that: (a) parties make paper filings (which is currently superseded by the March 17, 2020, secretarial letter requiring only electronic filings); (b) parties make electronic filings (which the Company has done); (c) describe those documents that may be excused from the electronic filing requirement (which is not applicable here); (d) preclude filing by facsimile (which is not applicable here); and (e) direct those who lack the capability of making electronic filings to request a waiver (which is also not applicable here).

Puc 1603.05 is also inapplicable because it governs only when a utility “proposes to revise an existing tariff.” Puc 1603.05(a). The filings at issue here are not proposing any tariff

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changes. Rather, they are implementing tariff changes that the Commission has already approved. Such "compliance filings" simply do not fall within the scope of Puc 1603.05.

The Company recognizes that the rule requiring the filing of "annotated," or redlined, versions of the tariff pages did apply to the filing of *proposed* tariff language on April 6, 2021. However, the April filing included a request for waiver of that requirement. Since the Commission did not reject the April 6, 2021, filing as deficient, and proceeded to a hearing and an order on the merits, the Commission tacitly approved the waiver request. Now that we are post-hearing and post-order, Puc 1603.05 does not apply and the Company's prior compliance filings are consistent with the rules. See the Company's letter of July 30, 2021.

Therefore, we respectfully ask that you withdraw your request for any further filings on this topic.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version will be provided.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

cc: Service List