

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Liberty Utilities (Granite State Electric) Corp.
d/b/a Liberty Utilities

Docket No. DE 19-xxx

Least Cost Integrated Resource Plan

Assented-To Motion to Waive Filing Requirements

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, through counsel, respectfully moves the Commission pursuant to Puc 201.05 for a waiver of that part of Puc 203.02(a) which requires filing of “one original and 6 paper copies of all documents with the commission” only as to the Standard Operating Procedures, Attachment 6.

In support of this motion, Liberty represents as follows:

1. Liberty is this date making its “more limited filing” as directed by Order No. 26,261 (June 14, 2019), which includes the Company’s Standard Operating Procedures (“SOP”). Order at 6. The SOP, a document that describes essentially every operational activity, is 2,083 pages long.
2. Puc 203.02, titled “Filing Requirements,” states: “for a filing to be effective in an adjudicative proceeding, a party shall: (1) File one original and 6 paper copies of all documents with the commission” Puc 203.02(a)(1).
3. Seven copies of the SOP would constitute nearly 14,000 pages, a burdensome and expensive undertaking.
4. Liberty seeks a waiver of Puc 203.02(a)(1) so that the Company is only required to file one paper copy of Attachment 6 (the Company will also file an electronic copy).

5. Puc 201.05 authorizes the Commission to waive any rule if: “(1) The waiver serves the public interest; and (2) The waiver will not disrupt the orderly and efficient resolution of matters before the commission.” Puc 201.05(a)(1) and (2). The waiver will serve the public interest if: “(1) Compliance with the rule would be onerous or inapplicable given the circumstances of the affected person; or (2) The purpose of the rule would be satisfied by an alternative method proposed.” Puc 201.05(b)(1) and (2).
6. The requested waiver will serve the public interest because compliance “would be onerous.” The requested waiver will also “not disrupt the orderly and efficient resolution of matters before the commission” because an electronic version will be available and parties can print copies of relevant sections as desired.
7. Counsel for Staff and the Consumer Advocate assent to the relief sought.

WHEREFORE, Liberty respectfully asks that the Commission:

- a. Grant the requested waiver and accept the single paper copy of Attachment 6; and
- b. Grant such other relief as is just and reasonable.

Respectfully submitted,
Liberty Utilities (Granite State Electric) Corp.
By its Attorney,



Date: July 15, 2019

By: _____
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Certificate of Service

I hereby certify that on July 15, 2019, a copy of this motion has been electronically forwarded to Commission Staff and the Office of the Consumer Advocate.



By: _____

Michael J. Sheehan