

STATE OF NEW HAMPSHIRE

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August 11, 2020

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301

Re: Docket No. DG 20-105; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities; Request for Change in Rates

Dear Ms. Howland:

On July 31, 2020, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities (Liberty) petitioned the Commission for a change in distribution rates. With that petition, Liberty filed:

- Motion for Protective Order and Confidential Treatment regarding Compensation Information
- Motion for Waiver of Puc 1605.02 Clean Copy of Tariff
- Proposed Notice to Customers
- Rate Case Filing Requirements Pursuant to Puc 1604.01(a)
- Direct Testimony David B. Simek and Kenneth A. Sosnick Temporary Rates
- Attachments D. Simek and K. Sosnick Temp Rates
- Direct Testimony Susan L. Fleck
- Direct Testimony David B. Simek and Kenneth A. Sosnick
- Attachments D. Simek and K. Sosnick
- Direct Testimony David B. Simek and Catherine A. McNamara
- Attachments D. Simek and C. McNamara
- Direct Testimony William J. Clark and Mark R. Stevens
- Attachments W. Clark and M. Stevens
- Direct Testimony Brian R. Frost, Robert A. Mostone and Heather M. Tebbetts
- Attachments B, Frost, R. Mostone and H. Tebbetts
- Direct Testimony Steven E. Mullen
- Attachments S. Mullen
- Direct Testimony Matthew J. Decourcey
- Attachments M. Decourcey
- Direct Testimony Kenneth A. Sosnick
- Attachments K. Sosnick
- Direct Testimony John Cochrane
- Attachments J. Cochrane
- Tariff NHPUC No. 11 Perm Rates

Consistent with the Secretarial Letter of March 17, 2020, in light of the COVID-19 pandemic, Liberty did not provide paper copies of this filing, as would normally be required under Puc 203.02.

The filing consists of three volumes, containing testimony and schedules of 12 witnesses, a complete redlined tariff for gas distribution service and standard PUC rate case filing requirements; in total, over 1,000 pages. If the tariff is suspended pursuant to RSA 378.6, as expected, the Commission's investigation of this case will go on until July 31, 2021. The request for increased rates is substantial, almost \$13.5 million annually, plus a step increase of almost \$5.7 million annually; more than a 22% increase in distribution revenues in total.

Given the size of the filing, the magnitude of the requested increase in terms of total dollars and percentages, and the length of time that the Staff, the Commission and the Office of the Consumer Advocate and any other intervenors will spend reviewing this request, Staff respectfully requests that the Commission require Liberty to provide paper copies as would have been required under Puc 203.02.

The March 17 Secretarial Letter did away with paper copies "until further notice" and requires the petitioner to keep paper copies, presumably for filing after the pandemic subsides. Therefore, this request should not present a hardship to Liberty. Accordingly, Staff requests that the Commission provide Liberty "further notice" that paper copies are to be provided within 5 business days of the Commission's decision on this request, as though Puc 203.02 were in full force and effect.

Thank you for your attention to this matter.

Sincerely,

Paul B. Dexter  
Staff Attorney

cc: Service List – electronically only (ironically)

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