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August 12, 2020

Via Electronic Mail Only

Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: Docket No. DG 20-xxx; Liberty Utilities (EnergyNorth Natural Gas) Corp.
Notice of Intent to File Rate Schedules**

Dear Ms. Howland:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, I write in response to Commission Staff's letter requesting, in effect, an exception to the March 17, 2020, secretarial letter (the "Secretarial Letter") which suspended all Commission rules that require paper filings. The reasons supporting Staff's request were "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's request for paper copies did not address the underlying reasons for the Secretarial Letter.

The Secretarial Letter was issued in light of the Governor's March 13, 2020, declaration of a state of emergency related to COVID-19. The reasons supporting the Governor's declaration included the need "to implement measures to mitigate the spread of COVID-19." Executive Order 2020-04. The Secretarial Letter cited the Governor's declaration and stated: "During the declared emergency, certain parties may be unable to provide, and the Commission may face challenges accepting and storing, paper copies of new filings." The Commission's July 3, 2020, acknowledgement letter in this docket reiterated the no paper requirement.

The state of emergency is still in effect, the Governor having most recently extended it through October 16, 2020. Executive Order 2020-16. The risks of COVID-19 also remain. The most recent data from the NH Department of Health and Human Services indicate 179 new COVID-19 cases in New Hampshire over the past week. The Company and all its affiliates across North America take this risk seriously and have instructed employees to work from home if possible. That Liberty directive was originally to be in place through September 7, 2020, and we received notification yesterday that the directive will remain in place at least through January 2021.

To provide the convenience of the paper copies that Staff requested will put a number of people unnecessarily at risk. An employee at a copy center will handle the copies before being turned over to a Company employee. That employee (or another) will review all the copies to make sure they are in order. Perhaps a third Company employee will deliver the copies to the Commission. These three or four people will unnecessarily be exposed to each other. The Commission employees who receive, sort, deliver, and ultimately use the copies will also be unnecessarily exposed to each other and to outside people who

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previously handled the documents. The Company acknowledges that the risk of contracting COVID-19 from these contacts is relatively low, but the risk is there and it is unnecessary and unreasonable to impose that risk on these people.

The Commission has the ability to print those portions of the filing that each employee may need (certainly all do not need a copy of the entire filing). Also, the Company has no objection if a Staff member orders his or her own copies from a printing shop and has the bill directed to Liberty (or Liberty will reimburse the Commission for such expenses). Those would be reasonable rate case expenses under the circumstances.

The Company thus objects to Staff's request for paper copies in light of the Commission's ongoing directive. The Company acknowledges that it may be required to later submit paper copies of its filing along with the numerous other filings it has electronically filed since the Commission issued its directive five months ago. However, it expects such determinations to be made after the Governor lifts the state of emergency and a time when the current public health and safety concerns due to the pandemic have subsided.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this letter will be filed. Thank you.

Sincerely,



Michael J. Sheehan

cc: Service List