

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 23-xxx

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

Petition to Modify Cost of Gas Procedures

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty, respectfully petitions the Commission, as directed in Order No. 26,765 (Jan. 25, 2023), to modify the procedures for reviewing Liberty’s filings for adjustments to the cost of gas (“COG”) and the Local Distribution Adjustment Charge (“LDAC”).

In support of this petition, Liberty states as follows:

1. Over the course of recent COG proceedings, the parties have engaged with the Commission over whether and how to modify the procedures for the review of the Company’s proposed adjustments to the COG and LDAC. These discussions arose out of several COG proceedings that included complex issues that were difficult to fully review and approve in the compressed time frames of COG proceedings.
2. Order No. 26,756 referenced these discussions and directed “Liberty to file the previously requested proposals in the form of a new petition no later than March 10, 2023. This petition shall include a brief statement of positions of the DOE and OCA, to the extent they are known.” *Id* at 3. The “previously requested proposals” were to either “keep the annual LDAC and COG adjustments together, including a proposed hearing time” or to “put the

LDAC and COG adjustments on separate tracks, including whatever tariff amendments would be necessary.” *Id.* at n. 1.

3. Liberty’s preference, and thus its request in the petition, is to adopt the second proposal, putting the LDAC and COG in separate dockets and on slightly different tracks.
4. Specifically, Liberty proposes the following:
 - COG-only filing:
 - Filing due September 1;
 - Hearing in October;
 - Order by November 1 for rates effective November 1.
 - LDAC-only filing:
 - Filing September 15;
 - Hearing in January;
 - Order by February 1 for rates effective February 1.
5. The dates above will be supplemented with deadlines for supplemental filings and discovery and dates for technical sessions. Those intermediate dates will be discussed with the parties and will be proposed for Commission approval in the Company’s cover letter with each filing.
6. The relief sought in this petition will require only modest tariff changes. The current tariff states in several LDAC sections that the Company will make a filing September 1 each year to adjust those components (which will change to September 15), that the LDAC filing will be part of the COG filing (which will change to call for a separate LDAC-only filing), that those rates will be adjusted November 1 each year (which will change to February 1),

and that the new rates will remain in effect for the period November 1 through October 31 (which will change to February 1 through January 31).

7. Liberty has discussed the substance of this petition with the Department of Energy and believes that DOE is generally supportive of the two-track approach and the dates described above. DOE indicated that it intends to file a response to this petition to formally inform the Commission of its position.
8. Liberty was not able to obtain the position of the Office of the Consumer Advocate prior to filing.

WHEREFORE, Liberty respectfully requests that the Commission:

- A. Grant this petition and approve the changes to the process for filing and reviewing COG and LDAC changes as described above;
- B. Grant such further relief as is just and equitable.

Respectfully submitted,

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a
Liberty
By its Attorney,



Date: March 10, 2023

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Certificate of Service

I hereby certify that on March 10, 2023, a copy of this petition has been electronically forwarded to the Department of Energy and the Office of the Consumer Advocate.

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

Michael J. Sheehan