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March 20, 2023

***Via Electronic Mail Only***

Daniel Goldner, Chairman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

**Re: Docket No. DG 23-XXX; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty-Keene Division  
Summer 2023 Cost of Gas**

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty-Keene Division, enclosed for filing is a redacted public version and a confidential version of Liberty's Keene Division Summer 2023 Cost of Gas, which includes the Direct Testimony of Deborah Gilbertson and James King, with attachments. The confidential material consists of pricing and other information that is presumed confidential pursuant Puc 201.06(a)(11).

Please note that this filing is the same as that filed on March 17, but with corrected confidentiality markings, the fix of a single header in Schedule L to match the Contents page, and including matching contents and summary pages in the confidential and redacted versions. There are no other changes. The Company respectfully asks that the Commission replace the March 17 filing with the attached documents in its entirety to avoid any issues with the improperly marked confidential information.

The Company respectfully requests a prehearing conference in this docket as soon as one can be scheduled.

In the Joint Report filed in a prior cost of gas docket, DG 21-132, the parties agreed to propose a procedural schedule for the Commission's review and approval. The parties were unable to reach agreement on the schedule prior to today's filing, so a proposal will be filed early next week.

Please include the following on the service list in this matter:

Chairman Daniel Goldner  
March 20, 2023

- Deborah Gilbertson [Deborah.Gilbertson@libertyutilities.com](mailto:Deborah.Gilbertson@libertyutilities.com)
- James King [James.King@libertyutilities.com](mailto:James.King@libertyutilities.com)
- Erica Menard [Erica.Menard@libertyutilities.com](mailto:Erica.Menard@libertyutilities.com)
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- Joshua Tilbury [Joshua.Tilbury@libertyutilities.com](mailto:Joshua.Tilbury@libertyutilities.com)

Finally, the Company requests a waiver of Puc 1603.05(a)(1), which states: "A utility that proposes to revise an existing tariff shall submit ... [t]he entire page on which any revision occurs." The Company notes it will make the monthly COG adjustment filing next week, which filing will render the proposed rates page in this filing obsolete.

The Commission "shall waive the provisions of any of its rules ... if the commission finds that: (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). When considering whether a waiver request serves the public interest, "the commission shall waive a rule if ... [t]he purpose of the rule would be satisfied by an alternative method proposed." Puc 201.05(b).

In ruling on a similar waiver request in another Liberty docket, the Commission approved an alternative method to comply with the rule, that Liberty file illustrative tariff pages prior to hearing that show the changes proposed in this docket as of that time as the alternative method of complying with Puc 1603.05(a)(1). Liberty thus requests leave to file illustrative tariff pages and rate schedules reflecting the proposed effective date prior to hearing.

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

Sincerely,



Michael J. Sheehan

Enclosures

Cc: Donald M. Kreis, Consumer Advocate  
Mary E. Schwarzer, Esq.  
OCA Litigation  
Energy Litigation