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November 26, 2024

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. DE 24-xxx; Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty

Change to the Energy Efficiency Portion of the Local Distribution Adjustment Charge

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp., and pursuant to Puc 1605 ("Service or Tariff Change Other Than Full Rate Case") and RSA 374-F:3, enclosed please find clean and redlined versions of Tariff Pages 1, 3, 4, 87, 88, 89, and 101, which change the Energy Efficiency portion of the Local Distribution Adjustment Charge (the "EE Rate").

RSA 374-F:3, VI-a(d)(2) directs this change, as stated below:

The energy efficiency portion of the system benefits charge and local distribution adjustment charges shall adjust annually beginning January 1, 2023, and shall be calculated using the most recently available 3-year average of the consumer price index (CPI-W) as published by the Bureau of Labor Statistics of the United States Department of Labor as determined and verified by the department of energy. Utilities subject to commission rate regulation shall submit tariff amendments altering solely the system benefits charge and local distribution adjustment charge as described, reconciled for over and under collections already occurred, as soon after the effective date of this subparagraph as possible, and every December 1 for the upcoming year thereafter.

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The attached tariff pages contain the new residential EE Rate of \$0.2021, replacing the existing EE Rate of \$0.1986, and the new Commercial and Industrial EE Rate of \$0.0897 replaces the existing rate of \$0.0874, as "determined and verified" by the Department of Energy.

The simplified process of a "service or tariff change" filing under Puc 1605 is appropriate for this minor rate change because it will not result "in a significant change to the return on the cost of the property of the utility used and useful in the provision of service." Puc 1605.01(b).

Puc 1605.02(a) requires a service or tariff change filing to include, first, a "cover letter summarizing the proposed tariff change. This cover letter summarizes the proposed tariff change.

Second, Puc 1605.02(a) requires "Annotated and clean tariff pages showing the proposed changes as required pursuant to Puc 1604." Those pages are attached.

Third, the Company must provide a "Supportive narrative, testimony or technical statement." Given the straightforward reason for the rate change (legislation) and the simple changes to the tariff, this cover letter provides the required "supportive narrative."

Finally, the rule requires "supportive schedules documenting the adjustments and supporting the calculations made in the proposal." No schedules are necessary to support the new EE Rate as it was prepared by the Department of Energy, consistent with the statute.

Having complied with RSA 374-F:3, VI-a(d)(2) and Puc 1605, Liberty respectfully asks the Commission to approve the new tariff pages or to simply allow them to go into effect by operation of law by the passage of 30 days. Puc 1603.07(a)(1).

Sincerely,

Michael J. Sheehan

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Attachments

cc: N.H. Department of Energy

Office of the Consumer Advocate