

October 28, 2016

Michael Sheehan
Liberty Utilities
15 Buttrick Road
Londonderry, NH 03053

Re: DE 16-835 Complaint Against Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities by Mr. Richard Balagur Regarding the Operation of Liberty Utilities' Underground Electric Distribution System in the City of Lebanon

Dear Mr. Sheehan:

On September 23, 2016, the Commission received the attached complaint from Richard Balagur of Balagur Associates, 20 West Park, LLC, owner of the Citizens Bank building in Lebanon, and Godfrey Road Holdings, LLC, successor to MTS Development Corp. and owner of the Whipple-Pulsifer block also in Lebanon. The complaint pertains to the operation of Liberty Utilities' electric distribution system in downtown Lebanon.

The Commission is treating this matter as a complaint pursuant to RSA 365:1 and :2, and N.H. Code Admin. Rules Puc 204, and will require Liberty Utilities to respond to the complaint on or before November 7, 2016 and provide the following information as part of its response:

1. All pertinent tariff pages in effect in 1969 (when the underground facilities in question were installed) and 2012 (when the service interruption at issue occurred);
2. All filings made by Liberty with the Second Judicial Circuit – District Division – Lebanon in response to the complaint filed with the court by 20 West Park LLC, Godfrey Road Holdings, LLC, Balagur Associates LLC and Richard Balagur on July 6, 2015;
3. Any diagrams, maps or charts in Liberty's possession showing the underground facilities in question.
4. Any diagrams, maps or charts in Liberty's possession showing what facilities the underground facilities in question are connected to.
5. Whether the underground facilities in question are currently, or have ever been, included in the rate base of Liberty Utilities and all predecessor companies.

Sincerely,

Debra A. Howland
Executive Director