

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DG 20-105**

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP. D/B/A LIBERTY**

**Petition for Permanent Rates**

**Order on Settlement Agreement and Permanent Rates**

**ORDER NO. 26,505**

**July 30, 2021**

In this order, the Commission approves a permanent rate increase for Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty, effective August 1, 2020.

**I. PROCEDURAL HISTORY**

On July 31, 2020, Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty (Liberty) filed a Petition for Permanent and Temporary Rates pursuant to RSA 378:27 and 378:28. Liberty also filed a motion for confidential treatment regarding compensation information, customer information, and contract pricing.

On July 8, 2020, the Office of the Consumer Advocate (OCA) filed a letter of participation in this docket pursuant to RSA 363:28.

In Order No. 26,395 (August 19, 2020), the Commission suspended Liberty's proposed tariffs pending further investigation pursuant to RSA 378:6, I(a). In Order No. 26,412 (September 30, 2020), the Commission set temporary rates at existing levels, approved a revenue requirement for the purposes of temporary rates of \$92,890,325 with a \$4,994,290 increase in allowed revenues accomplished by adjusting the allowed revenue per customer (RPC) amounts for each of Liberty's rate classes, effective October 1, 2020.

On November 20, 2020, Liberty filed a Motion to Amend its petition to include a request for recovery of approximately \$7.5 million in costs incurred to investigate, evaluate, and assess the Granite Bridge Liquefied Natural Gas tank and related gas pipeline (Granite Bridge project). Accompanying its filing was a motion for protective order and confidential treatment. On December 18, 2020, the Commission issued a Supplemental Order of Notice relating to Liberty's motion.

On May 24, 2021, Commission Staff, now with the Department of Energy (Energy), on behalf of the parties, filed a letter informing the Commission that a settlement in principle had been reached resolving all issues in this proceeding except for the recovery of costs associated with the Granite Bridge project, which the parties intended to litigate. On May 28, the Commission issued a secretarial letter scheduling separate hearing dates to consider the Granite Bridge project dispute and to consider a settlement agreement as to the other issues in this rate case. On June 7, Liberty filed a motion for confidential treatment for discovery responses. On June 30, Liberty filed a settlement agreement reached between the parties on permanent rates (Settlement Agreement) and attachments. On July 13, the Commission held a duly noticed hearing on the Settlement Agreement.

Liberty's petitions and related filings, other than any information for which confidential treatment is requested of or granted by the Commission, are posted on the Commission's website at <https://www.puc.nh.gov/Regulatory/Docketbk/2020/20-105.html>.

## **II. POSITIONS OF THE PARTIES**

### **A. Liberty**

Liberty's petition requested that the Commission grant: (1) a permanent increase in Liberty's distribution rates effective with service rendered on or after September 1, 2020,

designed to yield an increase of \$13,497,250 in annual revenue; (2) temporary rates effective with service rendered on or after October 1, 2020, designed to yield an increase of \$6,500,000 in annual revenue pending the Commission's final determination on the Company's request for a permanent rate increase; and (3) a step adjustment in rates designed to yield an increase of \$5,680,641 in annual revenue to recover costs associated with approximately \$38 million of capital expenditures projected to be made during 2020, to be effective no earlier than August 1, 2021. Liberty alleged that under the rates currently in effect, it is unable to earn the rate of return authorized by the Commission.

#### **B. Office of the Consumer Advocate**

On March 18, 2021, the Office of the Consumer Advocate (OCA) pre-filed the direct testimony of Pradip Chattopadhyay, Al-Azad Iqbal, and Jerome Mierzwa. The OCA's testimony recommended an ROE of 8.9 percent, did not include a recommendation for a capital structure different from the Company's proposal, and included other proposed adjustments and rate design elements.

#### **C. Department of Energy**

On March 18, 2021, Energy filed the direct testimony of Stephen Frink, Randall Woolridge, and Donna Mullinax. Energy's testimony recommended the following: (1) a return on equity of 9.0 percent and a capital structure of 49.21 percent equity and 50.79 percent long term debt; (2) a permanent decrease to revenue requirement of \$2,240,114 below the temporary rate level; (3) one step increase for capital expenditures projected to be made during 2020 of \$5,157,187, subject to audit, with no step adjustments for future years; and (5) other proposed adjustments.

### III. MOTIONS FOR PROTECTIVE ORDER

Liberty moved for orders pursuant to the New Hampshire Code of Administrative Rules, Puc 203.08, to protect portions of its filings and responses to various data requests. Liberty asserted that each of its identified responses are exempt from disclosure under RSA 91 A:5, IV, or RSA 363:38.

In its July 31, 2020 filing Liberty requested confidential treatment of bates page I-120 of its initial filing, which it stated contains employee compensation information for which there is a strong privacy interest with no corresponding public interest. In its November 20, 2020, filing Liberty requested confidential treatment of its Supplemental Testimony at bates pages 18, 20, 23-24, 26-27, and 44-45, which it stated contains confidential pricing information that, if disclosed, would impair its ability to receive competitive pricing in the future and for which there is a strong privacy interest with no corresponding public interest. In its April 29, 2021, filing Liberty requested confidential treatment of: Attachment WJC-MRS-1(c) at Bates II-607 of its rebuttal testimony, which it stated contains confidential pricing information that, if disclosed, would impair its ability to receive competitive pricing in the future; and Attachment WJC/SEM-1, which it stated contains customer information that is confidential pursuant to RSA 363:37-38. In its June 7, 2021, filing Liberty requested confidential treatment of: Confidential Attachments OCA 1-4.e.3.xlsx, Staff 1-8.xlsx, Staff 1-8.1, Staff TS 1.2.b.1, Staff TS 1-2.b.2, and Staff TSTS-1.a.xlsx, which it stated contains customer information that is confidential pursuant to RSA 363:37-38; Confidential Attachments OCA 1-35.xlsx, Staff 1-4.d.2.xlsx, Staff TS 3-8.b.1, Staff TS 3-8.b.2, Staff TS 3-8.b.3, Staff TS 3-8.b.4, Staff TS 3-8.c.xlsx, and Staff TS 2-1 under both RSA 363:38 and RSA 91-A:5 for which there is a strong privacy interest with no corresponding public interest., IV; Confidential Attachments OCA 4-9.b.i.1 through OCA 4-9.b.i.3, OCA 4-

9.b.iii.1 through OCA 4-9.b.iii.5, and Staff 4-5a through Staff 4-5l, which it stated contains confidential information of third parties that is proprietary and competitively sensitive for which there is a strong privacy interest with no corresponding public interest; Confidential Attachments Staff 2-1, t Staff 3-2.1, Staff 3-20.1.zip, Staff 3-20.2.pdf, Staff 3-22.zip<sup>1</sup>, Staff 3-23.2.zip, OCA 6-9.2, and Staff TS 3-16, which it stated contains confidential information of Liberty and its corporate affiliates for which there is a strong privacy interest with no corresponding public interest; responses to Staff 3-64, Staff 3-67, and Confidential Attachment Staff TS 3-15.xlsx, which it stated contains confidential employee information which constitutes confidential personnel information for which there is a strong privacy interest with no corresponding public interest; Confidential Attachment Staff 4-3, Staff 5-7.xlsx and its response to OCA 5-6, which it stated contains confidential pricing information that, if disclosed, would impair its ability to receive competitive pricing in the future. Aside from the withdrawn request relating to Staff 3-22.zip, no party objected to Liberty's requests.

#### **IV. SETTLEMENT AGREEMENT**

Liberty, the OCA, and Energy (Settling Parties) were signatories to the Settlement Agreement. During the hearing on the Settlement Agreement, testimony was presented by Steven Mullen, David Simek, Heather Tebbetts, Pradip Chattopadhyay, Al-Azad Iqbal, and Donna Mullinax in support of the agreement.

The Settlement Agreement provides for a permanent increase to Liberty's distribution revenue requirement in the amount of \$6,294,290, which is a \$1.3 million increase above the level approved of in the temporary rates order. Of the total increase, the Settling Parties agreed

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<sup>1</sup> At hearing on July 13, 2021, Energy objected to Liberty's request for confidential treatment of the information identified as Staff 3-22.zip, Liberty withdrew its request for confidential treatment of this information in its cover letter accompanying its responses to Record Requests on July 16, 2021.

that \$1,993,587 of the permanent increase shall be applied to the next cost of gas proceeding, along with a reconciling surcharge added to Liberty's Local Distribution Adjustment Clause. The remainder of the revenue requirement increase, \$4,394,290, would be collected through distribution rates for service rendered effective August 1, 2021, and reconciled back to the effective date of temporary rates. Because the temporary rate revenue increase was an increase of \$4,994,290, the result is that the permanent rate change shall be a decrease of approximately \$600,000 from temporary rates.

Regarding rate base, the Settlement Agreement provides for 25.72 lead/lag days in cash working capital, commitments to study cost of removal in 2021 and depreciation based on 2021 numbers which shall be reflected in the second step increase, and for treatment of Liberty's excess accumulated deferred income tax liabilities.

The Settlement Agreement provides for a return on equity of 9.3 percent and a capital structure of 52 percent equity and 48 percent long term debt. The Settlement Agreement allows Liberty two step adjustments, the first for certain capital projects placed in service during calendar year 2020, effective on August 1, 2021, and capped at a \$4.0 million increase to annual distribution revenue. The second step adjustment would be for certain capital projects placed in service during calendar year 2021, and shall be effective August 1, 2022, and capped at a \$3.2 million annual increase to distribution revenue. Additionally, the Settlement Agreement contains a provision restricting Liberty's next rate case test year to be no sooner than the twelve-month period ending December 31, 2022.

The Settlement Agreement includes a local property tax adjustment mechanism, which the settling parties assert is consistent with RSA 72:8-e. The mechanism would allow Liberty

recovery or refund of local property tax expenses that differ from the amount included in base rates, beginning with the April 1, 2020 tax year.

The Settlement Agreement contains new provisions relating to the costs associated with the Keene propane to compressed natural gas (CNG) conversion, including allowing Liberty to recover one-half of the incrementally higher CNG supply costs as compared to the propane supply cost, definitional terms relating to the Keene Phase 1 project, and a provision for cost recovery in the second step adjustment. The Settlement Agreement also contains provisions resulting in reduction to the revenue requirement relating to the continuation of the risk sharing mechanism for the Pelham Expansion project and iNATGAS CNG facility. The recovery of costs associated with the Granite Bridge project are excluded from the Settlement Agreement.

The settling parties included provisions relating to Liberty's decoupled rate structure designed to clarify the decoupling mechanism and associated tariff language. Those provisions include five key points relating to 1) revenue per customer calculations; 2) incremental revenue per customer calculations; 3) the Managed Expansion Program premium; 4) a Revenue Decoupling Adjustment on Liberty's balance sheets; and 5) the revenue per customer calculation reporting requirements. The settling parties also agreed to review regulatory reporting requirements, and discuss areas for potential elimination, consolidation, and decreased frequency of those reporting requirements.

Lastly, the Settlement agreement contains provisions relating to recoupment of rate case expenses and revenue reconciliation. Under the terms of the Settlement Agreement, Liberty is authorized to recover an estimated \$856,864.64 in rate case expenses beginning November 1, 2021 through the Local Distribution Adjustment Clause mechanism, subject to review and approval by the Commission. In reconciling temporary rates to permanent rates, Liberty shall

return an estimated \$570,933 through the Local Distribution Adjustment Clause mechanism, subject to review and approval as part of a through the Local Distribution Adjustment Clause proceeding.

## V. COMMISSION ANALYSIS

### *Settlement Agreement*

The Commission is authorized to fix rates after a hearing, upon determining that rates, fares, and charges are just and reasonable. RSA 378:7. In circumstances where a utility seeks to increase rates, the utility bears the burden of proving the necessity of the increase pursuant to RSA 378:8. In determining whether rates are just and reasonable, the Commission must balance the customers' interest in paying no higher rates than are required against the investors' interest in obtaining a reasonable return on their investment. *Eastman Sewer Company, Inc.*, 138 N.H. 221, 225 (1994). In this way, the Commission serves as arbiter between the interests of customers and those of regulated utilities. *See* RSA 363:17-a; *see also* *EnergyNorth Natural Gas, Inc. d/b/a National Grid NH*, Order No. 25,202 at 17 (March 10, 2011).

Pursuant to RSA 541-A:31, V(a), informal disposition may be made of any contested case at any time prior to the entry of a final decision or order, by stipulation, agreed settlement, consent order, or default. Puc 203.20(b) requires the Commission to determine, prior to approving disposition of a contested case by settlement, that the settlement results are just and reasonable and serve the public interest.

In general, the Commission encourages parties to attempt to reach a settlement of issues through negotiation and compromise, as it is an opportunity for creative problem solving, allows the parties to reach a result more in line with their expectations, and is often a more expedient alternative to litigation. *EnergyNorth Natural Gas, Inc. d/b/a National Grid NH*, Order No.

25,202 at 18 (March 10, 2011). Even where all parties join a settlement agreement, however, the Commission cannot approve it without independently determining that the result comports with applicable standards. *Id.* As the Settlement Agreement pertains to a rate case, the underlying standard to be applied is whether the resulting rates are just and reasonable. RSA 378:7.

We note that the Settlement Agreement purports to resolve all matters in this docket with the exception of the Granite Bridge Project, which the parties agreed to litigate separately. The Commission accepted the parties' effective bifurcation of issues through secretarial letter scheduling separate hearings on the different issues. The Commission held separate hearings related to the recovery costs of the Granite Bridge project on June 7<sup>th</sup> and 8<sup>th</sup>, 2021. In this order we consider the terms of the Settlement Agreement only; the dispute regarding recovery of costs associated with the Granite Bridge Project will be addressed in a subsequent order.

The Settlement Agreement calls for an overall permanent revenue requirement increase of \$6,294,290, which is a \$1.3 million increase above the level provided by temporary rates. The Settlement Agreement also contemplates two step adjustments. The first step adjustment is capped at \$4,000,000 for 2020 capital investments placed in service on or before December 31, 2020, and the second step adjustment is capped at \$3,200,000 for 2021 capital investments placed in service on or before December 31, 2021.

We note the Settlement Agreement contemplates a process for review and Commission approval of the second step adjustment, while no process is provided for the first step adjustment. Implicit authorization of a company's first step adjustment through a hearing on a rate case settlement agreement is not in keeping with this Commission's recent practice, and assumes approval of the settlement agreement. *See, e.g.*, filings of May 26, 2020, in Docket No. DE 19-064 (Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities concurrently

filed settlement agreement and request for first step adjustment); filings of October 9, 2020, in Docket No. DE 19-057 (Public Service Company of New Hampshire d/b/a Eversource Energy concurrently filed settlement agreement and request for first step adjustment). Additionally, we note that subsection 5.5 affords the parties to the Settlement Agreement the ability to contest the prudence of individual investments within the step *increases*. Since the Commission has not reviewed the non-growth projects placed in service in 2020 (Exhibit 49, bates page 28) in detail, we cannot determine prudence of the first step.

We compare the amounts to the revenue increase sought by Liberty (a revenue increase of \$13,497,250 plus a 2020 step adjustment of \$5,680,641 together with a request yearly step adjustments for capital expenditures placed in service in 2021 and 2022), to that originally recommended by Energy (\$2,240,114 revenue decrease below the temporary rate level with one step adjustment for \$5,157,187). From that comparison, we understand that the amount of the revenue increase in the Settlement Agreement represents a negotiated amount that the Settling Parties agreed will provide the Company the revenues necessary to provide safe and reliable service.

The Commission notes that Liberty's approved distribution revenue from the time of its acquisition of EnergyNorth in 2012 (Order No. 25,370 (May 30, 2012)) to the present has resulted in an average annual increase of 7.3%, while the customer base has grown only 1.4% per year.

The Commission notes further the Company's actual debt/equity ratio of 43.6% Long-Term Debt and 56.4% Equity, and the Settlement Agreement of 48% Long Term Debt and 52% Equity. We encourage Liberty to review its capital structure in light of a low cost-of-debt

macroeconomic environment in anticipation of future rate cases. We also note that the agreement results in a return on equity of 9.3% and return on debt of 4.42%.

Based on the evidence before us, we find the capital structure, overall rate of return, and return on equity to be reasonable, though we anticipate gradual movement toward more debt in the cost of capital moving forward. In an increased debt regime, equity would be lower and may result in a higher return on equity than currently contemplated. We also note that the return on equity we are approving is within the scope of recent equity returns approved by the Commission, a reasonable but by no means definitive indication of an appropriate return on equity. *See Bluefield Water Works & Improvement Co. v. P.S.C. of West Virginia*, 262 U.S. 679 (1923) and *F.P.C. v. Hope Natural Gas Co.*, 320 U.S. 591 (1944), *see, e.g., Public Service Company of New Hampshire d/b/a/ Eversource Energy*, Order No. 26,433 at 19 (December 15, 2020) (approving a return on equity of 9.3 percent); *Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a Liberty Utilities*, Order No. 26,122 at 43 (April 27, 2018) (approving a return on equity of 9.3 percent); *Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities*, Order No. 26,376 at 12 (June 30, 2020) (approving a return on equity of 9.1 percent).

The record before us included testimony made under oath and adopted during the hearing that was sufficient to make the required findings relating to the permanent rate increase based on the test year of 2019 proposed in the Settlement Agreement. We have reviewed the record and conclude that the Settlement Agreement balances the interests of the customers' desire to pay no higher rates than reasonably necessary and the investors' right to earn a reasonable return on their investment. *See Eastman Sewer Company, Inc.*, 138 N.H. 221, 225 (1994). Accordingly, we find the resulting increase to permanent rates to be just and reasonable as required by RSA 374:2 and RSA 378:28.

With respect to the Property Tax Adjustment Mechanism described in the Settlement Agreement, we find its terms to be consistent with the requirements of RSA 72:8-e, and find the terms relating to filing deadlines and recoupment periods contained in the Settlement Agreement to be acceptable. *See* RSA 72:8-e, II.

Although we recognize the proposed Settlement Agreement represents a global settlement of all issues in this proceeding by parties with diverse interests, and we generally agree that the settlement results are just and reasonable and serve the public interest, we approve the Settlement Agreement subject to the following conditions:

- 1) With respect to the Settlement Agreement's provision for the recovery of rate case expenses, we understand the \$856,864.64 figure provided is an estimate that is subject to our review and approval. We emphasize that the Commission's approval of rate case expenses is based on the criteria identified in Puc Ch. 1900, and contingent on our independent finding that the expenses to be recovered are just and reasonable and in the public interest. *See* Puc 1901.01(b). Our approval of the Settlement Agreement is not a finding that Liberty has met its burden to prove that its rate case expenses have met this standard.
- 2) With respect to the first step adjustment, for plant placed in service during 2020, we accept the provision allowing for and capping such an adjustment at \$4.0 million, however we reject its implementation on August 1, 2021, contemporaneously with the distribution rates approved by this order. For the reasons stated above, we direct Liberty not to collect any revenue requirement associated the first step adjustment until it files a related request with the Commission containing the same level of detail as specified in the Settlement Agreement for the second step increase and specifically

identifying which projects shall be considered for prudence determinations up to but not in excess of the \$4 million dollar cap, the Commission holds a hearing, and the Commission has found the 2020 plant additions necessary to support the revenue requirement cap to be prudently incurred, used, and useful. Upon receipt of the request, the Commission will schedule such a hearing. We direct the Company to request an effective date for the step increase no sooner than 30 days from the date the request is filed. We also condition the first step increase on the same conditions included in section 5.4 of the Settlement Agreement, including that it shall be subject to audit and reconciliation based on the results of the audit, as approved by the Commission.

*Motion for Protective Order Related to Discovery Responses*

RSA Chapter 91-A, ensures public access to information relative to the conduct and activities of government agencies or “public bodies” such as the Commission. Disclosure of records may be required unless the information is protected by statute under RSA 91-A:4 , or exempt from disclosure under RSA 91-A:5. RSA 91-A:5, IV, exempts several categories of information, including personnel practices; confidential, commercial, or financial information; and personnel files. In each instance, the party seeking protection of the information in question has the burden of showing that a privacy interest exists, and that its interest in confidentiality outweighs the public’s interest in disclosure. *Union Leader Corp. v. Town of Salem*, 173 N.H. 345, 354-355 (May 29, 2020) (citing *Prof’l Firefighters of N.H. v. Local Gov’t Ctr.*, 159 N.H. 699, 707 (2010)). The Commission’s rules require a motion for confidential treatment to include, among other things, a “[s]pecific reference to the statutory or common law support for confidentiality” and a “detailed statement of the harm that would result from disclosure.” Puc

203.08. The benefits of disclosure to the public are then weighed against the interest(s) in nondisclosure. Separately, RSA 363:37-38 states an independent statutory basis for confidential treatment of individual utility customer data that can identify, singly or in combination, specific customers.

With respect to the requests that are related to confidential information and based solely on RSA 91-A:5, IV's enumerated exemptions, we find that Liberty has identified adequate privacy interests and that disclosure is likely to cause harm to Liberty, its employees, other third parties, and/or customers. Finally, we agree that RSA 363:38 protects the identified customer data and therefore RSA 91-A:4 applies.

Next, we must consider the public interest in disclosure. This information Liberty seeks to protect is unlikely to inform the public of the Commission's regulatory activities. On balance, the public's interest in disclosure of this information is outweighed by the potential harm to Liberty, its employees, third parties, and/or customers. Therefore, we grant Liberty's motions for protective orders filed on July 31, 2020, April 29, 2021, and June 7, 2021. We defer action on Liberty's motion for protective order filed on November 20, 2020 until we issue an order on Liberty's request to recover costs associated with the Granite Bridge project. This ruling is subject to our ongoing authority, on our own motion, or on the motion of Staff, any party, or member of the public to reconsider our determination. *See* Puc 203.08(k).

The Commission reminds the parties that due to recent statutory changes the Commission may not communicate with Department of Energy Staff on pending matters. *See* RSA 12-P:5, VI and, *see generally*, RSA 363:12. As a result, the Commission may lack access to information made available for Department of Energy unless it is directly filed in the Commission's relevant open docket.

**Based upon the foregoing, it is hereby**

**ORDERED**, that the Settlement Agreement regarding permanent distribution rates based on the 2019 test year between Liberty, Energy, and the Office of the Consumer Advocate is hereby APPROVED, as set forth and conditioned herein above; and it is

**FURTHER ORDERED**, that Liberty is hereby authorized to begin recovery of the permanent increase to its distribution revenue requirement of \$6,294,290 in rates effective with service rendered on and after August 1, 2021, consistent with the terms of the Settlement Agreement and this order; and it is

**FURTHER ORDERED**, that temporary rates approved in Order No. 26,412 (September 30, 2020), are to be reconciled with permanent rates approved in this order, with such reconciliation occurring through the Local Distribution Adjustment Clause mechanism over the course of the 12 month period beginning November 1, 2021, consistent with the terms of the Settlement Agreement; and it is

**FURTHER ORDERED**, that that Liberty is authorized to recover just and reasonable rate case expenses over one year through the Local Distribution Adjustment Clause commencing on November 1, 2021, subject to audit and adjustment, as set forth herein above; and it is

**FURTHER ORDERED**, that Liberty is authorized to recover two step increases for capital expenditures placed in service in 2020 and 2021 as provided in the Settlement Agreement, subject to further review and determination by the Commission as set forth herein above and in the Settlement Agreement; and it is

**FURTHER ORDERED**, that Liberty shall file all necessary documentation and reports in support of regulatory costs as noted above, and the step increases, as required by the Settlement Agreement and the conditions of this order; and it is

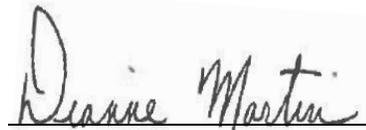
**FURTHER ORDERED**, that that the Commission will hold a hearing on Liberty's request for an increase in its step 1 revenue requirement of \$4.0 million pursuant to the terms of the Settlement Agreement and conditions of this order; and it is

**FURTHER ORDERED**, that the Property Tax Adjustment Mechanism described in the Settlement Agreement is APPROVED; and it is

**FURTHER ORDERED**, that Liberty's Motions for Protective Orders Related to Discovery Responses filed July 31, 2020, April 29, 2021, and June 7, 2021, as discussed in the body of this order, are GRANTED; and it is

**FURTHER ORDERED**, that Liberty Utilities shall file tariffs conforming to this order within 15 days of the date of this Order pursuant to N.H. Code Admin. R., Puc 1603.02(b).

By order of the Public Utilities Commission of New Hampshire this thirtieth day of July, 2021.



Dianne Martin  
Chairwoman



Daniel C. Goldner  
Commissioner

## Service List - Docket Related

Docket# : 20-105

Printed: 7/30/2021

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