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August 20, 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. DG 24-XXX; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty 2025-2026 Local Distribution Adjustment Charge ("LDAC") filing

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty, and consistent with the guidelines and schedule developed in Docket No. DG 23-027, enclosed for filing are a redacted public version and a confidential version of the Company's Local Distribution Adjustment Charge filing. This filing includes the Direct Testimony of Robert Garcia and Alyssa E. Maston, with attachments, and the Direct Testimony of Luke Sanborn, with attachments. The confidential material consists of pricing and other information that is presumed confidential pursuant Puc 201.06(a)(11).

Consistent with the schedule developed in DG 23-027, the Company proposes the following procedural schedule for this docket. Note that the Company was not able to confer with the Department of Energy and the Office of the Consumer Advocate on this schedule, but will do so and file any changes with the proposed schedule forthwith.

8/20	Initial LDAC filing
9/13	LDAC discovery Set 1 to Company
9/27	Responses to LDAC discovery Set 1
10/14	LDAC tech session, 9:00 a.m. to 2:00 p.m.
10/30	LDAC discovery Set 2
11/13	Responses to LDAC discovery Set 2
11/14	Status conference with Commission, if ordered
11/15	LDAC tech session, 9:00 a.m. to 2:00 p.m.
11/20	Updated LDAC filing

Daniel Goldner, Chairman
August 20, 2024

12/5 DOE/OCA/Intervenor testimony/technical statement¹
12/13 Company rebuttal
12/20 LDAC discovery, Set 3
1/8/25 Responses to LDAC discovery Set 3
1/14 Exhibits/Witness list due
1/21 LDAC Hearing
1/31 PUC LDAC Order
2/1 LDAC Rates effective

The Company seeks a waiver of the requirement to file illustrative changes to tariff pages 87-89. These pages include the Company's firm distribution rates, which are not addressed in this docket but will likely change between now and when the proposed LDAC rates go into effect based on activity in other dockets.

The Company also requests a waiver of the requirement to file clean and redlined versions of tariff pages 87-89. These pages, the "Firm Rate Schedules," include the Company's distribution rates which are not addressed in this docket and will likely change between now and when the proposed LDAC rates go into effect based on activity in other dockets.

Puc 1603.05(a)(1) states: "A utility that proposes to revise an existing tariff shall submit ... [t]he entire page on which any revision occurs." The Company notes that illustrative tariff pages 87 - 89 filed now will not be accurate given the changes that will occur between now and the close of this docket.

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).

The Company proposes an alternative to satisfy the intent of the rule by filing clean and redlined versions of the other tariff pages that contain the LDAC charges, which clearly show the impact of this docket. And, of course, the Company will file clean and redlined versions of all affected tariff pages following the order in this docket.

Last, please include the following on the service list in this matter:

Michelle Azulay Michelle.Azulay@libertyutilities.com
Tyler Culbertson Tyler.Culbertson@libertyutilities.com
Robert Garcia Robert.Garcia@libertyutilities.com
Erica Menard Erica.Menard@libertyutilities.com

¹ Although not addressed in the schedule proposed by the parties in DG 23-027, Liberty reserves the right to ask discovery questions on the DOE/OCA/Intervenor testimony/technical statements.

Daniel Goldner, Chairman
August 20, 2024

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

Sincerely,

A handwritten signature in black ink, appearing to read "M Sheehan", written over a faint, light-colored background.

Michael J. Sheehan

Attachments

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