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November 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 24-098; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty
2025-2026 Local Distribution Adjustment Charge ("LDAC") Updated filing**

Dear Chairman Goldner:

On behalf of Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty and in accordance with the procedural schedule approved in Docket No. DG 24-098, enclosed for filing are a redacted public version and a confidential version of the Company's Updated Local Distribution Adjustment Charge filing. This filing includes the Updated Direct Testimony of Robert Garcia and Alyssa E. Maston, with updated attachments, and the Direct Testimony of Luke Sanborn, with updated attachments. A redlined version of the Updated Direct Testimony of Robert Garcia and Alyssa E. Maston has been included with this filing. There were no further changes to the Direct Testimony of Luke Sanborn, so no redlined version has been included. Any inputs that were changed have been highlighted on the schedules. The confidential material consists of pricing and other information that is presumed confidential pursuant Puc 201.06(a)(11).

The Company also requests a waiver of the requirements in Puc 1603.05 and in the guidelines approved by Order No.26,872 (Aug. 14, 2023) in Docket No. DG 23-027 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).

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The Company proposes an alternative to satisfy the intent of the rule through its filing of 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.

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 in a cursive style.

Michael J. Sheehan

Attachments

Cc: Service List