

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty)	D.P.U. 23-__
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PETITION OF LIBERTY UTILITIES (NEW ENGLAND NATURAL GAS COMPANY) CORP. D/B/A LIBERTY FOR APPROVAL OF MID-TERM MODIFICATION

I. INTRODUCTION

Pursuant to § 3.8.2(c) of the Department of Public Utilities’ (the “Department”) Energy Efficiency Guidelines (the “Guidelines”) as approved in Investigation by the Department of Public Utilities on its own Motion into Updating its Energy Efficiency Guidelines, D.P.U. 20-150-A (2021), Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty (“Liberty” or the “Company”), respectfully requests approval from the Department of this Petition for a Mid-Term Modification (“MTM”) to the Company’s 2022-2024 Three-Year Energy Efficiency Plan (“Petition”), as approved by the Department in Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty, D.P.U. 21-123 (January 31, 2022). This MTM requests approval of additional funding across three sectors including: Residential, Income-Eligible, Commercial and Industrial (“C&I”).

In support of this Petition, the Company states the following:

1. Liberty is a gas distribution company, pursuant to G.L. c. 164, § 1, with a principal place of business at 465 Sykes Road, Fall River, Massachusetts 02720.
2. Liberty is organized under the laws of the Commonwealth of Massachusetts and is engaged in the business of selling gas at retail in Massachusetts.

3. The design, implementation, and cost recovery of the Company's energy efficiency programs are subject to the jurisdiction of the Department under the provisions of G.L. c. 164 and G.L. c. 25, §§ 19 and 21.

4. On January 31, 2022, the Department approved, in D.P.U. 21-123, Liberty's Three-Year Energy Efficiency Plan for the calendar years 2022 through 2024, which provides energy efficiency programs for the Company's gas Residential, Income-Eligible, C&I sectors.

5. In accordance with the Guidelines, the Company submits this Petition requesting approval for additional funding across three sectors including Residential, Income-Eligible, C&I sectors. The Company specifically, requests approval for additional funding for:

- (1) In the Residential Sector, the Company seeks an increase in spending of \$4,250,000 for its Residential Existing Buildings Program for the Retail, Residential Conservation Services, and Residential Coordinated Delivery core initiatives (a 39 percent increase).
- (2) In the Income Eligible Sector, the Company seeks to increase spending by \$800,000 for the Income Eligible Existing Building Program for Coordinated Delivery core initiative (a 16 percent increase).
- (3) In the C&I Sector, the Company seeks to increase spending by \$1,100,000 for the Existing Buildings Program for the New and Replacement Equipment core initiative (a 44 percent increase).

6. Pursuant to § 3.8.2(c) of Guidelines, a Program Administrator, in this case Liberty, shall submit proposed modifications at the same time to both the Energy Efficiency Advisory Council ("EEAC") for review and approval. As such, the Company will concurrently submit this petition and its attachments to the Department and the EEAC. In addition, the Company will send under separate cover the narrative description of the proposed MTM (as included in the instant filing as Exhibit LU-4).

7. In support of this Petition, Liberty has included the Pre-Filed Testimony of Kimberly Dragoo, Stephanie Terach, and Autumn R. Snyder, which describes in more detail these requests for additional funding to allow each of these programs to continue forward.

8. This Petition is consistent with G.L. c. 25, § 21(b)(1), which requires that gas distribution company Program Administrators pursue “the acquisition of all available energy efficiency and demand reduction resources,” as well as with the Department’s Guidelines for MTMs.

Accordingly, Liberty respectfully requests that the Department approve this Petition, allowing for the Company’s requests across the Residential, Income Eligible Sectors, and C&I.

Respectfully submitted,

**LIBERTY UTILITIES (NEW ENGLAND
NATURAL GAS COMPANY) CORP. D/B/A/
LIBERTY**

By its Attorneys,



Kevin F. Penders, Esq.
Michael B. Hershberg, Esq.
Keegan Werlin, LLP
99 High Street, STE 2900
Boston, MA 02110
(617) 951-1400

DATED: August 25, 2023

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated at Boston, Massachusetts this 25th day of August, 2023.



Michael B. Hershberg, Esq.
Keegan Werlin LLP
99 High Street, STE 2900
Boston, MA 02110
(617) 951-3715
mhershberg@keeganwerlin.com