



**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

June 11, 2026

Rod West  
Chief Executive Officer  
Algonquin Power  
354 Davis Road  
Oakville, Ontario, Canada L6J 2X1

Anthony Strabone  
President, Gas - New Hampshire  
Liberty Utilities  
116 North Main Street  
Concord, NH 03301

WASHINGTON, D.C. OFFICE  
223 CANNON HOB  
WASHINGTON, D.C. 20515  
PHONE: (202) 225-5206

CONCORD DISTRICT OFFICE  
18 NORTH MAIN STREET  
CONCORD, NH 03301  
PHONE: (603) 226-1002

NASHUA DISTRICT OFFICE  
184 MAIN STREET  
NASHUA, NH 03060  
PHONE: (603) 595-2006

LITTLETON DISTRICT OFFICE  
33 MAIN STREET  
LITTLETON, NH 03561  
PHONE: (603) 444-7700

Dear Mr. West and Mr. Strabone;

I am writing to express my frustration and to request more information on the nature, scope, impact, and expected remediation of Liberty Utilities' (the Company) policy to reject requests for new natural gas connections (the policy) in the Lakes Region of New Hampshire.<sup>1</sup> As you are aware, this presents an unreasonable barrier to new development efforts currently underway in the Lakes Region. The rejection of new natural gas service requests will delay projects, cause more uncertainty, and exacerbate the cost-of-living crisis that is already hurting Granite Staters. The status quo, and the Company's failure to serve its customers, are an unacceptable abdication of the Company's responsibilities as a regulated utility company.

On April 7, 2026, I convened a group of local officials, residents, planners, developers, consumer advocates, clean energy stakeholders, and a representative from Liberty Utilities in Franklin, New Hampshire, to learn more about the impact on the region, and to push for more transparency from Liberty.

I remain extremely frustrated with the lack of proactive outreach, Liberty's failure to issue guidance on the path forward, and the Company's failure to work towards an interim solution that supports ongoing development in the Lakes Region. During the meeting, Liberty's representative, Carolyn O'Connor, committed to providing answers to the questions that were asked during the discussion, but did not offer substantive answers herself.

As such, I request that your responses to the following questions be submitted, in writing, to my office, no later than 4:00 PM on June 25, 2026. Responses should be submitted as soon as they are available, rather than delaying until all answers are completed. Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.

---

<sup>1</sup> While Liberty Utilities has referred to this policy as a moratorium, the policy is more accurately described as a rejection of new natural gas connections.

**MG-001** (Obligation to Serve) Provide the Company's position on whether it has an obligation to serve natural gas customers. Include citations to any applicable legal precedent, statutes, regulations, or PUC orders.

**MG-002** (Rejection of Service) Provide the following information with respect to the Company's announcement that it will reject requests for new natural gas service connections:

- a. The nature and scope of the policy, including affected service areas.
- b. A detailed description of the process by which a determination was made that the implementation of this policy was necessary. Include the names, titles, and company affiliation of all personnel involved in the decision-making process, along with a timeline, correspondence, and documentation relating to any meetings in which a potential policy to reject new natural gas connections or other potential solutions were discussed and finalized. Correspondence and documentation should include but not be limited to: calendar invitations and attendee lists for meetings, meeting agendas, meeting minutes, and relevant memos or emails. Specifically indicate whether and discuss the degree to which parent company personnel were involved in any decision-making steps.
- c. Detailed information regarding relevant dates, including the dates on which the policy was proposed, the date on which the policy was approved by Company leadership, and the date on which the policy was made effective.
- d. Detailed information regarding where and when information regarding the policy was made publicly available, and the dates on which any such information was subsequently materially altered.
- e. A detailed explanation of Liberty's prospective plans to publicly disclose information about the policy, and to proactively notify potential and existing customers of the impacts of the policy.

**MG-003** (Impacted Customers) Provide the following information as it applies to any customers currently affected or projected to be affected by the policy:

- a. Describe the proactive outreach that Liberty conducted regarding the policy, and to what extent information about the policy has been made publicly available by Liberty.
- b. Provide copies of any materials used to notify customers about the policy and a log of the dates on which the materials were distributed.
- c. Discuss whether any municipalities or other entities were proactively notified of the policy (i.e., in advance of its imposition). If so, provide the date on which each municipality or entity was notified, the personnel title for the recipient of the notification, and a copy of the notification and any accompanying materials distributed by Liberty.
- d. Provide a log of all customer inquiries and complaints received or routed to Liberty regarding the policy. Include information regarding the status and resolution of each entry.
- e. Discuss whether customers who are required to temporarily disconnect from Liberty's natural gas service will be allowed to reconnect, and if so, what factors are taken into consideration when determining whether a customer will be able to reconnect to Liberty's natural gas service.
- f. Discuss whether customers affected by the policy are being or will be compensated in any form – big or small (e.g., reconnection fee waiver), and if so, whether the Company will commit to treating such remedies as below-the-line expenses not recoverable in rates.

- g. To date, Liberty has denied 18 requests for new connections pursuant to this policy. Confirm the completeness of this information and disclose how many requests for new connections are still pending. Discuss whether this disclosure includes customers who disconnected for any reason (e.g., nonpayment, move-in/move-out, renovation, safety issue, etc.), and if not, supplement the response to include all denials for connection in the affected service area for which the policy is cited as a justification in full or in part.
- h. Discuss the specific circumstances and justification for each of the 18 denials to date, and for any additional instance in which a request for a new natural gas service was denied under the policy.

**MG-004** (Scope and Rationale of Policy) Provide the following information regarding the service areas and customers subject to the policy:

- a. A detailed description of the methodology used to identify the specific service area and associated customers subject to the policy.
- b. Discuss whether there is a targeted number of customers, supply, and/or capacity that Liberty is trying to achieve through the application of this policy.
- c. A complete explanation regarding the justification and rationale for imposing the policy. This should include but not be limited to information regarding the Company's design day specifications, current and prior (circa 2022 IRP) sales and use forecasts, and any on-site inspection summaries, specific to the affected service area.

**MG-005** (Remedy; Timeline) Liberty Utilities' 2022/2023 Integrated Resource Plan (IRP) identifies the 12-inch 200 PSIG Concord-Tilton High Line Replacement Project (Replacement Project) as the proposed remedy to the current situation.<sup>2</sup> Regarding this project, provide the following information:

- a. Provide the date and other information associated with the initial determination by the Company that the Replacement Project would be necessary.
- b. Provide the detailed expected timeline for the Replacement Project as it exists currently. If there have been material alterations to the timeline since the Replacement Project was first identified, provide earlier iterations of the timeline as well.
- a. Discuss whether the engineering studies phase has been initiated, and if not, why not, as well as the date by which it is expected to convene.
- b. Discuss the expected duration of the engineering study and permitting phases.
- c. Discuss the ways by which the project timeline could be reduced, including by identifying primary barriers to doing so.
- d. Identify whether additional upgrades beyond the Replacement Project are necessary in order to lift the policy. If so, please detail those upgrades, including affected areas, timeline, and projected cost.

<sup>2</sup>Liberty Utilities. (2023). Integrated Resource Plan, 2022/2023 through 2026/2027.

<https://www.puc.nh.gov/VirtualFileRoom/ShowDocument.aspx?DocumentId=204d493b-99a9-4963-8208-bd9172673cc9>

- MG-006** (Interim Solutions) For any potential interim solution to address the identified issue and reverse the rejection of service policy, provide the following:
- A detailed description of any potential interim solutions identified by the Company, including those that may have been dismissed as viable alternatives.
  - For any potential solutions that the Company is not pursuing, a detailed rationale as to why.
  - A timeline and cost estimate for potentially implementing any identified solution.
  - Discuss whether Liberty considered deploying non-pipe alternatives in the affected service areas.
- MG-007** (Annual Report) Utilities operating in New Hampshire are required to file an annual report with the New Hampshire Public Utilities Commission (NH PUC) by April 1 of each calendar year. At the time of writing, Liberty's 2025 natural gas report has not been filed. With respect to this report, provide the following:
- An estimated date by which the report will be filed.
  - An explanation as to why Liberty failed to file its report in a timely manner.
  - A discussion as to whether the report will address the ongoing policy to refuse new natural gas connections and/or the February 2026 natural gas explosion in Nashua.
  - A discussion regarding Liberty Utilities' expected profits for its natural gas division in 2025, including year-over-year changes from 2024.
- MG-008** (Capital Expenditures) In 2023, Liberty indicated in its 2022/2023 Integrated Resource Plan (IRP) that it would invest \$20.8 million in pipeline upgrades for the Concord-Tilton High Line Replacement Project in 2026 and 2027.<sup>3</sup> Regarding the Replacement Project, provide the following information:
- Indicated how much of that total has been invested. For any associated capital expenditures, provide a detailed breakdown by cost, category, and date incurred.
  - Discuss whether Liberty conducted a revised cost estimate for this project since its 2022 IRP, and if so, provide all available information and supporting justification. Any revisions should be clearly delineated in terms of the underlying assumptions and cost drivers.
- MG-009** (Tariff) For the tariff relied on by the Company to deny service connections/reconnections in the affected area, provide the following:
- A copy of the specific language relied on by the Company.
  - A citation and date on which the NH PUC first, as well as most recently, authorized inclusion of this language in the applicable tariff.
  - A discussion and supporting cites to any prior reliance by the Company on the same or similar tariff language to deny service to a customer.
  - Information as to whether the NH PUC or New Hampshire courts have adjudicated a denial of service in which this tariff language was cited as the primary justification.

---

<sup>3</sup>Liberty Utilities. (2023). Integrated Resource Plan, 2022/2023 through 2026/2027.

<https://www.puc.nh.gov/VirtualFileRoom/ShowDocument.aspx?DocumentId=204d493b-99a9-4963-8208-bd9172673cc9>

**MG-010** (Hurdle Rate) Provide the Company's currently effective hurdle rate or comparable methodology, including information regarding the assumed payback period utilized to compare the revenue requirement of connecting new customers to the gas distribution system to determine the level of new business capital expenditures that will be recoverable through rates. Also, provide the citation for the NH PUC order in which this methodology was most recently approved.

**MG-011** (Lost and Unaccounted for Gas) Provide data for the last five years regarding Liberty's lost and unaccounted for gas (LAUF gas). Data should be provided on both a calendar year basis and on a summer-to-summer period (ending August 31), if available, and include a breakdown by: (a) distribution system input (sendout); (b) distribution system throughput; (c) gross unaccounted for gas (a-b) and as a percentage of sendout; (d) adjustments to gross, by category (e.g., soft closes/theft); and (e) net unaccounted for gas (a – b – d) and as a percentage of sendout. Include a discussion of how this data compares to other company affiliates and other in-state local distribution companies.

**MG-012** (Rate Case) Regarding Liberty's most recently completed rate case proceeding, provide the following information:

- a. Discuss whether any capital expenditures associated with service provided to the customers subject to the policy were proposed for inclusion in the rate base. If yes, provide a detailed summary by project as well as any applicable NH PUC determination on each request.
- b. Discuss, quantitatively and qualitatively, whether the Company's five-year capital plan was materially adjusted subsequent to the rate case final determination. If so, indicate the justification for this decision and whether this direction was provided or determined in consultation with the parent company.

**MG-013** (Materials) For customers in the Tilton service area, provide any materials distributed from 2020 to the present to customers, municipalities, or other entities (government or otherwise) regarding the expansion of the natural gas infrastructure in their area and opportunities to connect or reconnect with higher projected load. This may include but is not limited to rebates or programs customers are eligible for to encourage the use of or transition to natural gas service.

I appreciate your attention to these questions and your prompt response.

Sincerely,

Sincerely,



Maggie Goodlander  
Member of Congress