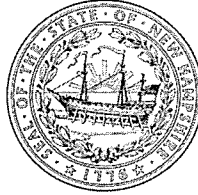


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June 6, 2014

14PUC SJUN2149:19

Sarah B. Knowlton, Esq.  
Assistant General Counsel  
Liberty Utilities  
15 Buttrick Road  
Londonderry, NH 03053

RE: DG 11-040 Liberty Utilities Network Security Assessment Scope

Dear Ms. Knowlton:

At the May 27, 2014 status conference, Liberty Utilities noted an apparent divergence of opinion between Liberty and G3, the Commission's consultant, regarding the requirements of the Settlement Agreement as related to performance of a third party network security assessment. Liberty requested the opportunity to discuss the appropriate scope for the third party security audit with Staff and G3. Staff and Liberty agreed to discuss scoping for the security assessment, and have arranged to do so on June 13, 2014.

The Settlement Agreement requires Liberty to engage a third party to assess the compliance of Liberty's network security with the ISO 27001 standards. Staff has reviewed the 14 subject areas addressed by ISO 27001, as well as the four network control statements that Liberty believes satisfy the requirements of the Settlement Agreement. Staff is not persuaded that the four network control statements selected by Liberty as the focus of the third party assessment will provide the Commission with assurance that Liberty has adopted adequate written network security policies or compliance processes.

To help further the scoping discussion scheduled for June 13, Staff requests that Liberty provide the following information: the policies and standards that Liberty employs, whether based on ISO or another source, for each of the 14 defined subject areas addressed in ISO 27001; a description of how Liberty monitors and enforces those policies and standards; and, to the extent Liberty believes that any one or more of the 14 ISO 27001 subject areas does not apply to Liberty's particular circumstances, the rationale for the inapplicability of such subject area(s).

Staff requests that Liberty provide the information specified above by the close of business on Wednesday, June 13, 2014.

Should you have any questions regarding this matter, please feel free to contact me.

14PUC

Sincerely,

A handwritten signature in black ink that reads "David K. Wiesner". The signature is written in a cursive, flowing style with a large initial 'D' and a long, sweeping underline.

David K. Wiesner, Esq.  
Staff Attorney

cc: Docket File  
Service List (electronically)

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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Docket #: 11-040-1 Printed: June 06, 2014

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- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**