



Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities

DE 16-383  
Distribution Service Rate Case

Staff Data Requests - Set 13

Date Request Received: 3/20/19  
Request No. Staff 13-1

Date of Response: 4/3/19  
Respondent: Heather Tebbetts  
Anthony Strabone

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**REQUEST:**

Reference Testimony of Tebbetts/Strabone at Bates 7 which states that the Pelham substation project came in under budget by \$445,510 or 9 %.

- a. Please reconcile the budget for the Pelham Substation of \$4,200,000 on Bates 19 and 22 of the Tebbetts/Strabone Testimony (see project 8830-C36430 on each page) with the budget for the substation in Attachment 2 of the March 15, 2017 Settlement, provided at Bates 17 of the Tebbetts/Strabone Testimony of \$3,600,000 (\$2,000,000 in 2017 (column b) and \$1,600,000 (column e) in 2018).
- b. Please reconcile the budget for the 14L4 getaway cable project of \$1,350,000 on Bates 19 and 22 of the Tebbetts/Strabone Testimony (see project 8830-C36431 on each page) with the budget for the 14L4 getaway cable project in Attachment 2 of the March 15, 2017 Settlement, provided at Bates 17 of the Tebbetts/Strabone Testimony of \$400,000 in 2017 (column b) and \$0 (column e) in 2018).

**RESPONSE:**

- a. As stated in the response to Staff 13-5, the Pelham Substation project took place over multiple years. The \$4,200,000 is the combination of the 2016 (\$600,000) and 2017 (\$3,600,000) budget amounts. The amounts in the March 15, 2017, Settlement Agreement originated from the April 2016 testimony of Christian Brouillard and Stephen Hall and, accordingly, did not include 2016 budgeted amounts as that year was already underway. The \$600,000 budgeted for 2016 was included in the 2016 E-22 and in the original calculation of the step adjustment that took effect on May 1, 2017.<sup>1</sup> The \$3,600,000 for 2017 was included both on the 2017 E-22 and in the Settlement Agreement. The 2018 amount in the Settlement Agreement is beyond the years that are included on Bates 019 and 022 of the Tebbetts/Strabone Testimony.

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<sup>1</sup> The actual amount spent during 2016 was \$447,126 (see Bates 024 of the March 15, 2017, Settlement Agreement: [https://www.puc.nh.gov/Regulatory/Docketbk/2016/16-383/LETTERS-MEMOS-TARIFFS/16-383\\_2017-03-15\\_GSEC\\_ATT\\_STIP\\_SETTLEMENT.PDF](https://www.puc.nh.gov/Regulatory/Docketbk/2016/16-383/LETTERS-MEMOS-TARIFFS/16-383_2017-03-15_GSEC_ATT_STIP_SETTLEMENT.PDF))

- b. As stated in the response to Staff 13-5, the 14L4 getaway cable project took place over multiple years. The \$1,350,000 is the combination of the 2016 (\$350,000) and 2017 (\$1,000,000) budget amounts. The \$400,000 amount in the March 15, 2017, Settlement Agreement originated from the April 2016 testimony of Christian Brouillard and Stephen Hall and, accordingly, did not include 2016 budgeted amounts as that year was already underway. The \$350,000 budgeted for 2016 was included in the 2016 E-22 and in the original calculation of the step adjustment that took effect on May 1, 2017.<sup>2</sup> The \$400,000 that was originally budgeted for 2017 was an early budget estimate that was included in the Brouillard/Hall testimony, and was later updated to \$1,000,000 by the time the 2017 E-22 was submitted. The amount in testimony, however, was never updated and it remained in place through the finalization of the Settlement Agreement.

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<sup>2</sup> The actual amount spent during 2016 was \$143,195 (see Bates 024 of the linked document referenced in Footnote 1).