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May 14, 2021

Via Electronic Mail Only

Debra Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, New Hampshire 03301

Re: Docket No. DG 19-064; Liberty Utilities (Granite State Electric) Corp.
Notice of Intent to File Rate Schedules

Dear Ms. Howland:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, attached for filing in the above docket, please find the *Technical Statement of Heather M. Tebbetts*, in support of the Company's request pursuant to Puc 1605 for a change in Rate M tariff language.

As explained in the technical statement, the purpose of the proposed tariff change is to address the situation involving the failure of a non-LED lighting fixture (*e.g.*, a high pressure sodium, or HPS, fixture) of a private lighting customer being served under Rate M, when the customer chooses to replace the HPS fixture with an LED fixture under Rate LED-1. Currently, such a request is considered a "conversion" to LED and thus involves paying a \$50 fee, paying the undepreciated value of the HPS fixture, and waiting for a second visit by the Company's troubleshooter to install the LED fixture. If the same customer chose to replace the HPS fixture with another HPS fixture, that would be considered a "replacement" which carries no fee and no requirement to pay the undepreciated value of the failed fixture.

The proposed tariff changes in this filing are intended to allow for customers who replace failed HPS fixtures with LED to be treated the same as those customers who choose to replace HPS with HPS, continuing with the above example.

The benefits of the proposed tariff changes include: encouraging customers to choose LED fixtures when their older, less efficient, fixtures fail; allowing for more timely replacement of failed fixtures; saving the cost of the Company having to make two trips for a failed fixture; and improved customer satisfaction. Any cost impacts of foregoing the \$50 fee and collection of the undepreciated value of the old fixtures, to the extent not offset by avoiding a second trip to the customer's location, are *de minimus*.

Puc 1605.01(a) defines “service or tariff change” as “any proposed change in any rate, fare, charge, price or the terms or conditions under which service shall be provided,” but does not “result[] in a significant change to the return on the cost of the property of the utility used and useful in the provision of services, less accrued depreciation,” Puc 1505.01(b), which would necessitate a “Full Rate Case Filing” pursuant to Puc 1604. As described above, the tariff changes proposed here will not cause a “significant change to the return on the cost of the property of the utility.” As stated in the technical statement, this change will affect approximately 10 fixture replacements per year. Thus, the Company makes this filing pursuant to Puc 1605.

In compliance with Puc 1605.02, the filing includes this cover letter summarizing the proposed tariff change, annotated and clean tariff pages showing the proposed changes, and Ms. Tebbetts’ supporting technical statement.

The Company proposes that this tariff change go into effect at the same time as the second step adjustment that was approved in this docket, which is July 1, 2021.

Pursuant to the Commission’s March 17, 2020, secretarial letter, only electronic versions will be filed.

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