

THE STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

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

Docket Nos. DE 17-189, DE 19-064, and DE 20-170
Response to Letter of Non-Compliance

Technical Statement of Erica L. Menard

February 24, 2023

A. Purpose of Technical Statement

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, (“the Company” or “Liberty”) is filing this technical statement in response to the Commission’s Letter of Non-Compliance dated December 7, 2022, and Procedural Order issued in Docket No. DE 22-024 on February 17, 2023, where the Commission directed the Company to refile the tariff pages for the above-mentioned dockets in a manner sufficient for the Commission to determine compliance with the relevant orders; enclosed are redline and clean pages of the tariff pages as directed. The Commission also directed the Company to file technical statements explaining the methodology supporting the tariff calculations in the corresponding dockets.

B. Battery Storage and Electric Vehicle Time of Use Models, Docket Nos. DE 17-189 and DE 20-170

In Docket No. DE 17-189, the Commission approved the methodology for time-of-use rates in Order No. 26,209 (January 17, 2019). The Settlement Agreement was submitted with technical statements describing the terms of the settlement and explaining the time-of-use (TOU) rate modeling that was part of the agreement. Hearing Exhibit 20 in this docket contains the Technical Statement Regarding Time-of-Use (TOU) Model of Heather Tebbetts, Lon Huber, and Clifton Below. This technical statement describes the methodology for calculating the TOU rates for Pages 125 and 126 for Rate D-11 Battery Storage Pilot and Pages 123 and 127 for Rate EV Plug-In Electric Vehicle D-12 rates.

The Company uses the approved model associated with these rates and updates the model when there is an approved rate change in Distribution, Transmission, or Energy Service rates. In addition, the TOU rates change seasonally in November and May and the Company’s tariff is updated with the most current rates for that season. The TOU model approved in DE 17-189 to calculate the rates for Rate D-11 Battery Storage Pilot, is used to calculate Rate EV Plug-In Electric Vehicle D-12, as approved in DE 19-064 in Order No. 26,376 (June 30, 2020).

Liberty is providing the Commission with the confidential live Excel DE 17-189/DE 19-064 TOU model supporting the November 1, 2022, rate change. The key author of the model, Lon Huber, formerly of Strategen Consulting, expressly insisted on confidential treatment of his proprietary work, authorizing only the parties to DE 17-189 to use the model for adjusting the TOU rates going forward. Liberty thus asserts confidentiality pursuant to RSA 91-A:5, IV, which excludes “confidential, commercial, or financial information” from the law’s

requirement to allow access to government records.

The model uses Liberty residential load data, ISO New England peak hour and load data to allocate costs associated with distribution, transmission, and energy service.

- To update the distribution costs, the user inputs the latest approved annual revenue requirement for Rate D less the customer charge in the D Calc S tab, cell Q17 which will carry forward into the D Calc W tab, cell Q17 for the winter period.
- To update the transmission costs, the user enters the forecasted kWh from the approved Transmission rate filing on the T allocations tab in cells B30 through B41. On tab TOU Rate Summary, the user enters the total Rate D transmission rate in cell M22, and the transmission only portion of the rate in cell M23.
- To update the Default Energy Service rate, the user enters the forecasted kWh from the approved Default Energy Service rate filing in the ES allocations tab, cells J6 through J11 for the Feb–Jul period and cells P6 through P11 for the Aug–Jan period. The user also enters total revenues and total costs into cells N14/T14 and J14/O14, respectively on the ES allocations tab corresponding to the six-month filing.
- The approved average RPS rate from the Default Energy Service rate filing is entered into cell C10 on the TOU Rate Summary tab.
- The approved Stranded Cost Charge is entered into cell C29 on the TOU Rate Summary tab.
- The approved residential System Benefits Charge is entered into cell C30 on the TOU Rate Summary tab.
- The above changes create the rates to be charged to customers for the TOU rate components as shown on the TOU Rate Summary tab.

The Company would like to offer an in-person technical session if the Commission wishes to review the D-11 and D-12 rate time-of-use model with the Company.

C. EV-L and EV-M Time of Use Models, Docket No. DE 20-170

In Docket No. DE 20-170, the Commission approved the methodology for time-of-use rates in Order No. 26,604 (April 7, 2022). With regard to the EV-L and EV-M rates on tariff pages 127, 128, 129, and 133, Exhibits 8 and Exhibit 24 Revised, Attachment A Illustrative Rates in DE 20-170 provide the methodology for the rate calculations. EV-L and EV-M rates are updated when the seasons change in November and May and when there is an approved rate change in Distribution, Transmission, or Energy Service rates. Approved rate information is input to the model on the Liberty Distribution Revenues tab, the Liberty Transmission Costs tab, or the Generation ES Charge tab. The Company is providing the live Excel models associated with the November 1, 2022, rate change.

In the Commission’s Letter of Non-Compliance dated December 7, 2022, the Commission noted that the Company did not respond to a letter dated August 4, 2022. The Company would like to point the Commission to a response filed on December 30, 2022, where the Company provided a response and live Excel models as requested. At this time, the Company believes it has complied with the request for information.

The Company would like to offer an in-person technical session if the Commission wishes to review the EV-L and EV-M rates time-of-use models with the Company.

D. Tariff Updates

The Company is submitting revised redlined and clean tariff pages as attachments to this technical statement. The Company wishes to make the Commission aware of minor format changes to pages 126 and 127. In the Fourteenth Revised Page 127, Rate EV-L and EV-M were not previously included. Those rates are now included in Fifteenth Revised Page 127. The redlined rates reflect previously approved rates from Pages 128, 129, and 133.