



Michael J. Sheehan, Esq.
Director, Legal Services
Phone: 603-724-2135
Email: Michael.Sheehan@libertyutilities.com

June 15, 2023

Via Electronic Mail Only

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: Docket Nos. DE 20-170, DE 22-035, and DE 23-006; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Response to May 15, 2023, Tariff Compliance Letter**

Dear Chairman Goldner:

In response to the letter filed on May 15, 2023, on behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, the Company provides the following information in one filing with an over-arching cover letter summarizing and mapping each change to facilitate the Commission's review of the above-mentioned tariff compliance filings, as requested by the Tariff Administrator.

Docket No. DE 20-170 EV-Time-of-Use Rates

For both the July 10, 2022, and November 1, 2022, filings, the Company was requested to provide the following:

- (i) associated EV-L and EV-M rate design models;
- (ii) summary tables linking and sourcing the input for the G-1 and G-2 revenues used in the EV-L and EV-M models; and
- (iii) a written explanation that points to the exact tab/row/column to refer to in the source spreadsheets.

July 10, 2022, Rates

Requirement (i): Associated EV-L and EV-M rate design models

Liberty has enclosed the attachments listed below as requested for the rates effective July 10, 2022.

- 20-170_2023-04-13_Liberty Model_tariff EV-L rev_eff 2022-07-10.xlsx
- 20-170_2023-04-13_Liberty Model_tariff EV-M rev_eff 2022-07-10.xlsx
- Att. DE 19-064 rev req Order No. 26,537.xlsx

Requirement (ii): Summary tables linking and sourcing the input for the G-1 and G-2 revenues used in the EV-L and EV-M models

The table below provides references to the specific source workbooks or dockets approving the inputs within the models. The PUC may tie the numbers in the tab Liberty Distribution Revenues in each model (attachments 20-170_2023-04-13_Liberty Model_tariff EV-L rev_eff 2022-07-10.xlsx and 20-170_2023-04-13_Liberty Model_tariff EV-M rev_eff 2022-07-10.xlsx) to the source inputs listed in the table below. For transmission and energy service rates, the Bates pages to each filing are also listed in the table below.

DE 20-170 7-10-2022 Summary Table

Rate	Charge	Reference File	Reference	
			Tab	Reference Cells
G-1 -> EV-L	Distribution	Att. DE 19-064 rev req Order No. 26,537.xlsx	rates calc	R33, R34
G-2 -> EV-M	Distribution	Att. DE 19-064 rev req Order No. 26,537.xlsx	rates calc	R39, R40
EV-L, EV-M	Transmission	DE 22-018 Bates 48		Line No. 4
EV-L, EV-M	Energy Service	DE 21-087 12/17/2021 Filing Bates 131		Line No. 14
EV-L, EV-M	Energy Service	DE 22-024 6/13/2022 Filing Bates 119		Line No. 17

The rates effective July 10, 2022, were approved in Order No. 26,537 dated October 29, 2021. In that Order, the Commission approved \$1,232,187 of investment costs associated with the battery storage pilot. During the subsequent audit, \$46,062 was found to be Contributions in Aid of Construction ("CIAC"), and \$599,510 was attributable to Cost of Removal inadvertently included in the original filing on April 6, 2021. Given these audit findings, the calculation of the total to be allowed for recovery was \$586,615, ($\$1,232,187 - \$46,062 - \$599,510 = \$586,615$), and as such those amounts were removed from the total amount to be included in rates for November 1, 2021. The final approved revenue requirement of \$94,064, is shown in Attachment DE 19-064 rev req Order No. 26,537.xlsx, tab rev req Line No. 1. There was no distribution rate change between November 1, 2021, and July 10, 2022.

November 1, 2022, Rates

Requirement (i): Associated EV-L and EV-M rate design models

Liberty has enclosed the attachments listed below as requested for the rates effective November 1, 2022.

- Att. HMT-1 DE 22-035 reference 8-1-2022 rates.xlsx
- 20-170_2023-04-13_Liberty Model_tariff EV-L rev_eff 2022-11-01 rev 5-16-2023.xlsx
- 20-170_2023-04-13_Liberty Model_tariff EV-M rev_eff 2022-11-01.xlsx
- Fifteenth Revised Tariff Page 127
- Second Revised Tariff Page 128

The table below provides references to the specific source workbooks or docketed approving the inputs within the models. The PUC may tie the numbers in the tab Liberty Distribution Revenues in each model (attachments 20-170_2023-04-13_Liberty Model_tariff EV-L rev_eff. 2022-11-01 rev 5-16-2023.xlsx and 20-170_2023-04-13_Liberty Model_tariff EV-M rev_eff 2022-11-01.xlsx), to the source inputs listed in the table below. For transmission and energy service rates, the Bates pages to each filing are also listed in the table below.

The November 1, 2022, filing was a seasonal change and therefore the rate change did not incorporate new data, it merely included the winter rates from tab TOU Rate Summary (Testimony). As noted in the Company's response to the May 15, 2023, letter in Docket No. DE 22-035, Second Revised Tariff Page 128 has been corrected due to the numbers used to calculate the distribution rates being incorrect in the model. Second Revised Tariff Page 128 and Fifteenth Revised Tariff Page 127 is provided with the correct value for the distribution TOU rates in the Company's November 1, 2022, compliance tariff filing.

DE 20-170 11-1-2022 Summary Table

Rate	Charge	Reference File	Reference	
			Tab	Reference Cells
G-1 -> EV-L	Distribution	Att. HMT-1 DE 22-035 reference 8-1-2022 rates.xlsx	rates calc	V33, V34 + V35 + V36
G-2 -> EV-M	Distribution	Att. HMT-1 DE 22-035 reference 8-1-2022 rates.xlsx	rates calc	V39, V40 + V41
EV-L, EV-M	Transmission	DE 22-018 Bates 48		Line No. 4
EV-L, EV-M	Energy Service	DE 21-087 12/17/2021 Filing Bates 131		Line No. 14
EV-L, EV-M	Energy Service	DE 22-024 6/13/2022 Filing Bates 119		Line No. 17

Docket No. DE 22-035 Request for Step Adjustment

For the August 1, 2022, filing, the Company was requested to provide the following:

- (i) summary tables linking and sourcing the input for the G-1 and G-2 revenues used in the EV-L and EV-M models; and

(ii) a written explanation that points to the exact tab/row/column to refer to in the source spreadsheets.

In response to the letter filed on May 15, 2023, the Company provides the following information as requested by the letter.

(i) a summary table correctly linking and sourcing the input for the G-1 and G-2 revenues used in the associated EV-L and EV-M models; and

(ii) a written explanation that points to the exact tab/row/column to refer to in the source spreadsheets.

The table below provides the references that may be found in the models. This rate change affected distribution rates only. In reviewing the model data, attachments 22-035_2023-04-13_Liberty Model_tariff EV-L rev_eff. 2022-08-01 rev 5-16-2023.xlsx, and 22-035_2023-04-13_Liberty Model_tariff EV-M rev_eff. 2022-08-01.xlsx, the PUC should tie the numbers in the tab Liberty Distribution Revenues in each model to the following tabs and cells listed in the table below.

DE 22-035 8-1-2022 Summary Table

Rate	Reference File	Reference Tab	Reference Cells
G-1 -> EV-L	Att. HMT-1 DE 22-035 reference 8-1-2022 rates.xlsx	rates calc	V33, V34 + V35 + V36
G-2 -> EV-M	Att. HMT-1 DE 22-035 reference 8-1-2022 rates.xlsx	rates calc	V39, V40 + V41

Liberty has enclosed the attachments listed below associated with its April 13, 2023, filing. When reviewing the model data for the August 1, 2022, change, the reviewer will see in comparison to the July 10, 2022, model data the off-peak kilowatt-hours and the credit for high voltage from the kWh line on tab Liberty Distribution Revenues were omitted in the July 10, 2022, rates calculation. The Company incorporated those charges in the August 1, 2022, rate change going forward.

- Att. HMT-1 DE 22-035 reference 8-1-2022 rates.xlsx
- 22-035_2023-04-13_Liberty Model_tariff EV-L rev_eff. 2022-08-01 rev 5-16-2023.xlsx
- 22-035_2023-04-13_Liberty Model_tariff EV-M rev_eff. 2022-08-01.xlsx

Finally, the Commission also requested Liberty to file the associated models to support rates changes associated with other dockets that may be affected by the original correction. There are no other dockets affected by the original correction.

Daniel Goldner, Chairman
20-170, 22-035, 23-006

Please do not hesitate to contact me with any questions. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael J. Sheehan

Enclosures

Cc: Service Lists