

**From:** Robert West  
**Sent:** Friday, June 23, 2023 12:13 PM  
**To:** PUC: Clerks Office <ClerksOffice@puc.nh.gov>  
**Subject:** RE: DE 23-039

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*Honorable Chairman Goldner,*

*I wish to file the following comments as a current customer of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty:*

*Having reviewed the petition in its entirety, while the applicant may be entitled an increase of rates to satisfy Docket No DG 19-064, this is not in the public's best interest at this time.*

*According to testimony of Liberty counsel Michael J. Sheehan: "this under-earning is primarily the result of the Company's significant investment in non-revenue producing capital projects that are necessary for the provision of safe and reliable service as described in the Direct Testimony of Anthony Strabone. Unless rate relief is granted, the Company will not earn a reasonable return on the cost of its property that is used and useful in the public service, resulting in a confiscation of the Company's property."*

*Having reviewed Mr. Straborne's testimony in depth, it is clear to me that the majority of said investment has and will continue to be made to accommodate growth in the Southern portion of the state of New Hampshire. I have two main issues with this:*

- 1) While I certainly support reliability improvements (and have worked personally with the Lebanon office in doing so), the balance of Liberty's service region should not bear the brunt of massive capital investments to handle additional customers in Southern New Hampshire.*
- 2) Furthermore, it is obfuscating the truth to state that these improvements are non-revenue producing. Besides physically tying a feed into someone's home, what actual portion of the distribution system CAN produce revenue by itself? None. Each component of the electrical distribution system works together to serve the same purpose, delivery energy to residents and businesses. That is where the revenue is made. With the completion of each project, Liberty will have the additional capacity and reliability to add additional customers and thus receive further income. The applicant is attempting to justify these "non-revenue" producing expenses in an attempt to double dip. Sorry, but it costs money to make money.*

*I request that the motion be denied for both temporary and permanent rate increase at this time and Liberty come back once additional funding mechanisms are evaluated if these projects must be executed in the next 3 years. This country just exited an unprecedented health crisis and is still suffering from inflationary levels where families are effectively making less than 3 years ago with the increased cost of living. Now is the not the time to further burden us.*