

Before the New Hampshire Public Utilities Commission

DE 23-039

**Liberty Utilities (Granite State Electric) Corp. D/B/A
Liberty**

Request For Change in Distribution Rates

NH Department of Energy Data Requests- Set 11

October 5, 2023

- 11-1. Reference Testimony of Balashov and Strabone starting on Bates II-657, regarding the Liberty’s application to the US DOE for funding under the GRIP grant program. Please provide all supporting documentation related to this application, including the application, the company’s detailed costs of the total project, Liberty’s share of the total project, an analysis of why these projects were chosen for the application, the paperwork with management approval for such projects and application, and all other paperwork and live excel spreadsheets related to this application.
- 11-2. Reference Testimony of Menard (Regulatory Issues), starting on Bates p. II-625 regarding line extension policy. Please provide the following information, in a live excel spreadsheet:
 - a. For each line extension completed in 2022, the length of the line extension, the total cost of the line extension, the costs paid by the customer, the costs paid by the company, any CIAC calculations, any CIAC paid, length of any credit, the rate class of the customer(s), the type of customer of development and the applicable line extension policy, the number of customers served, single phase or three phase, underground or overhead, the length of the any part of the extension on private property, and other applicable information that was used to as part of the current line extension policy or will be needed as part of the proposed line extension policy.
 - b. For each line extension completed in 2021, please provide the information listed in a.
 - c. For each line extension completed in 2020, please provide the information listed in a.
- 11-3. Reference Testimony of Menard (Regulatory Issues), starting on Bates p. II-627, regarding non-recurring charges. Please provide the following information:
 - a. For each of the services listed in Table 3 on Bates p. II-628, for each year from 2016 to 2022, please provide the number of occurrences for each service, the total cost of providing such service, the total cost charged to the customers, the total cost in rate base for each service, and any supporting data used to calculate the costs, including the labor rates, mileage rates, etc.

- b. In Table 3 on Bates p. II-628, please provide all supporting data for these charges, including the labor rate, mileage rate, and any other data that was used to calculate the proposed charges.
- c. Reference Table 4 on Bates p. II-629, please provide the 2022 actual costs for each service provided. If the 2022 costs differ from the adjustment and proforma amounts listed, please justify why such adjustments and proforma amounts should be used, especially given that Liberty has chosen 2022 as the test year from which to base its revenue requirement.

11-4. Reference Testimony of Dmitry Balashov regarding Liberty’s planned Phase 2 of the existing utility owned batteries. Starting on Bates p. II-685, beginning on line 9, which states “A key value feature of the program is the fact that Liberty holds a contract that would enable Phase 2 battery units’ procurement at costs that would be approximately 30% lower than current market prices for similar units.”

Please explain how this does not provide an unfair cost advantage to Liberty’s utility-owned program verses the customer-owned Bring Your Own Device (BYOD) program.

11-5. Reference Testimony of Dmitry Balashov regarding which technologies or vendors does the Company propose to be eligible for inclusion in the BYOD program. Beginning on Bates p. II-680, line 11 which states “However, a key initial consideration is to initially limit the program eligibility to stationary battery storage installations that would be configurable to operate in a manner consistent with the Tesla Powerwall units used in Phase 1 of the pilot.”

Please provide detailed explanation of how the batteries will be required to operate.

11-6. Referencing the direct testimony of Melissa F. Bartos, beginning on Bates page II-761 line 19, “The Company provided Concentric with plant balances and distribution O&M, customer, customer accounting, A&G, and Materials and Supplies and Prepayments Expenses, for the period 1997 to the present. In addition, the Company provided Concentric with historical system peak, normalized peak, and customer count data for the years 2000 to the present.”

- d. Please provide these datasets in Excel format.

11-7. Reference the direct testimony of Melissa F. Bartos, Bates page II-762 lines 5-9, “I adjusted the Company’s data to constant dollars using an appropriate price index. I used a Handy-Whitman index to restate plant additions in 2022 constant dollars, and I used the Implicit Price Deflator for Gross Domestic Product, published by Bureau of Economic Analysis, to restate expenses in constant 2022 dollars.” (Page 4.)

- e. Please provide the Company’s data and live Excel files or code that is used to adjust the Company’s data.

11-8. Referencing the direct testimony of Melissa F. Bartos, Bates page II-762 lines 10-13, “I used two analyses provided by the Company to (1) identify the amount of the capacity-related distribution plant additions related to growth, and (2) classify the growth-related plant additions as being related to either the primary distribution system, secondary distribution system, or line transformers.”

- f. Please provide the two analyses provided by the Company.
- g. Please provide the underlying data used to aggregate and calculate plant additions in Excel format.

11-9. Reference the direct testimony of Melissa F. Bartos, Bates page II-762 lines 14-18, “I used an analysis of expense accounts provided by the Company to functionalize distribution Operations expenses and Maintenance expenses as either capacity-related or customer-related, and also to classify the capacity-related expenses as being related to either the primary distribution system, secondary distribution system, or line transformers.”

- h. Please provide the analysis of expense accounts provided by the Company.
- i. Please provide the underlying data and Excel workbook or code you used to functionalize the distribution Operation expenses and Maintenance expenses.
- j. Please provide the underlying data and Excel workbook or code you used to classify capacity-related expenses.

11-10. Reference data response Attachment 23-039 DOE 7-46, the input data used to carry out the regression analysis was provided in Attachment 23-039 DOE 7-46. Please provide the underlying data and live Excel file or code used to create the aggregate annual amounts.

11-11. Reference Proposed Tariff Pages, Bates p. III-073 regarding line extension policy.

10. "Additional Engineering" states that, "[w]hen in the Company’s opinion, more than 32 hours of engineering is required to determine the method of service or prepare construction estimates, the Company will estimate the cost of such engineering. The Company may charge the Customer the excess of 32 hours of engineering before engineering begins. If construction is undertaken, this payment will be applied to any required construction advance."

- a. The Company's current tariff in effect does not include the above-referenced language. Why is the Company including this language in its proposed tariff?

- b. How did the Company arrive at 32 hours as the specific number of hours?
- c. What costs are included in determining the method of service or preparing construction estimates? Under what scenarios would the Company incur these costs?
- d. Does the Company anticipate any difference in the amount of additional engineering hours, as referenced above, between the rate classes as separated by the four different policies under the current tariff (i.e., Individual Residential Customers, Commercial and Industrial Developments, etc.)?
- e. How will the Company determine that more than 32 hours of engineering is required? What factors (i.e., location, weather, etc.) are included in that decision?
- f. How will the Company determine the cost estimates?
- g. When will the Company provide the Customer with the cost estimate?
- h. If, after the Customer has paid the additional cost estimate, the amount of additional engineering time ends up being less than 32 hours, will the Company refund the payment to the Customer?
- i. If the additional engineering charge paid by the Customer is ultimately greater than the amount of the required construction advance, how will the additional engineering payment be treated?

11-12. Reference Proposed Tariff Pages, Bates p. III-073 regarding line extension policy.

11. "Tree Trimming/Removal" states that the Customer is responsible for all tree trimming and/or removal associated with the line extension construction. The Company's current tariff states that the Company is responsible for blasting and tree trimming and removal along public ways, while the Customer is responsible for blasting and tree trimming and removal on private property.

Does the proposed tariff language mean that the Company's obligation under the current tariff to pay the above-referenced costs along public ways would be the Customer's responsibility under the proposed tariff?

11-13. Reference Docket No. DE 19-197 and the Statewide On-line Energy Data Platform:

- a. Please indicate whether any cost associated with or attributable to the Statewide On-line Energy Data Platform are included in the revenue requirement in this rate case.
- b. Please indicate whether any of the SAP/Customer First software programs or elements included in the proposed rate base have been undertaken to satisfy any requirements placed on Liberty by the Statewide Data Platform. If yes, please describe in detail and quantify such investments attributable to the Statewide On-line Energy Data Platform.

11-14. Concerning the discrepancies detailed below between the Company’s FERC Form 1 and the Rate case filing:

	FERC Form 1 and SAP	Filing RR-2.10	FERC minus RR-2.10 Variance
Account 922 Administrative Expenses Transferred-Credit	\$(8,002,460)	\$(8,501,412)	\$498,952
Account 926 Employee Pensions and Benefits	\$3,697,502	\$4,053,502	\$(356,000)

Liberty provided explanations regarding these two variances to DOE’s Audit team and further stated: *“The Company, along with our external auditors, determined to not reflect these adjustments in the FERC Form 1 to align with previously presented financial information in the APUC Form 10-K Annual Report and Granite State Electric standalone financial statements. The adjustments were correctly reflected in the Revenue Requirement.”*

- a. Please identify any other such discrepancies where Liberty opted not to adjust Liberty’s FERC Form 1 but adjusted its rate case revenue requirement filing.