

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

DE 23-039

Distribution Service Rate Case

Department of Energy Data Requests - Set 1

Date Request Received: 5/24/23
Request No. DOE 1-1

Date of Response: 6/5/23
Respondent: Todd Schavrien

REQUEST:

Please provide live Excel versions of all spreadsheets associated with the Testimony and Attachments filed in the docket on May 5, 2023 in the above-captioned matter.

RESPONSE:

Please see Attachment DOE 1-1_1.zip, which contains live Excel versions of all spreadsheets associated with the following testimonies and attachments filed in Docket No. DE 23-039 on May 5, 2023:

Testimony	Attachment
Kristin M. Jardin, Daniel S. Dane, and Gregg H. Therrien – Request for Temporary Rates	Attachment DOE 1-1.1
Kristin M. Jardin and Daniel S. Dane – Revenue Requirement, Multi-Year Rate Plan, and Permanent Rates	Attachment DOE 1-1.2 Attachment DOE 1-1.3
Anthony Strabone – Operations	Attachment DOE 1-1.4
Heather Green and J. M. Sparkman Jr. – Vegetation Management	Attachment DOE 1-1.5*
Erica L. Menard – Regulatory Issues	Attachment DOE 1-1.6
Todd J. Schavrien – Lead/Lag and Cash Working Capital	Attachment DOE 1-1.7
Gregory Tillman – Advanced Rate Design	Attachment DOE 1-1.8 Attachment DOE 1-1.9 Attachment DOE 1-1.10

* This attachment reflects minor typographical and/or wording corrections to Attachment HG-4 that do not alter the substance of the filed document, or the relief requested therein. Specific corrections are highlighted in yellow for your convenience.

Please see Attachment DOE 1-1_2.zip, which contains live Excel versions of all spreadsheets associated with the following testimonies and attachments filed in Docket No. DE 23-039 on May 5, 2023:

Testimony	Attachment
Gregory Tillman (cont'd) – Advanced Rate Design	Attachment DOE 1-1.11 Attachment DOE 1-1.12 Attachment DOE 1-1.13

Please see Attachment DOE 1-1_3.zip, which contains live Excel versions of all spreadsheets associated with the following testimonies and attachments filed in Docket No. DE 23-039 on May 5, 2023:

Testimony	Attachment
Gregory Tillman (cont'd) – Advanced Rate Design	Attachment DOE 1-1.14 Attachment DOE 1-1.15
Gregg H. Therrien – Rate Design	Attachment DOE 1-1.16 Attachment DOE 1-1.17 Attachment DOE 1-1.18
Melissa F. Bartos – Marginal Cost Study	Attachment DOE 1-1.19
Ann E. Bulkley and Christopher M. Wall – Return on Equity	Attachment DOE 1-1.20 Attachment DOE 1-1.21 Attachment DOE 1-1.22 Attachment DOE 1-1.23 Attachment DOE 1-1.24 Attachment DOE 1-1.25 Attachment DOE 1-1.26 Attachment DOE 1-1.27
John Spanos – Depreciation Study	Attachment DOE 1-1.30 Attachment DOE 1-1.31

Please see Confidential Attachment DOE 1-1_4.zip, which contains live Excel versions of all spreadsheets associated with the following testimonies and attachments filed in Docket No. DE 23-039 on May 5, 2023:

Testimony	Attachment
Ann E. Bulkley and Christopher M. Wall – Return on Equity	Attachment DOE 1-1.28-CONFIDENTIAL
Shawn Eck – Cybersecurity	Attachment DOE 1-1.29-CONFIDENTIAL

Attachment DOE 1-1.28-CONFIDENTIAL contains a collection of rate case results across the country that was compiled by a third party through a subscription service that Liberty’s

consultant has with that provider, S&P. A condition of the subscription is that S&P's customer, Liberty's consultant, must keep the information confidential to preserve the value of S&P's product. The information is thus proprietary information of S&P, which has taken steps to preserve its confidentiality. S&P's competitive position would be harmed if other firms had unrestricted access to this information. Therefore, pursuant to Puc 203.08(d), the Company has a good faith basis to seek confidential treatment of this information and will submit a motion seeking confidential treatment prior to the final hearing in this docket.

Attachment DOE 1-1.29-CONFIDENTIAL contains the cybersecurity budget and descriptions of the various future budget items for Liberty and the entire family of Liberty affiliates. Information of the Company's budget amounts, priorities, and scheduling is protected from disclosure pursuant to RSA 91-A:5, XI ("Records pertaining to information technology systems, including cyber security plans, vulnerability testing and assessments materials, detailed network diagrams, or other materials, the release of which would make public security details that would aid an attempted security breach or circumvention of law as to the items assessed"). Therefore, pursuant to Puc 203.08(d), the Company has a good faith basis to seek confidential treatment of this information and will submit a motion seeking confidential treatment prior to the final hearing in this docket.

Given the inability to redact confidential information effectively and efficiently from live Excel files, the Company will not be providing public versions of the two confidential attachments.