

STATE OF NEW HAMPSHIRE

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June 4, 2014

NHPUC 4JUN2148:32

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

RE: DG 11-040 Liberty Utilities – Electric Customer Account Conversion

Dear Ms. Howland:

Based on information provided by Liberty Utilities representatives at the status conference held before the Commission on May 27, 2014, the Report on Dress Rehearsal Conducted May 23-26, 2014 filed by Liberty on May 30, 2014, and subsequent detailed discussions with representatives of Liberty and National Grid USA, Staff has concluded that Liberty and National Grid appear to have taken reasonably adequate steps to date in order to prepare for the conversion of Liberty's electric customer accounts from National Grid's systems to Liberty's systems over the July 3-7, 2014 holiday weekend period.

Neither Liberty nor National Grid has indicated that any critical path problems or errors have been identified that would require a delay in the proposed conversion schedule. Both Liberty and National Grid have confirmed their belief that the conversion may be completed as scheduled, given a reasonable tolerance for minor and/or manageable errors. It appears that both companies have devoted substantial resources and attention to the planned conversion activities and intend to continue the required level of effort through completion of the conversion process.

Liberty has described actions taken to address many of the customer billing issues identified by Staff and discussed at length during the May 27th status conference, as well as its adoption of process and system changes as a result of its experience during and after the gas customer conversion which occurred in September 2013. Liberty has represented that its personnel have received training in the relevant systems and processes, and are generally more experienced than was the case at the time of the gas customer conversion. Further, internal conversion readiness workshops have been conducted by Liberty and a joint Liberty-National Grid conversion readiness workshop has been conducted, something which did not occur prior to the gas customer conversion in 2013. Liberty has

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confirmed that systems testing continues to be performed, and that other related system transitions are on track to be completed prior to or in conjunction with the electric customer conversion.

Staff has considered the information provided and representations made by Liberty and National Grid and, based on such information and representations, it appears Liberty has taken appropriate steps such that the planned electric customer conversion may be completed without significant adverse consequences. Staff trusts that Liberty will exercise prudent judgment to revise its plans and schedule for the conversion if warranted by any changed circumstances, including, but not limited to, adverse testing results or the unavailability of adequate resources.

Staff therefore does not recommend that the Commission take action at this time to postpone or delay Liberty's planned conversion of electric customer accounts from National Grid's systems to Liberty's systems, currently scheduled to occur during the July 3-7, 2014 holiday weekend period.

Sincerely,

A handwritten signature in blue ink that reads "Amanda O. Noonan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Amanda O. Noonan
Director, Consumer Affairs

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

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b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.

c) Serve a written copy on each person on the service list not able to receive electronic mail.