


Dartmouth College

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Facilities Operations & Management

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 Frank A. Roberts, P.E.
 Associate Vice-President

 Debra A. Howland
 Executive Director
 New Hampshire Public Utilities Commission
 21 South Fruit Street, Suite 10
 Concord, N.H. 03301-2429

October 4, 2013

Re: DE 13-063; Granite State Electric Company d/b/a Liberty Utilities Permanent Distribution Rates

Dear Ms. Howland:

Please accept this letter as Dartmouth College's formal opposition to the electric distribution rate increase proposed by Liberty Utilities in the above-referenced docket.

If electric distribution rates proposed by Liberty were adopted, the College would experience a significant and immediate negative impact to its operating expense and budget. While the College has invested heavily in equipment and emerging technology to conserve and/or self-generate power it largely remains a captive consumer of electricity. Accordingly, like most consumers, the College is without a viable alternative to avoid the proposed increase.

Furthermore, as a nonprofit educational institution, Dartmouth College does not possess the capacity to "pass through" the increased costs that would result from Liberty's proposed rate increase (Liberty's filings estimate an average customer increase of 18%). The increase would have to be absorbed by the College and, by extension, its students, faculty and the community.

Although it would be unrealistic to expect utility rates to remain constant, it is paramount to the effective operation of the College, and to consumers throughout the Upper Valley, that any increases be reasonable and sustainable. It is fundamentally unreasonable, and financially untenable, for Liberty to raise its distribution rate in such a dramatic manner. At a minimum, a more modest rate increase, phased gradually in over time, would allow the College and other consumers to continue to take steps to reduce their energy consumption and dependency and/or make necessary budgetary adjustments to account for such increased costs. The economy has required all organizations to improve their operational efficiency. Liberty should be no different.

Dartmouth College therefore respectfully requests that the Commission reject Liberty's proposed rate increase.

Thank you for your consideration,

 Frank A. Roberts
 Associate Vice-President

 Cc: E. Arnold
 K. Packard