



NHPUC 9MAY18AM8:37

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May 9, 2018

Via Electronic Mail and Hand Delivery

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

**Re: Docket No. DE 17-149; Liberty Utilities (Granite State Electric) Corp.
Request for Approval of Tariff for Customer-Owned Underground Services**

Dear Ms. Howland:

On behalf of Liberty Utilities (Granite State Electric) Corp., I write to request an effective date of January 1, 2019, for the tariff change under consideration in this docket, for the following reasons.

This docket arose out of Granite State Electric's most recent rate case, Docket No. DE 16-383, in which the Company agreed to own new residential underground services. After consultation with Staff, the Company filed proposed tariff language to implement this change, which was expanded to include new underground commercial services, and initially asked to have the tariff approved as of March 1, 2018, in advance of the April 1 start of construction season.

The Commission issued Order No. 26,106 (Feb. 28, 2018), which suspended the tariff until May 27, 2018, scheduled a technical session for March 16, 2018, and a hearing for March 27, 2018. The Company filed final proposed tariff revisions on March 23, 2018, and the Commission conducted a hearing on March 27, 2018. The matter is now under Commission review with an order expected by the above-mentioned May 27 deadline.

Construction season began April 1. An order approving the tariff with an effective date during construction season would cause confusion and may give rise to customer complaints. For example, a customer who paid for an underground service under the existing tariff may complain if the Commission approves the new tariff and its provision that such a service would be installed at no cost.

Therefore, the Company respectfully asks for a January 1, 2019, effective date of the new tariff. Staff supports this request. The OCA did not participate in this docket.

Sincerely,

A handwritten signature in blue ink that reads "Michael J. Sheehan".

Michael J. Sheehan

cc: Service List