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April 11, 2023

Via Electronic Mail Only

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: Docket No. DE 17-189, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Battery Storage Pilot Program**

**Docket No. DE 19-064; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Notice of Intent to File Rate Schedules**

**Docket No. DE 20-170; Electric Distribution Utilities
Electric Vehicle Time of Use Rates**

Dear Chairman Goldner:

Pursuant to the Commission's March 22, 2023, Procedural Order in the above dockets, Liberty, the Department of Energy, and Commission Staff met in a technical session on March 29, 2023, to discuss the filing of compliance tariffs in these dockets and the way Liberty may file proposed and compliance tariffs in future dockets. On behalf of Liberty Utilities (Granite State Electric) Corp., I write to summarize the session.

As to the latest compliance tariffs filed in the above dockets on February 24, 2023, Liberty discovered an error not previously raised. In calculating the time of use (TOU) rates, the Company incorrectly included the customer charge revenues in the total distribution revenues that were allocated within the time of use rates. The customer charges should have been excluded from that allocation. The Company will file compliance tariff pages in the above dockets that make this correction.

In that compliance filing, the Company will use the date of filing as the "issued date" of the tariff pages and for the "effective date" of each page the Company will use the date of the relevant Commission orders that approved each rate to go into effect. The goal of this upcoming filing will be to provide the Commission with the paper trail that tracks the rate changes over time so that a reader

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can use the "effective" dates and determine the rates in effect at any time covered by the compliance pages.

As to future tariff filings, the Company's takeaway from the technical session is as follows.

First, when making a new filing the Company will provide "illustrative" redlined tariff pages that reflect the tariff changes proposed in the filing. By using the term "illustrative," and not "proposed," the filing will avoid triggering the rule that obliges the Commission to act on the "proposed" changes within 30 days. Puc 1603.07(a).

Second, illustrative tariff pages will show changes to the tariff in effect on the date of the filing. The most recent applicable Commission orders will determine the "tariff in effect on the date of filing," not the status of any pending review of compliance pages.

Third, illustrative tariff pages will not change the tariff page number in the header. That is, if the current tariff page is "Fourth Revised Page 5," then the illustrative tariff page will retain that same "Fourth Revised" header and not use "Fifth Revised Page 5."

Fourth, when making compliance filings after a Commission order, the compliance tariff will show redlined changes to the tariff in effect on the date that the compliance filing is made, again based on the most recent and applicable Commission orders.

Finally, to the extent any of the above is inconsistent with the Puc 1600 rules, Liberty will include with each filing a request to waive the rule that may dictate otherwise.

Thank you.

Sincerely,



Michael J. Sheehan

Cc: Service List