

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 19-197

Electric and Natural Gas Utilities

Development of a Statewide, Multi-use Online Energy Data Platform

REBUTTAL TESTIMONY OF

APRIL SALAS

October 23, 2020

On behalf of

The Town of Hanover

& the Local Government Coalition

1 Q. Please identify yourself and previous involvement in this docket.

2 A. I am April Salas, Sustainability Director, Town of Hanover, 41 South Main Street, Hanover,
3 NH 03755. I filed Direct Testimony on behalf of the Town of Hanover and Local Government
4 Coalition. I've also attended and participated in a number technical sessions including those before
5 the filing of testimony and collaborated in written commentaries during that process which are
6 referenced in Dr. Farid's and Clifton Below's testimony.

7 Q. What is your rebuttal testimony?

8 A. Eversource and Unitil (EU) asked me 3 discovery questions that clarified several points in
9 my direct testimony. I am submitting my responses to their discovery requests as my rebuttal
10 testimony. The standard discovery response formatting has been removed, except for the request
11 number line. A few minor (non-substantive) typos have been fixed.

12 **Request No. EU to LGC 1-019** **Witness & Respondent: April Salas**

13 Page 16, line 9: Please cite the regulatory authority mentioned that allows for a data request once
14 per year.

15 **RESPONSE:** See "Original Page 29" of Liberty Utilities Tariff and subsequent terms:
16 [https://newhampshire.libertyutilities.com/uploads/Rates%20and%20Tariffs/Electric%202020/20](https://newhampshire.libertyutilities.com/uploads/Rates%20and%20Tariffs/Electric%202020/2020-08-01%20GSE%20Tariff%20No.%202021.pdf)
17 [20-08-01%20GSE%20Tariff%20No.%202021.pdf](https://newhampshire.libertyutilities.com/uploads/Rates%20and%20Tariffs/Electric%202020/2020-08-01%20GSE%20Tariff%20No.%202021.pdf) under § 49:

18 "iv. Services Provided – One per Calendar Year with No Fee

19 1. Usage and Billing kW Data"

20 **Request No. EU to LGC 1-020** **Witness & Respondent: April Salas**

21 Page 16, line 11-13: Please explain why the authorization process to receive large customer data
22 was delayed if the customers had consented to sharing their data.

1 **RESPONSE:** This question should be directed to Liberty Utilities. Explicit approval was required
2 and obtained, which took upwards of six months, and then for reasons unknown to the Town of
3 Hanover, we experienced delays in receiving the requested/approved information.

4 **Request No. EU to LGC 1-021** **Witness & Respondent: April Salas**

5 Page 17, line 6-10: Please describe in detail the structure and format of the data received, the
6 inaccuracies present in the data, how the data “immediately began to degrade with time”, and why
7 no simple process exists to replicate this data acquisition effort.

8 **RESPONSE:** Data requested included 15-minute interval data, recorder/location ID, date, KW
9 and KVA. We requested this information for only the six largest electric customers in the town of
10 Hanover.

11 What was received just for the six largest users was a mix of Excel files with inconsistently
12 formatted rows and columns, as well as hourly data for some accounts and 15-min interval data
13 for others. When reviewing location/recorder ID numbers, we found overlapping dates/times
14 with differing KW and KVA data. Additionally, we had to undertake the tedious task of
15 combing through thousands of lines of data to parcel through recorder ID numbers and attach
16 them to ‘rate classes’ to derive meaningful information related to our community’s electric load.
17 For example, it should not be surprising that some entities have meters that fall within more than
18 one rate class, such as residential, small, medium, and large commercial: G3, G2, and G1, so this
19 data needs to be sorted. Moreover, the data that was received took nearly 6 months to receive,
20 about a month more to ‘process’, and it was all instantly out of date due to the fact that it is a
21 historical snapshot in time.

1 There is no system in place to automate the customer permissions (or revocation if it is to be
2 ongoing open-ended permission) and/or to provide updated data to the town on a continuing and
3 regular basis, much less to assure the consistent formatting and quality of the data or provide
4 permission-free aggregated data. The utilities need to ask themselves the question “why no
5 simple process exists to replicate this data acquisition effort?”

6 **Q.** Does this conclude your rebuttal testimony?

7 **A.** Yes, it does.