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STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

February 10, 2011 - 10:01 a.m.
Concord, New Hampshire

NHPUC MAR01'11 AM 9:45

RE: DE 10-326
GRANITE STATE ELECTRIC COMPANY
d/b/a NATIONAL GRID:
Tariff Filing Revising its
Outdoor Lighting Service.

PRESENT: Chairman Thomas B. Getz, Presiding

Sandy Deno, Clerk

APPEARANCES: Reptg. Granite State Electric Co.:
d/b/a National Grid:
Sarah B. Knowlton, Esq.

Reptg. the Town of Hanover:
Peter Kulbacki

Reptg. PUC Staff:
Suzanne G. Amidon, Esq.

Court Reporter: Steven E. Patnaude, LCR No. 52

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P R O C E E D I N G

CHAIRMAN GETZ: Okay. Good morning, everyone. We'll open the hearing in Docket DE 10-326. On December 10, 2010, National Grid filed a proposed tariff revision to its Outdoor Lighting Service Rate M, for effect with service rendered on and after January 1, 2011. Filing was made pursuant to RSA 9-E:4, which requires the establishment of requirements for electric utility rates for partial night use of outdoor lighting systems. We issued an order on January 7 suspending the tariff and scheduling the hearing for this morning.

I'll note for the record that there have been a number of public comments that have been filed, and they're in the docketbook and can be found on our website. And, I also note that the affidavit of publication has been submitted by the Company.

So, with that, appearances please.

MS. KNOWLTON: Good morning, Chairman. My name is Sarah Knowlton. I'm with the law firm of McLane, Graf, Raulerson & Middleton. I'm here today on behalf of Granite State Electric Company, which does business as National Grid. And, with me today from the Company is the Company's witness John Walter, and next to Mr. Walter is Ms. Lloyd, from the Company's Rates

{DE 10-326} {02-10-11}

1 Division.

2 CHAIRMAN GETZ: Good morning.

3 MS. AMIDON: Good morning, Mr. Chairman.
4 Suzanne Amidon, for Commission Staff, and with me today is
5 Al Azad Iqbal, an Analyst with the Electric Division.

6 CHAIRMAN GETZ: Okay. Good morning.

7 MS. AMIDON: And, just as a procedural
8 point, I don't -- Mr. -- Is it "Kulbacki"?

9 MR. KULBACKI: That's pretty good.

10 MS. AMIDON: -- with the Town of Hanover
11 is here. And, I know he has -- he may have some comments.
12 And, the Company has indicated that, if Mr. Kulbacki has
13 some questions, they're willing to have their witness
14 answer them as well. So, I just thought I would mention
15 that for your information.

16 CHAIRMAN GETZ: Okay. Thank you. Well,
17 are you ready to proceed?

18 MS. KNOWLTON: Yes. And, one more
19 procedural matter. I would like to request that the
20 Company's filing, which is the prefiled "Direct Testimony
21 of John E. Walter", be marked for identification as
22 "Exhibit 1".

23 CHAIRMAN GETZ: So marked.

24 (The document, as described, was

1 herewith marked as **Exhibit 1** for
2 identification.)

3 MS. KNOWLTON: And, I've provided
4 copies. It's the same document that was filed. It's just
5 Bates stamped, and it has "Exhibit 1" in the upper
6 right-hand corner. So, thank you. The Company calls John
7 Walter.

8 (Whereupon **John E. Walter** was duly sworn
9 and cautioned by the Court Reporter.)

10 **JOHN E. WALTER, SWORN**

11 **DIRECT EXAMINATION**

12 BY MS. KNOWLTON:

13 Q. Good morning, Mr. Walter.

14 A. Good morning.

15 Q. Would you please state your full name for the record.

16 A. John E Walter.

17 Q. By whom are you provided?

18 A. National Grid.

19 Q. What is your job with National Grid?

20 A. I'm the Manager Outdoor Lighting for the Company.

21 Q. How long have you held that position?

22 A. Approximately eleven years.

23 Q. And, would you give a general description of your job
24 duties?

1 A. My duties are that I am responsible for regulatory
2 strategy associated with outdoor lighting, the
3 implementation of the tariffs associated with that in
4 all our service territories, policies, procedures, and
5 the information systems that manage the inventory and
6 billing.

7 Q. Would you briefly describe your educational background?

8 A. I have a Bachelor's and a Master's in Engineering,
9 Civil Engineering, and an MBA from the University of
10 Buffalo.

11 Q. Thank you. Are you familiar with the document that's
12 been marked for identification as "Exhibit 1", which is
13 the prefiled direct testimony?

14 A. I am familiar with that.

15 Q. Was that prepared by you or under your direction?

16 A. It was.

17 Q. Do you have any corrections to that testimony?

18 A. I do. On the Seventh Revised Page 60, under "Other
19 Charges", there's a reference to --

20 Q. And, just one, actually, if I could slow you down one
21 minute, because we did give a Bates stamped copy. And,
22 I think that's Page 19 on the Bates stamped copy.

23 A. Okay. Thank you.

24 MS. KNOWLTON: I'm going to -- actually,

1 if I hand the witness the Bates stamped version.

2 **BY THE WITNESS:**

3 A. So, to begin again, Page 19 of the exhibit, under
4 "Other Charges", Seventh Revised Page 60, reference to
5 "RSA 9-D:4", should be "RSA 9-E:4". The situation was
6 that it was -- the legislation identified it as "D",
7 but, ultimately, the document was codified under the
8 Chapter 9-E.

9 BY MS. KNOWLTON:

10 Q. If I were to ask you today the questions that are
11 contained in your testimony, would the answers be the
12 same, subject to the correction that you just made?

13 A. They would.

14 MS. KNOWLTON: Thank you. I'll make the
15 witness available for cross-examination, unless the
16 Chairman would like me to conduct further examination of
17 him?

18 CHAIRMAN GETZ: No, I think that's fine.
19 Ms. Amidon.

20 MS. AMIDON: Yes. Thank you.

21 **CROSS-EXAMINATION**

22 BY MS. AMIDON:

23 Q. If I understand correctly -- good morning, by the way.

24 A. Good morning.

1 Q. This tariff was filed pursuant to legislation that was
2 passed here in the State of New Hampshire, is that
3 correct?

4 A. That is correct.

5 Q. And, could you briefly describe what -- how the Company
6 complies with that legislation with its tariff?

7 A. The basis of the legislation, as the Company took it,
8 was that it was an energy efficiency legislation,
9 looking for the partial operation of streetlights to
10 be, in effect, turned off at some portion of the night
11 to save the energy portion of the billing for the
12 energy saved. The only other element was to identify
13 and utilize certain luminaires that meets specific
14 criteria, and we're also adopting that. The generic
15 term is to use a "fully shielded" or "full cutoff"
16 luminaire.

17 Q. Thank you. And, I know that the Staff served some
18 discovery on the Company. And, one of the questions
19 was, it involved the charge the Company would make for
20 the service of coming out and changing over the light,
21 is that correct?

22 A. That's correct.

23 Q. And, as I understand it, in discovery, the Staff asked
24 "would this same charge", and I'm going to trust my

1 memory and say it was roughly \$150, "would that same
2 charge apply or could it be -- or could the service be
3 provided at less cost, with a scheduled -- on a
4 scheduled maintenance of the fixture?" Do you recall
5 that?

6 A. I do recall that.

7 Q. Okay. And, the Company -- could you tell us what the
8 Company's response was to that or the adjustment the
9 Company was willing to make regarding changing over the
10 lights on scheduled maintenance?

11 A. The situation would be that, as this service is above
12 and beyond the normal maintenance that's incorporated
13 with our current rates, if the customer desires the
14 application of this part-night device being installed
15 on an existing light, that would otherwise not require
16 the Company to partake in visiting that light, then we
17 would charge the -- what we were referring to as a
18 "service charge" of the \$150 as a flat rate charge per
19 light.

20 What the Company would like to propose
21 as part of the request of Staff was that, for those
22 lights where the Company will or has a request to go
23 and perform other routine maintenance, such as an
24 outage at that light, what we would propose is to just

1 charge the incremental cost of the device from what is
2 already out there to what this new device would incur.
3 The same would also be true for new installs that the
4 customer would desire, if they so elected to, from its
5 initiation, put in a part-night service, it would be
6 the full cost of that installation, plus just the
7 incremental charge for that.

8 Q. And, as I understand it, the Company is willing to
9 amend its tariff, assuming that the Commission approves
10 this filing, to reflect the changes that you just
11 mentioned, is that right?

12 A. That is correct.

13 Q. And, other than an outage, are there any other
14 scheduled maintenance where a customer could take
15 advantage of the lower costs of installation?

16 A. In a situation where the customer would have, as I
17 would phrase it, a "standing order" for all lights to
18 be changed to this Part-Night Option, for any cause
19 that the Company would go there for any other services
20 as part of our normal tariff, then we would perform
21 this for that incremental charge.

22 MS. AMIDON: Okay. That concludes our
23 cross-examination. Thank you.

24 CHAIRMAN GETZ: Thank you. Sir, did you

1 have any questions?

2 MR. KULBACKI: Yes. My name is Pete
3 Kulbacki. I'm with the Town of Hanover.

4 CHAIRMAN GETZ: It might be easier just
5 to speak into the microphone.

6 MR. KULBACKI: Sure. I have a letter I
7 wanted to give you a copy of. I've made extra copies.

8 MS. AMIDON: Why don't you give them to
9 me, I'll hand them out.

10 MR. KULBACKI: Sure.

11 CHAIRMAN GETZ: And, it's "Peter
12 Kulbacki"?

13 MR. KULBACKI: Yes, it is.

14 CHAIRMAN GETZ: I note that we have at
15 least one e-mail from a Lyn Swett Miller, who is the Chair
16 of the Sustainable Hanover Committee.

17 MR. KULBACKI: Yes.

18 CHAIRMAN GETZ: Is that affiliated --

19 MR. KULBACKI: She's a -- I'm a
20 recruited member of that committee as well.

21 CHAIRMAN GETZ: Okay.

22 MR. KULBACKI: This letter is from Julia
23 Griffin, and it really summarizes some of the concerns the
24 Town had. And, some have been addressed as well already.

1 One was the one you just talked about, incremental cost
2 charge, which is just doing extra work, which is something
3 we supported. We support the idea of the changeover, the
4 part-night technology is something that we think is a good
5 first step. What we'd like to see considered, one is how
6 the charge is made, the \$150 charge. In the original
7 tariff, I haven't seen any subsequent paperwork on that,
8 is that it's paid for during the next billing cycle.

9 The concern we have is that, if we were
10 to change our lights over, which we have a considerable
11 number of lights that we are considering changing over, we
12 would almost have to double our budget in a given year to
13 try to do that. And, if there's some way that could be
14 spread out over time, we have no problem with the rate,
15 but it's just how compact and how it affects our budget.
16 It represents about the wages of two employees. So, our
17 choice would be to lay a couple people off to change the
18 lights, but that's not something we would like to do.

19 And, we'd also like to see some pursuit
20 of some additional look at LED technology or some other
21 technology that can have some additional energy savings.
22 We did have some experience with some of our neighboring
23 communities in Vermont, where Green Mountain Power offers
24 LED lighting. Not sure of the fixtures or any details,

1 but they do have a tariff in the State of Vermont Public
2 Utilities Commission. So, they do have an ability to do
3 some other technology, and that's what -- we'd like to see
4 that considered either now or at some point in the near
5 future.

6 CHAIRMAN GETZ: Okay. Thank you. Well,
7 I have a few questions for Mr. Walter.

8 BY CHAIRMAN GETZ:

9 Q. I guess, one, following up on one of the points
10 Mr. Kulbacki has made, on Page 6 of your testimony says
11 that, on Line 2, "National Grid will process the
12 requests on an as-received basis." And, "work orders
13 will be created for each individual light specified for
14 an operation option change." So, do I take it from --
15 then, if I understand Mr. Kulbacki's concern, is they
16 don't want to do everything at once, they would like to
17 do some subset of lights, I guess, every year.

18 MR. KULBACKI: Ideally, we would like to
19 do them all at once, but we just don't have the budget to
20 do them all at once. That's the concern.

21 BY CHAIRMAN GETZ:

22 Q. So, I mean, that approach works under the tariff, is
23 that fair?

24 A. The situation there was -- that was represented in

1 testimony identified that, different than other
2 utilities have implemented, what we're looking to do
3 is, as requested by the municipality, we would then
4 write a specific order for the specific light to be
5 adjusted. Once that work order is then completed, our
6 billing system would automatically charge the fixed
7 unit price associated with that change, and that would
8 show up as an adjustment on their bill. It would
9 summarize, if we did multiple units, it would just
10 tally that service charge on the bill for them during
11 that bill period. So, it really is driven by the work
12 accomplished, which is different than the other
13 utilities, which actually charge it as a fee up front.
14 So, that's what we would do.

15 Q. Well, that's in the timing of the billing.

16 A. Right.

17 Q. But, I mean, it basically reacts to their selection of
18 which lights to be changed over and when?

19 A. That's correct.

20 Q. Okay. Let me try to make sure I understand a little
21 bit about the technology. So, a crew will go out to a
22 pole and install a new device. But is that a -- is it
23 a timing that's set for the whole year? I mean, how
24 does it react through the year between, you know, dusk

1 and dawn? Is it photosensitive? Is a computer chip
2 timed and --

3 A. It's actually -- I'm sorry, sir. It's actually both.
4 It's the photosensor identifies ambient daylight or
5 darkness, and it actually -- then the chip takes over
6 and does two things. It's both managing the control of
7 the light for that evening cycle, but also recognizes
8 the occurrence of what occurred the night before. So,
9 the operation of the device that we're proposing is
10 that it will turn on at dusk, it will operate until one
11 half of the dusk-to-dawn period measured the night
12 before, divides that in half, turns the light off at
13 that time. The light will remain off for five and a
14 half hours. And, if there is -- if the ambient light
15 level is still dark enough to cause the light to turn
16 on, in the morning hours, it will turn back on, until
17 such time as dawn occurs and the light will then turn
18 off.

19 The Company's position is that that
20 short amount of time in the early morning hours may be
21 helpful to the safety and well-being of the general
22 public in the winter months, when you could have school
23 children waiting at a bus stop or people going to work.

24 Q. And, you've said that, I guess with the -- "the

1 Company's...will notify customers the" -- I guess it's
2 on Page 5, Line 20, and following, that "municipal
3 account managers will notify municipal customers of the
4 availability of [this option]." Has that already
5 happened or that would happen after the tariff is
6 approved? What's the status of that?

7 A. The plan would be that, after the tariff is approved,
8 and specifically with the changes being proposed even
9 here today, with the incremental cost adjustment, all
10 of that would be incorporated, and then communications
11 initially written to the municipalities to identify
12 them all, and then a follow-up with the account
13 managers to those customers that have inquiries to
14 implement this.

15 Q. And, is this something that National Grid uses in other
16 jurisdictions, this approach?

17 A. It is not. This is the only service territory where we
18 offer the -- or plan to offer the Part-Night Option.

19 Q. What happens if -- is there the flexibility to do
20 something different in different towns, whether it's a
21 five and a half hour or no turn on before dawn? I
22 assume that gets pretty complicated?

23 A. It does get complicated. However, part of the creation
24 of the rate structure and the strategy that we

1 developed was to identify the burning hours for the
2 Part-Night Option, which in the tariff is defined as
3 "2,448 hours". That value incorporates a device that
4 we're proposing here today. In the event that there
5 would be another device or an option that a customer
6 would desire that would differ from the operating model
7 that I defined earlier, the potential would be that we
8 could provide that as a different device, but still
9 charge them under this flat rate of the 2,448 hours,
10 burning hours. The situation creates basically a
11 threshold for Part-Night Service, which is similar but
12 different to the threshold created for Dusk-to-Dawn
13 Service.

14 Q. And, I guess the reason I asked about other
15 jurisdictions and what contact has been made so far is
16 just the concern that, what if you get other options or
17 other requests, and how difficult that is and how
18 likely that is that variations on a theme will be
19 sought on a town-by-town basis?

20 A. You're correct that the requests by the customer base
21 will be great. Everybody wants what they want. So, it
22 creates almost a variable situation. The legislation
23 here in New Hampshire actually identified it as a
24 "Part-Night Option", and not a "Midnight Option",

1 midnight being 12 a.m. So, we were able to deal with
2 that. And, the complexity internally for the Company
3 managing different devices associated with that
4 variability to what the customer wants does create a
5 huge billing and stocking problem for the operation of
6 those lights going forward.

7 Q. So, this is your attempt at trying to balance the costs
8 to the customers and to the -- and to come up with an
9 option that seems to address the statute and what you
10 expect to be a reasonable effort to have the -- to
11 satisfy the dark sky concerns and the cost savings for
12 the Part-Night Option? Is that fair?

13 A. Yes, sir. Everything you've said is. It's the
14 blending and trying to balance all of that.

15 CHAIRMAN GETZ: Okay. Anything else?

16 MS. KNOWLTON: May I -- I want to, if I
17 may do very limited redirect of Mr. Walter. I would like
18 for him to address the issue raised by the Town of Hanover
19 regarding the availability of LED lighting, and why the
20 Company didn't include that offering in its proposed
21 tariff.

22 **REDIRECT EXAMINATION**

23 BY MS. KNOWLTON:

24 Q. So, if you could address that please, Mr. Walter.

1 A. National Grid is, of course, very aware of the new
2 technologies that are being proposed for outdoor
3 lighting. LEDs are the technology that is most
4 marketed. However, there are actually other
5 technologies that are being developed. So, we're
6 cognizant of all of those developments as they push
7 forward, and I'm sure the general public will be made
8 more aware of those in the near future.

9 The situation with LEDs specifically is
10 that the efficiency or lumens per watt is on par or
11 equal to the current high-intensity discharge
12 technology that the Company presently uses. Within
13 that high-intensity discharge technology, we have the
14 high-pressure sodium lamps, which provide the amber or
15 yellow light. And, then, there is, of course, mercury
16 vapor and metal halide are the other technologies
17 available in streetlighting.

18 So, from an efficiency standpoint,
19 they're equal, however, everybody views the LEDs as
20 being energy efficient. And, the issue is that the
21 marketing is such that, when an LED luminaire is
22 procured by a customer, the marketer will be selling
23 you one that produces less lumens, therefore using less
24 energy than what is currently in service today.

1 The situation, why people tend to like
2 the LED, it produces a white light, and the human eye
3 reacts better to white light for color recognition and
4 visual acuity. So, people will say they can see better
5 with the white light, even though the amount of lumin
6 output is less.

7 So, although slightly long-winded, and I
8 apologize for that, there is a sense of energy
9 efficiency gained, but the customer needs to recognize
10 they're getting less product, lumens, for the price.

11 Q. But can you explain why the Company didn't propose the
12 LEDs? Are there issues associated with that from the
13 Company's perspective?

14 A. So, in addition to the efficiency issue, from a
15 technology perspective, and the Company looks at things
16 in a very long time frame, as we would establish a rate
17 and a billing structure and to move forward. And, the
18 assets that we tend to put in the field we anticipate
19 to last for quite a long time, by which the rates then
20 capture those costs.

21 First of all, from a technology
22 standpoint, there are no industry standards. They're
23 being developed, but there are no industry standards
24 for manufacturers to make like kind products. Again,

1 as I mentioned before, there's multiple technologies in
2 the solid state arena; LED, OLED, and plasma. The LED
3 quality of the light-emitting diode itself varies.
4 And, there's issues associated with binning, which is
5 to group like kind light-emitting diodes, so that you
6 get the same light output in the technology or the
7 luminaire. You have driver technology that varies.
8 That's the electrical -- the electrical component that
9 makes the light operate.

10 Most significant to all of this is the
11 thermal management that is required within that. LEDs
12 generate an awful lot of heat that has to be expelled
13 from the luminaire. And, everybody has a different
14 process by which that occurs. That's a direct
15 relationship to the life that you can expect from a
16 luminaire.

17 Surge protection associated with solid
18 state technology on what is our distribution system,
19 which is -- tends to be somewhat of an older system.
20 Environmental issues associated with that solid state
21 technology being in an open environment, weather
22 conditions, and things such as insects and other
23 circumstances that occur out there, vibration.

24 And, the failure measurement for what

1 defines the failure of a luminaire, as is today, with
2 the HID technology, the lamp will fail and it will not
3 light. In LEDs, where you have multiple LEDs that
4 generate the light output, you can have some of those
5 individual LEDs fail and still creating light output.
6 There's no way to really determine or measure what
7 achieves that light depreciation at the level which the
8 industry recognizes as failure.

9 There's unknowns in life. Everything
10 that's been defined by the marketers today is
11 analytical. They're extrapolations of escalated in
12 situ or in-service testing within a laboratory, and
13 then they extrapolate them out to 100,000 hours or
14 more. So, all of those conditions create an aspect of
15 uncertainty for the utility in adopting that
16 technology.

17 Then, we would roll into the issue of
18 cost. The cost of the technology is somewhere on the
19 order of four to ten times what we currently pay for
20 the existing technology. So, from a facility
21 perspective, we would anticipate our rates greatly
22 increasing to capture that facility charge. This is
23 even considering the potential for reduced maintenance,
24 because you still have a bell curve associated with

1 premature failures and other types of conditions.

2 The other element to all of this is
3 that, where the current technology is very stable, this
4 technology turns over approximately every 18 months.
5 So, the energy efficiency, the technology of the
6 luminaires, everything that goes into the new LED
7 luminaires will actually change significantly, such
8 that we would be forced to re-evaluate and re-file on
9 about an 18-month or 24-month period just to keep in
10 step.

11 In general, a regulated, analytical rate
12 model that we presently have for the current technology
13 is unsustainable in its application for the new
14 technology. So, as much as we keep an eye on the
15 technology and hope for some stabilization of that,
16 we're also looking at the rate structure model that we
17 want to use to move forward.

18 So, in addition to the technology
19 element, we also recognize what's happening within the
20 industry associated with the hours of operation.
21 That's what this new tariff offering is for the
22 Part-Night. And, the new LED or solid state lighting
23 technology offers the potential for dimming, similar to
24 what you would experience in your home. So, you end up

1 with three variables, when it comes to ratemaking, both
2 in product, hours of operation, and then the dimming
3 capability, and it doesn't really allow for an
4 analytical rate model that we currently use.

5 MS. KNOWLTON: I have nothing further
6 for Mr. Walter.

7 CHAIRMAN GETZ: Thank you. Anything
8 further for Mr. Walter?

9 MS. AMIDON: No.

10 CHAIRMAN GETZ: Then, hearing nothing,
11 you're excused. Thank you.

12 WITNESS WALTER: Thank you.

13 CHAIRMAN GETZ: Is there any objection
14 to striking the identification and admitting the exhibit
15 into evidence?

16 (No verbal response)

17 CHAIRMAN GETZ: Hearing no objection, it
18 will be admitted into evidence. We'll give an opportunity
19 for closing statements. I'll start with you,
20 Mr. Kulbacki. You've now had the opportunity to read
21 Ms. Griffin's letter with the specific request. But, if
22 there's anything else you'd like to say, this would be
23 your opportunity?

24 MR. KULBACKI: I really -- I covered the

1 substance, really, summarized it, and our desire to
2 continue to look at LED. We are doing LED in our
3 lighting. We have Energy -- a grant from Office of Energy
4 & Planning for the State of New Hampshire to replace our
5 streetlights on Main Street with LED, to change from
6 high-pressure sodium. We are also changing bridge lights
7 as well. We have -- we have neighboring communities in
8 Vermont who have LEDs, and it's offered through a tariff
9 to -- at Green Mountain Power, so there is other tariffs
10 out there that meet some standards. I'm not sure exactly
11 what they use for lighting, but they do have a tariff and
12 the ability to have LED installed. And, the current \$150
13 charge, if it's charged at the time of service, we won't
14 be able to afford to make use of this, that Part-Night,
15 because of the upfront costs. And, that's a big concern
16 of ours. And, we really want to use it, but having an
17 upfront cost that almost doubles our streetlight budget
18 for one year is not something we can do.

19 CHAIRMAN GETZ: What does Hanover do
20 with respect to its own streetlighting, in terms of
21 part-night options?

22 MR. KULBACKI: We don't have part-night
23 yet. I'm sure it will be requested as we get into these a
24 little bit more. Our first step was to try to look at the

1 LED technology, because we have a number of people working
2 in the surrounding communities who have seen them used in
3 streetlights and other areas. So, that was our first
4 step. And, we will be looking at the Part-Night, because
5 it's something we welcome. It's just that the upfront
6 cost of changing all the ones we'd like to change is out
7 of our -- really out of what we can afford at this point.
8 If it were spread over time, then we would jump at the
9 opportunity.

10 CHAIRMAN GETZ: Thank you. Ms. Amidon.

11 MS. AMIDON: Thank you. Staff has
12 reviewed the filing. And, with the change that we
13 referred to in my examination of Mr. Walter regarding the
14 incremental cost for installing the device where it's
15 associated with other maintenance or work on the fixture,
16 we support the filing of the Company and look forward to
17 seeing the revised tariff, assuming the Commission grants
18 its approval to the filing.

19 CHAIRMAN GETZ: Thank you.

20 Ms. Knowlton.

21 MS. KNOWLTON: Thank you. As Mr. Walter
22 indicated, the Company is agreeable to include in a final
23 compliance tariff the incremental change that he described
24 in his testimony.

1 As a general matter, the Company
2 believes that the tariff that it has submitted, subject to
3 that one change with regard to the incremental cost, when
4 it's already going out into the field and servicing a
5 particular light to install a part-night device on a light
6 for the incremental cost is -- the tariff would be just
7 and reasonable. The price under the tariff is adequately
8 explained in Mr. Walter's testimony. And, I think is in
9 the general ballpark of the types of charges that are
10 charged by other utilities. The Town's letter refers to
11 the tariffed rate of Public Service of New Hampshire,
12 which is \$163 per streetlight; the Company here is
13 proposing 150.

14 So, I think, overall, the rate is just
15 and reasonable. And, I think the tariff, as it's
16 proposed, complies with the dictates of the statute. And,
17 we would ask that, subject to the one change described by
18 Mr. Walter, that it be approved.

19 CHAIRMAN GETZ: All right. Thank you.
20 Then, we'll close the hearing and take the matter under
21 advisement.

22 **(Whereupon the hearing ended at 10:34**
23 **a.m.)**