



Michael J. Sheehan, Esq.  
Senior Counsel

Phone: 603-724-2135

Email: Michael.Sheehan@libertyutilities.com

NHPUC 12MAR'19PM4:16

March 12, 2019

***Via Hand-Delivery and Electronic Mail***

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 16-383; Liberty Utilities (Granite State Electric) Corp.  
Request for Change in Rates**

Dear Ms. Howland:

Enclosed for filing please find the Direct Testimony and Attachments of Heather M. Tebbetts and Anthony Strabone in support of Liberty Utilities (Granite State Electric) Corp.'s distribution rate adjustment for rates effective May 1, 2019. This rate adjustment was authorized by Section II B (step adjustment) of the Settlement Agreement in Docket No. DE 16-383, as approved in Order No. 26,005 (Apr. 12, 2017). As shown on Attachment A to the Tebbetts/Strabone testimony, the net result is a 0.44% adjustment to distribution rates effective May 1, 2019.

In addition, Section II G of the Settlement Agreement includes a three-step annual phase-out of the blocked rate design on Domestic Service Rate D, the third step of which is to occur May 1, 2019. This adjustment to distribution rates is described in the Technical Statement of David B. Simek.

For administrative efficiency, tariff pages to implement the distribution rate adjustment and rate design change described above will be filed with the Company's Reliability Enhancement Plan and Vegetation Management Plan Report (REP/VMP) filing that is due by March 15, as that filing will also include changes to distribution rates, with the impacts derived from the adjustments in this proceeding included.

To the extent Puc 1603.05 requires the filing of the new tariff pages reflecting the changes discussed above now, rather than with the REP/VMP filing that will be made in a few days as proposed, the Company respectfully requests a waiver of that requirement pursuant to Puc 201.05. A waiver is appropriate if the Commission finds that it "serves the public interest" and "will not disrupt the orderly and efficient resolution of matters before the commission." Puc 201.05(a). Puc 201.05(b)(2) states that the commission "shall" waive a rule if the "purpose of the rule would be satisfied by an alternative method proposed." The Company's proposal to file the tariff pages a single time with the REP/VMP plan is an alternative method that will

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satisfy the purpose of the rule. Therefore, the Company asks that the Commission allow a single filing of proposed tariff pages with the REP/VMP filing on March 15.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Sheehan", with a stylized, cursive script.

Michael J. Sheehan

Enclosures  
cc: Service List