



Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities

DE 16-383  
Distribution Service Rate Case

Staff Data Requests - Set 1

Date Request Received: 5/27/16  
Request No. Staff 1-9

Date of Response: 6/3/16  
Respondent: Christian Brouillard

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**REQUEST:**

Re: Simpson at 9-10, Chart 1; Mr. Simpson provides a graphical representation of Liberty's historical plant additions since 1997. The spike depicted for 2013 through 2014 is significantly out of trend and appears to indicate a critical need in terms of capital improvements. Is this a correct interpretation of the graph? Did Liberty acquire significant deferred maintenance and/or investment involving Granite State's existing infrastructure at the time of acquisition from National Grid?

**RESPONSE:**

The referenced chart depicts historical capacity-related plant additions. Granite State's capacity-related plant additions did increase, as compared to historical levels, during the 2013-2014 time periods. The increases were predominantly driven by completion of work to address legacy National Grid (NG) reliability underperformance and capacity limitations. The increases in Liberty's investments include certain legacy projects, previously identified by NG, but completed by Liberty, to address system underperformance/capacity limitations:

- Michael Avenue substation and distribution in Charlestown;
- Enfield second supply line;
- Hanover 6L2 direct buried getaway cable replacement;
- bare conductor replacement; and
- initiatives to address pockets of poor performance, low voltage, and other underperforming areas and equipment.