

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 19-064

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Distribution Service Rate Case

Request to Revise Street Lighting Tariff

**TECHNICAL STATEMENT OF
HEATHER M. TEBBETTS**

May 14, 2021



1 **I. Purpose of Technical Statement**

2 On June 30, 2020, Liberty Utilities (Granite State Electric) Corp. (“Liberty” or “the
3 Company”) received Order No. 26.376 in this docket approving a settlement agreement
4 that covered a wide range of issues, including support of Liberty’s revised Rate M and
5 new LED lighting tariffs. This technical statement provides an overview of minor
6 clarifications the Company would like to make with regard to private area (non-
7 municipal) lighting replacements.

8 **II. Private Area Lighting Replacements**

9 The Company’s tariff¹ provides that customers looking to convert from traditional street
10 lighting such as High Pressure Sodium (“HPS”) to LED street lighting for lights that are
11 still operational do so with the incurrence of certain fees. The requirements for
12 conversion include paying the undepreciated value of the fixture and a \$50 fee to send a
13 Troubleshooter to the location to replace the fixture. There are no fee requirements for
14 customers whose lights have failed and need to be replaced. The Company replaces such
15 failed fixtures at no charge.

¹ Public, Private, Street, or Outdoor Lights

Conversion of lights will be made as requested by the Customer and as agreed to by the Company, upon payment of the undepreciated value of the existing light and a \$50 per light conversion charge or in accordance with Rates LED- 1 or LED-2. To determine the undepreciated value, the Company will review the install date of the fixture(s) at the Customer’s location. If the install date is greater than 23 years from the date of conversion, the undepreciated value will be zero. For fixtures that are not fully depreciated at the time of conversion, the Company will use the 2020 install cost adjusted for inflation to develop an approximate historical cost and depreciate the fixtures using straight line depreciation. The Customer will be responsible for the remaining undepreciated value.

1 In the event that a customer has a fixture billed under Rate M installed at their premises
2 that fails to burn and replacement of the bulb and/or photocell does not fix the issue, the
3 Company is now proposing tariff language that will allow the Company to replace that
4 fixture with a comparable LED fixture under Rate LED-1 without charging the customer
5 the \$50 or undepreciated value, essentially continuing the practice of replacing the fixture
6 after it has failed without charging fees.

7 **III. Current Private Area Light Replacement Process**

8 When a customer reports their private area light is no longer turning on, the Company
9 sends a troubleshooter to the location to inspect the fixture. If replacement of the bulb
10 and/or photocell does not repair the fixture, the Troubleshooter will inform the customer
11 that they can replace the fixture with another HPS fixture, for example, or the customer
12 can convert to LED. If, in this example, the customer chooses to stay with HPS, there
13 may be a period of time before the fixture is replaced as General Electric is no longer
14 making these fixtures, and purchasing them from another vendor, Cooper, is possible, but
15 still difficult and would involve a significant delay. If a customer has a mercury vapor
16 fixture, they must choose another type of fixture as mercury vapor ballasts have been
17 banned since 2008.²

18 Troubleshooters do not carry HPS fixtures on their trucks due to the lack of available
19 inventory so they will ask the customer if they want to replace with an LED or HPS
20 fixture. If the customer wants a HPS, the troubleshooter will return to the work center and

² <https://www.govinfo.gov/content/pkg/PLAW-110publ414/pdf/PLAW-110publ414.pdf>

1 search the inventory and, if none are available, the Operations Coordinators will request a
2 purchase of the needed fixture and replacement will occur once the fixture is received.

3 If the customer agrees to have an LED fixture installed, under the current tariff language
4 the troubleshooter must leave the property and notify the Operations Coordinator that the
5 customer still does not have an operational light but wants the replacement to be an LED.
6 In the absence of the proposed tariff language addressing a situation where one type of
7 inoperable fixture is replaced with an LED fixture, then the situation is treated similar to
8 a conversion. That is, the Operations Coordinator contacts the customer to explain that
9 there is a \$50 charge and the undepreciated value of the currently installed fixture needs
10 to be paid prior to the replacement being installed. In the meantime, the customer still has
11 no lighting. Either way, the customer has to wait for the light to be replaced and the
12 customer who says they would like LED fixture is treated differently with respect to the
13 incurrence of charges than the customer who merely wants another HPS fixture installed.

14 **IV. Request to Commission**

15 The Company is proposing that in the event that the Troubleshooter cannot fix the non-
16 LED fixture, the Company can replace the fixture with an LED of like-in-kind wattage,
17 without charging the \$50 fee or the undepreciated value, essentially treating this customer
18 the same as one who requests HPS replacement, as in the example above. Such a change
19 would allow the fixture to be replaced immediately and avoids the troubleshooter having
20 to make a second trip. Given that LED lights are readily available, troubleshooters are
21 able to keep a small inventory with them at all times. The customer will also have a

1 lower bill given that the fixed prices in Rate LED-1 are lower and the fixtures use less
2 kWh than the HPS. The Company estimates that fewer than ten of these issues arise
3 annually and, as such, having this minor clarification in the tariff will provide lower costs
4 to the Company and the customer and will allow for a more efficient replacement
5 process. The proposed language changes to the tariff pages are provided in Attachment
6 14, given that Attachments 1 through 13 were filed in the Company's Step Adjustment
7 filing in this docket on April 6, 2021.

8 **V. Undepreciated Value Concerns**

9 In the past, when fixtures failed and they were replaced with the same type of fixture, the
10 customer was not responsible for any undepreciated value or a \$50 fee to replace. The
11 Company is looking to treat the replacement of HPS and mercury vapor with LED
12 fixtures in the same manner, whereby the old fixture is retired and an entry is made to
13 credit the plant asset account and debit accumulated depreciation. This treatment is the
14 same given to any other failed asset, such as a transformer.

15 **VI. Conclusion**

16 The Company asks that the Commission approve the tariff language submitted in
17 Attachment 14 in conjunction with the Company's request for July 1, 2021, rates in this
18 docket.