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September 8, 2021

***Via Electronic Mail Only***

Dianne Martin, Chairwoman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

**Re: Docket No. DE19-064; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty  
Notice of Intent to File Rate Schedules**

Dear Chairwoman Martin:

In Order No. 26,512 (Aug. 29, 2021), the Commission ordered "that Liberty shall submit its current tariff provisions dealing with customer requests to place services underground within 10 days of this order." Order at 8.

On behalf of Liberty Utilities (Granite State Electric) Corp., and in compliance with Order No 26,512, enclosed please find the excerpts from Liberty's current tariff that require customers to pay the incremental cost of placing facilities underground that the Company would otherwise have installed above ground.

Section 12 of the Tariff's "Terms and Conditions" provides the general statement of customer responsibility for the costs to place services underground, as part of the Tariff's line extension provisions:

## I 2. Underground Service

Prior to January 1, 2019, a Customer's premises may be connected to the Company's aerial distribution wires through an underground connection where the Customer installs, owns and maintains all of the underground service including the necessary riser. All underground service connected to the Company's underground distribution cables beyond two feet inside the property line shall be installed by the Customer and shall be and remain the property of the Customer.

For installations after January 1, 2019, a Customer's premises may be connected to the Company's aerial distribution wires through an underground connection as provided for in Policies 1 through 4.

Tariff at Original Page 11 (Attachment at Bates 002). Policies 1 through 4 appear in the Tariff at Original Page 57 through Original Page 75 (Attachment at Bates 004 through 022). Those provisions provide the details for how customers are charged to place facilities underground.

Also attached is Section 27 of the Tariff's "Terms and Conditions," which governs how the Company will respond to requests to relocate its existing facilities:

### 27. Relocation of Company-Owned Equipment

Subsequent changes in the location of Company-owned facilities on private property will in general be made by the Company at the Customer's expense. Line Extension Policy 3 – Individual C&I Customer provides direction for the calculation of the Customer's expense associated with relocation of Company-owned equipment.

The Company, however, will assume the expense of the relocation if the following conditions exist:

- a) The relocation is for the Company's convenience, or
- b) The relocation is necessary owing to the expansion of the Customer's operations and the expense is justified by the increased annual revenue.

Dianne Martin, Chairwoman

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The preceding should not be construed to apply to a situation where the existing location is adequate to handle the expanded operations or where the relocation is requested solely for the Customer's convenience. In any such instance the relocation will be at the Customer's expense even though increased revenue will result from the expanded operations.

Tariff at Original Page 16 (Attachment at Bates 003).

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan

Cc: Service List  
Enclosures