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Via Electronic Report Filing

Daniel Goldner
Chairman
New Hampshire Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301-2429

Dear Chairman Goldner:

Re: Docket No. DE 17-189/ Petition to Approve Battery Storage Pilot Program
Tariff Pages: 13th rev pg 125; 14th rev pg 126
Effective Date: November 1, 2022

Docket No. DE 19-064/ Distribution Service Rate Case
Tariff Pages: 13th rev pg 123; 15th rev pg 127
Effective Date: November 1, 2022

Docket No. DE 20-170/ Electric Vehicle Time of Use Rates
Tariff Pages: 15th rev pg 127; 2nd rev pg 128, 129, 133
Effective Date: November 1, 2022

In its Letter of Non-Compliance dated December 7, 2022, and Procedural Order issued in Docket No. DE 22-024 on February 17, 2023, the Commission directed the Company to refile the tariff pages for the above-mentioned dockets in a manner sufficient for the Commission to determine whether they comply with the relevant orders; enclosed with this letter are the requested tariff pages.

In the same letter, the Commission directed the Company to file technical statements explaining the methodology supporting the tariff calculations in the corresponding dockets. Please see the attached Technical Statement of Erica L. Menard describing the methodology for calculating the TOU rates for tariff pages 123, 125, 126, and 127 for rates D-11 and Rate EV D-10 and tariff pages 127, 128, 129, and 133 for EV-L and EV-M rates. The Company is also providing live, confidential Excel models supporting the TOU rate calculations. The models are complicated in nature and therefore, the Company would be open to an in-person, Commission-attended technical session to review the models in Excel form, if desired. This session will afford the



Commission an opportunity to understand the basics of the model and the changes to data inputs made since the models were initially approved.

Liberty is filing the DE 17-189 TOU model in confidential version only. The key author of the model, Lon Huber, formerly of Strategen Consulting, expressly insisted on confidential treatment of his proprietary work, authorizing only the parties to DE 17-189 to use the model for adjusting the TOU rates going forward. Liberty thus asserts confidentiality pursuant to RSA 91-A:5, IV, which excludes "confidential, commercial, or financial information" from the law's requirement to allow access to government records.

Thank you for your attention to this matter. Please do not hesitate to call if you have any questions.

Sincerely,

Erica L. Menard

Enclosures

Cc: Service List