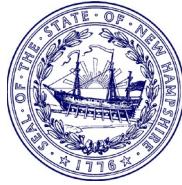


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May 15, 2023

Michael J. Sheehan
Director, Legal Services
Liberty Utilities
116 N. Main Street
Concord, NH 03301

Re: Docket No. DE 20-170
Electric Vehicle Time of Use Rates
Tariff Pages: Original pgs 128, 133
Effective Date: July 10, 2023

Tariff Pages: 15th rev pg 127; 2nd rev pgs 128, 133
Effective Date: November 1, 2023

Docket No. DE 22-035
Request for Step Adjustment
Tariffs Pages: 1st rev pgs 128, 133
Effective Date: August 1, 2022

Filings received: April 13, 2023

Docket No. DE 23-006
Request for Storm Recovery Adjustment Factor Refund
Tariff Pages: 8th rev pgs 90, 91, 92, 93, 96; 7th rev pg 99; 8th rev pgs 101, 104, 107, 108; 7th rev pgs 114, 121; 15th rev pgs 123, 125; 17th rev pg 126; 18th rev pg 127; 4th rev pgs 129, 133
Effective Date: March 1, 2023
Filing received: April 14, 2023

Dear Attorney Sheehan:

Employees of the New Hampshire Public Utilities Commission have reviewed these filings in view of the correction Liberty Utilities (Liberty) made regarding an erroneous addition of the fixed customer charge to calculate Rate G-1 and Rate G-2 revenues. While Liberty appropriately addressed this error, Commission staff members are unable to validate the ultimate rates in each of these filings from the Excel models Liberty provided.

In the tariff filing in Docket No. DE 22-035, with an effective date of August 1, 2022, Liberty provided updated EV-L and EV-M rate design models. However, when tracing the source information for the input in the “Liberty Distribution Revenues” tab for either of the Excel models, staff members were unable to fully validate the current rates for the G-1 and G-2 classes that Liberty used to calculate the rates on Pages 128 and 133. It is also unclear why the new rates on Page 128 in Docket No. DE 22-035 are the exact same as the Original Page 128 that was issued on July 6, 2022 under Docket No. DE 20-170, whereas the latter was further updated on April 13, 2023 to reflect the latest error corrections.

In the tariff filings in Docket No. DE 20-170, with effective dates of July 10, 2022 and November 1, 2022, respectively, Liberty did not provide EV-L and EV-M rate design models that would help trace the updated rates. Accordingly, Commission staff members were unable to verify the rates in these tariff filings and would benefit from an explanation of the changes and how they mapped over time.

In light of the above, the Commission requests that Liberty provide the following additional material:

- In Docket No. DE 22-035: (i) a summary table correctly linking and sourcing the input for the G-1 and G-2 revenues used in the associated EV-L and EV-M models; and (ii) a written explanation that points to the exact tab/row/column to refer to in the source spreadsheets.
- In Docket No. DE 20-170, for both the July 10, 2022 and November 1, 2022 filings; (i) associated EV-L and EV-M rate design models; (ii) summary tables linking and sourcing the input for the G-1 and G-2 revenues used in the EV-L and EV-M models; and (iii) a written explanation that points to the exact tab/row/column to refer to in the source spreadsheets.
- A list of any other dockets that may be affected by the original correction, which Commission staff understand includes the tariff filing in Docket No. DE 23-006 (effective date March 1, 2023). For each affected docket, Liberty should file the associated models to support the rate change with sufficient information for the Commission to validate the rate changes.

The Commission requests that Liberty file all associated models in one filing, with an overarching cover letter summarizing and mapping each change to facilitate the Commission’s review. In the event that the filings remain unclear, the Commission may request another technical session in order to understand the flow of these latest changes.

In accordance with the Secretarial letter issued March 17, 2020, this letter will be filed electronically only at this time. Please contact me at (603) 271-6044 or e-mail me at tariffs@puc.nh.gov if I can be of future assistance.

Sincerely,

/s/ *Ben Martin-McDonough*

Ben Martin-McDonough
Tariff Administrator

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