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May 1, 2024

Via Electronic Mail Only

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

Re: Docket No. DE 20-170; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Electric Vehicle Time of Use Rates – Compliance Tariff

Docket No. DE 19-064; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Notice of Intent to File Rate Schedules – Compliance Tariff

Docket No. DE 17-189; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Electric Petition to Approve Battery Storage Pilot Program – Compliance Tariff

Dear Chairman Goldner:

Attached for filing in the above dockets please find the following updated tariff pages implementing the seasonal adjustments to the Company's EV rates D-11, D-12, EV-L, and EV-M:

- Twenty-fourth Revised Page 123
- Twenty-fourth Revised Page 125
- Twenty-seventh Revised Page 126
- Twenty-sixth Revised Page 127
- Ninth Revised Page 128
- Thirteenth Revised Page 129
- Thirteenth Revised page 133

In its November 1, 2023 seasonal update filing, the Company noted that it had discovered an error in the model that was created by a consultant to then Commission Staff and approved by the Commission in Order No. 26,604 and that is used to update Rates EV-L and EV-M. (The separate model that calculates the residential EV rates, D-11 and D-12, does not suffer from the same error.) Based on Liberty's representations, the November 1, 2023 filing was deemed non-compliant through a letter issued December 4, 2023. The Company's initial efforts to schedule a discussion with Department of Energy were unsuccessful, and the matter was subsequently dropped under the weight of more pressing matters.

The updated rates filed herein reflect the Company's efforts to correct three aspects of the models, which the Company believes are inconsistent with Order 26, 604 in Docket 20-170 and its tariff. First, the EV-L and EV-M rates are to be revenue neutral to the corresponding rate class, or G-1 (for EV-L), or G-2 (for EV-M). See Order 26,604 at p. 22. However, revenue neutrality cannot be maintained by updating the revenue requirements in the corresponding models for such service without also updating the billing determinants. Therefore, the models were updated using the G-1 and G-2 billing determinants used in the July 1, 2023, temporary rate increases approved in Docket 23-039. This correction places slight upward pressure on EV-L rates, as most recent billing determinants decreased, while there is downward pressure on EV-M rates, as the billing determinants increased.

Second, the approved Settlement Agreement in Docket No. DE 20-170 established demand charge at half of the G-1 and G-2 demand charge, leaving the other half of the kW revenue requirement to be recovered through kWh charges. See Order 26,604 at p. 22. This was not reflected in the models, which were hardwired to recover full kW and kWh revenue requirements of corresponding class through kWh distribution charges. The correction of this issue results in material decreases in both EV-L and EV-M distribution rates.

The third error in the models was discovered well after the November 1, 2023 filing, in preparation for discussions with the Department of Energy in late December 2023. The Company discovered that the model employs definitions of peak, mid peak and off-peak periods that are inconsistent with the Company's EV-L and EV-M tariffs, specifically with respect to which TOU rates are applicable during holidays and weekends. The corrections to the models using periods as defined in the tariff causes cost shifting, primarily between off-peak to mid-peak rates.

The results of these updates to the EV-L and EV-M models, as well as the update of D-11 and D-12 rates, are reflected in the tables below:

Table 1
EV-L Commercial EV TOU Charging Rate
Summer Period

	Energy Service (\$/kWh)	Transmission (\$/kWh)	Distribution (\$/kWh)	Total (\$/kWh)
Critical Peak	\$0.34582	\$0.15807	\$0.02046	\$0.52436
Mid Peak	\$0.08489	\$0.01168	\$0.01959	\$0.11616
Off Peak	\$0.06344	(\$0.00294)	\$0.01309	\$0.07360

Table 2
EV-M Commercial EV TOU Charging Rate
Summer Period

	Energy Service (\$/kWh)	Transmission (\$/kWh)	Distribution (\$/kWh)	Total (\$/kWh)
Critical Peak	\$0.34439	\$0.14374	\$0.02642	\$0.51454

Mid Peak	\$0.08317	\$0.00956	\$0.02375	\$0.11648
Off Peak	\$0.06198	(\$0.00294)	\$0.01987	\$0.07891

Table 3
D-11: Battery Storage/D-12: Residential EV TOU Charging Rate
Summer Period

	Energy Service	Transmission	Distribution	Total
	(\$/kWh)	(\$/kWh)	(\$/kWh)	(\$/kWh)
Critical Peak	\$0.08343	\$0.19940	\$0.12123	\$0.40406
Mid Peak	\$0.06583	\$0.00760	\$0.06689	\$0.14033
Off Peak	\$0.05078	(\$0.00294)	\$0.04546	\$0.09329

Note that there are no customers taking service under Rates EV-L or EV-M, thus these errors have had no impact on any customers.

Thank you.

Sincerely,



Michael J. Sheehan

Enclosures
cc: Service List