

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

Docket No. DG 20-170 Electric Vehicle Time of Use Rates
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

**TESTIMONY
OF
HEATHER TEBBETTS
AND
MELISSA SAMENFELD**

June 15, 2021



1 **I. INTRODUCTION AND BACKGROUND**

2 **Q. Ms. Tebbetts, please state your full name, business address, and position.**

3 A. My name is Heather M. Tebbetts and my business address is 15 Buttrick Road,
4 Londonderry, New Hampshire. I am Manager of Rates and Regulatory Affairs for
5 Liberty Utilities Service Corp. (“LUSC”) and am responsible for providing rate-related
6 services for Liberty Utilities (EnergyNorth Natural Gas) Corp. (“EnergyNorth”) and
7 Liberty Utilities (Granite State Electric) Corp. (“Granite State”), (collectively “Liberty”
8 or “the Companies”).

9 **Q. Please describe your educational background and training.**

10 A. I graduated from Franklin Pierce University in 2004 with a Bachelor of Science degree in
11 Finance. I received a Master of Business Administration from Southern New Hampshire
12 University in 2007.

13 **Q. Please describe your professional background.**

14 A. I joined LUSC in October 2014. Prior to my employment at LUSC, I was employed by
15 Public Service Company of New Hampshire (“PSNH”) as a Senior Analyst in NH
16 Revenue Requirements from 2010 to 2014. Prior to my position in NH Revenue
17 Requirements, I was a Staff Accountant in PSNH’s Property Tax group from 2007 to
18 2010 and a Customer Service Representative III in PSNH’s Customer Service
19 Department from 2004 to 2007.

20 **Q. Have you previously testified before the Commission?**

21 A. Yes, I have testified on numerous occasions before the Commission.

1 **Q. Ms. Samenfeld, please state your full name, business address, and position.**

2 A. My name is Melissa B. Samenfeld and my business address is 15 Buttrick Road,
3 Londonderry, New Hampshire. I am a Rates Analyst II in the Rates and Regulatory
4 Affairs department for LUSC and am responsible for providing rate-related services for
5 EnergyNorth and Granite State.

6 **Q. Please describe your educational background and training.**

7 A. I graduated from Southern New Hampshire University in 2014 with a with a Bachelor of
8 Science degree in Business Administration, with a concentration in Organizational
9 Leadership.

10 **Q. Please describe your professional background.**

11 A. I joined LUSC in December 2016. Prior to my current position, I was employed by
12 LUSC as an Electric Service Representative from 2017 to 2019, and an Electric
13 Operations Coordinator from 2016 to 2017. Prior to my employment at LUSC, I was
14 employed by PSNH as a Utility Worker from 2012 to 2016, a Representative A from
15 2007 to 2012, and a Customer Service Representative III in the Credit and Collections
16 Department from 2001 to 2007.

17 **Q. Have you previously testified before the Commission?**

18 A. No, I have not.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. What is the purpose or your testimony?**

3 A. In Docket No. IR 20-004, Staff recommended the Commission open a new proceeding
4 and direct each electric utility to file (1) an electric vehicle (“EV”) time-of-use (“TOU”)
5 rate proposal for separately-metered residential and small commercial customer
6 applications, and (2) an EV TOU rate proposal for separately-metered high demand draw
7 commercial customer applications that may incorporate direct current fast charging or
8 clustered level two chargers. Staff recommended that each proposal should be
9 accompanied by testimony explaining how those rates were developed, any plans for
10 marketing residential EV TOU rates, and how the rate is consistent with the
11 Commission’s appropriateness determinations herein.

12 Granite State already has an electric vehicle charging rate for residential customers.

13 Therefore, this testimony will focus on small commercial applications and high demand
14 draw commercial applications.

15 **III. SEPARATELY-METERED COMMERCIAL APPLICATIONS**

16 **Q. Please explain the rates the Company is proposing for commercial electric vehicle
17 charging station customers.**

18 A. The Company is proposing two rates, depending on the demand. The first is Rate EV-L
19 for demand 200 kW and greater. The second is Rate EV-M for demands 20 kW to 200
20 kW. Each rate is in line with the Company’s current commercial and industrial rates G-1
21 and G-2, respectively. The Company is not proposing residential TOU electric vehicles
22 rates because it already has such a rate as approved in Docket No. DE 19-064.

1 **Q. How did the Company calculate the rates?**

2 A. The calculation of the rates started with reviewing the revenue requirement currently
3 approved for rates G-1 and G-2 in Docket No. DE 19-064. Both rates have customer,
4 demand, and volumetric charges. The design of these existing rates is such that the
5 demand charges recover the majority of the costs of serving customers in these rate
6 classes, rather than the volumetric charges. To accommodate the fact that electrification
7 of transportation is here to stay, thus providing consistency to the volumetric charges, the
8 rates calculated for Rate EV-L and EV-M provide for the majority of the revenue
9 requirement of Rates G-1 and G-2 to be heavily weighted on the volumetric kWh charge
10 as shown in Attachment 1. The revenue requirement for both rates provides for 85% to
11 volumetric kWh, 5% to the customer charge, and 10% to the demand charge. By making
12 this change, the cost to the customer owning the stations on their monthly bill will be
13 significantly less.

14 **Q. Please explain the differences in the service requirements of each rate.**

15 A. Rate EV-M provides for service for installations of 72 kW or less. This aligns with single
16 phase service requirements in the Company's Specifications for Electrical Standards.
17 Rate EV-L provides for installations greater than 72 kW to align with three phase service
18 requirements in the Company's Specifications for Electrical Standards, as well.

1 **Q. How does the change in the rate structure affect the potential contribution in aid of**
2 **construction that the customer may be required to pay for service to the charging**
3 **stations?**

4 A. Given that the revenues from the proposed rates are lower versus the standard
5 commercial rates, given the change to the allocation of costs between kWh, kW, and the
6 customer charge, the customer will receive less of a revenue credit towards the costs for
7 the make ready work necessary for service, but their monthly bill will be lower.

8 **Q. Does Liberty's tariff allow flexibility in a customer charging the users of charging**
9 **stations?**

10 A. Yes. The tariff currently excludes electric vehicle charging from resale and with these
11 new tariff rates, the customer of record has the ability to charge its customers however
12 they would like -- per kWh or per minute, etc. The customer of record will have the
13 burden of determining the total costs of installing the service plus the monthly bill to
14 calculate the rate that the customer will charge to ensure their costs are being recovered
15 from charging customers.

16 **Q. Will the Company market these new rates?**

17 A. Yes. Once the rates are approved, the Company will market the new rates in its bill
18 inserts, website, and social media to let potential customers know the new rates are
19 available.

20 **Q. Is the Company including tariff pages in this filing?**

21 A. Yes, see Attachment HT/MS-2 for the proposed tariff pages.

1 **Q. Does the Company address make ready work in its tariff?**

2 A. Yes. The tariff describes the respective responsibilities of the Company and the customer
3 to ensure service is installed in accordance with our Standards for Electrical Service.

4 **IV. CONCLUSION**

5 **Q. Does this conclude your testimony?**

6 A. Yes, it does.

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**Liberty Utilities (Granite State Electric) d/b/a Liberty
Rate EV-L**

	Rate G-1 Billing Determinants	Rate G-1 Current Revenues	Rate G-1 Current Rates	Percent Split By Charge	Proposed % Split by Charge	Proposed Revenues	Proposed Rates
	(a)	(b)	(c.)	(d)	(e)	(f)	(g)
1 Customer Charge	1,742	\$747,073	\$428.76	6.98%	5.00%	\$534,882	\$307.05
2 kWh	367,232,595	\$1,293,482	\$0.00352	12.09%	85.00%	\$9,092,995	\$0.02476
3 kW	951,328	\$8,657,085	\$9.10	80.93%	10.00%	\$1,069,764	\$1.12
4	Total	\$10,697,641			Total	\$10,697,641	

- a Billing determinants from DE 19-064 test year
- b Current rates multiplied by billing determinants in (a)
- c Current rates
- d Line 1 / Line 4
- e Percent split
- f (e.) x (b)
- g (f) / (a)

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**Liberty Utilities (Granite State Electric) d/b/a Liberty
Rate EV-M**

	Rate G-2 Billing Determinants	Rate G-2 Current Revenues	Rate G-2 Current Rates	Percent Split By Charge	Proposed % Split by Charge	Proposed Revenues	Proposed Rates
	(a)	(b)	(c.)	(d)	(e)	(f)	(g)
1 Customer Charge	10,558	\$754,500	\$71.47	13.21%	5%	\$285,556	\$27.05
2 kWh	125,159,740	\$289,119	\$0.00300	5.06%	85%	\$4,854,449	\$0.03879
3 kW	510,109	<u>\$4,667,497</u>	\$9.15	81.73%	10%	<u>\$571,112</u>	\$1.12
4	Total	\$5,711,117			Total	\$5,711,117	

- a Billing determinants from DE 19-064 test year
- b Current rates multiplied by billing determinants in (a)
- c Current rates
- d Line 1 / Line 4
- e Percent split
- f (e.) x (b)
- g (f) / (a)

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Rate EV-L

Terms of Agreement

The term of the Service Agreement shall be one year, and shall continue thereafter until canceled by one month's notice to the Company by the Customer. The Customer will not be permitted to change from this rate to any other rate until the Customer has taken service under this rate for at least twelve months. However, upon payment by the Customer of a suitable termination charge, the Company may, at its option, waive this provision where a substantial hardship to the Customer would otherwise result.

Guarantees

When the estimated expenditure necessary to deliver electrical energy properly to a Customer's premises shall be of such an amount that the income to be derived from the delivery of such energy at the rate herein established, including the monthly minimum charge, will be insufficient to warrant such expenditure, the Company may require the Customer to guarantee a minimum annual payment for a term of years and/or to pay the whole or a part of the cost of extending, enlarging, or rebuilding its facilities to supply the Customer's premises or other reasonable payments in addition to the payments otherwise provided herein.

Location of Charging Stations

The order of preference for the location Company facilities to serve charging stations are (i) along public ways; (ii) along private roads maintained year-round; (iii) and over rights of way accessible by standard Company equipment. The Company may choose a higher preference location even if a lower preference location may result in a shorter line extension. The final placement of Company facilities to serve charging stations must be preapproved by the Company.

Distribution Facilities to Serve Charging Stations

1. Overhead Three-Phase Facilities

The estimated cost of distribution facilities, including the length of an Overhead Service Drop shall be derived based on the customer-specific job requirements and shall include all costs related to the construction of the distribution facilities, including but not limited to design and inspection and construction labor; researching and recording easements; materials; traffic control; tree trimming; blasting and overheads.

2. Underground Three-Phase Facilities

The estimated cost of distribution facilities, including the length of an Underground Service Drop shall be derived based on the customer-specific job requirements and shall include all costs related to the construction of the distribution facilities, including but not limited to design and inspection and construction labor; researching and recording easements; materials; traffic control; tree trimming; blasting and overheads and adding the result to the excess cost of any padmounted transformers to be installed. The excess cost of a padmounted transformer is the amount by which the cost of a padmounted transformer exceeds the cost of an equivalent pole-mounted transformer. The Company will determine the excess cost on the basis of average cost formulas consistently and equitably applied to all underground installations.

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Effective: XX XX 20XX Title: Neil Proudman
President

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Rate EV-L

Responsibilities

1. Overhead Facilities

The Company shall be responsible for:

- a) installing, owning and maintaining all poles, primary and secondary wires, transformers, service drops, meters, etc. that, in its opinion, are required to provide adequate service;
- b) designating the location of all Company owned equipment, the service entrance and meter location(s) at the house and,
- c) blasting and tree trimming and removal along public ways; the Company may charge the Customer the cost of such blasting and tree trimming and removal if, in the Company's opinion, such estimated cost is in excess of 50% of the average cost per foot.

The Company may require the Customer to provide in advance of engineering design and at no cost to the Company:

- a) blasting and tree trimming and removal along private ways;
- b) a complete copy of construction plans including the site plans approved by the planning board in the municipality, if such is required by the municipality;
- c) the Customer's best estimates of the likely load of the proposed charging stations; all applicable documents required for the Company to prepare an easement for its facilities to be installed on private property;
- d) a copy of the approval of the planning board, if such is required;
- e) a copy of all permits and approvals that have been obtained for construction;
- f) a schedule of the Customer's best estimate for construction;
- g) And such other reasonable information that may be requested.

2. Underground Facilities

The Company shall be responsible for:

- a) installing, owning and maintaining all poles, primary and secondary wires, transformers, service drops, meters, etc. that, in its opinion, are required to provide adequate service;
- b) designating the location of all Company owned equipment, the service entrance and meter location(s) at the house and,
- c) blasting and tree trimming and removal along public ways; the Company may charge the Customer the cost of such blasting and tree trimming and removal if, in the Company's opinion, such estimated cost is in excess of 50% of the average cost per foot.

The Company may require the Customer to provide, in advance of engineering design and at no cost to the Company:

- a) blasting and tree trimming and removal along public ways

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- b) a complete copy of construction plans including the site plans approved by the planning board in the municipality, if such is required by the municipality;
- c) the estimated electrical loads, as far as is known by the Customer all applicable documents required for the Company to prepare an easement for its facilities to be installed on private property;
- d) a copy of the approval of the planning board, if such is required;
- e) a copy of all permits and approvals that have been obtained for construction;
- f) a schedule of the Customer’s best estimate for construction;
- g) all applicable documents required for the Company to prepare easements for its facilities to be installed on private property;
- h) providing, installing, owning and maintaining all required foundations, handholes, manholes, grounding systems, primary and secondary cable, and conduit including spacers, glue and pulling strings, etc.;
- i) and such other reasonable information that may be requested.

All distribution facilities constructed under the provisions of this Rate to serve charging stations shall be and shall remain the property of the Company. The Company shall not be required to install distribution lines, transformers, Service Drops or meters under the above terms in locations where access is difficult by standard Company distribution construction and maintenance vehicles where the service does not comply with the Company’s environmental policy and procedures, or where it is necessary to cross a body of water.

Payments

Facilities in excess of those required to meet the distribution service requirements of the Customer are outside the scope of this policy and may entail additional payments from the Customer.

In accordance with the Formula below (the “Formula”), the Company shall determine whether a payment, by the Customer, of a Construction Advance shall be required. The Construction Advance shall be paid in full prior to the start of any construction.

$$\text{Construction Advance (A)} = C - (R/k)$$

Where:

A = the Construction Advance paid to the Company by the Customer.

C = the total estimated cost of construction for facilities required exclusively to meet the distribution service requirement of the Customer. This cost includes capital and non-capital costs. Where these new or upgraded facilities are not solely to provide service to the Customer, the Company shall appropriately apportion these costs.

R = the annual Distribution Revenue derived from the Customer within the first year following the completion of the Company’s construction of the facilities.

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k = the annual carrying charges measured at the time of construction, expressed as a decimal. Where the calculation of (A) results in a positive number, a construction advance in the amount of (A) shall be required from the customer. Where the calculation of (A) results in a negative number, (A) shall be considered to be zero. When the calculation of (A) results in a construction advance of \$500 or less, the payment of the construction advance will be waived.

The Company shall exercise good faith in making each estimate and determination required above.

Only revenues included in this calculation are Distribution revenues.

When in the Company's opinion, more than 32 hours of engineering is required to determine the method of service or prepare construction estimates, the Company will estimate the cost of such engineering. The Company may charge the Customer the excess of 32 hours of engineering before engineering begins. If construction is undertaken, this payment will be applied to any required construction advance. If construction is not undertaken, the Company will refund any balance not spent. If no Construction Advance is required, the entire Additional Advance Payment will be refunded unless excess costs are caused by the Customer.

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 Rate M-EV

Rate EV-M Commercial Plug In Electric Vehicle Charging Station

Availability

Retail Delivery Service under this rate is available for separately metered electric vehicle charging stations. A Customer will take delivery service on this rate if the Company estimates that its average use will be no greater than 72 kW of Demand. If electricity is delivered through more than one meter, except at the Company’s option, the charge for electricity delivered through each meter shall be computed separately under this rate.

Character of Service

Service supplied under this rate will be 60 cycle, alternating current single-phase normally three-wire at a nominal voltage of 120/240 volts for loads less than 72 kilowatts.

All voltages are not available in every area.

Rates per Month

The rate per month will be the sum of the applicable Customer, Demand and Energy Charges subject to the adjustments in this tariff:

Customer Charge	\$27.05 per month
<u>Energy Charges Per Kilowatt-Hour (cents per kilowatt-hour)</u>	
Distribution Charge	3.879
Reliability Enhancement/Vegetation Management	0.064
Total Distribution Charge	3.943
Demand Charge	\$1.12
Transmission Charge	2.418
Stranded Cost Adjustment Factor	(0.080)
Storm Recovery Adjustment Factor	0.000

Demand

The Demand for each month under ordinary load conditions shall be the greatest fifteen-minute peak which occurs during such month as measured in kilowatts.

Terms of Agreement

The term of the Service Agreement shall be one year, and shall continue thereafter until canceled by one month's notice to the Company by the Customer. The Customer will not be permitted to change from this rate to any other rate until the Customer has taken service under this rate for at least twelve months. However, upon payment by the Customer of a suitable termination charge, the Company may, at its option, waive this provision where a substantial hardship to the Customer would otherwise result.

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Guarantees

When the estimated expenditure necessary to deliver electrical energy properly to a Customer's premises shall be of such an amount that the income to be derived from the delivery of such energy at the rate herein established, including the monthly minimum charge, will be insufficient to warrant such expenditure, the Company may require the Customer to guarantee a minimum annual payment for a term of years and/or to pay the whole or a part of the cost of extending, enlarging, or rebuilding its facilities to supply the Customer's premises or other reasonable payments in addition to the payments otherwise provided herein.

Location of Charging Stations

The order of preference for the location Company facilities to serve charging stations are (i) along public ways; (ii) along private roads maintained year-round; (iii) and over rights of way accessible by standard Company equipment. The Company may choose a higher preference location even if a lower preference location may result in a shorter distance for the service. The final placement of Company facilities to serve charging stations must be preapproved by the Company.

Distribution Facilities to Serve Charging Stations

1. Overhead Single Phase Facilities

The estimated cost of distribution facilities, including the length of an Overhead Service Drop shall be derived based on the customer-specific job requirements and shall include all costs related to the construction of the distribution facilities, including but not limited to design and inspection and construction labor; researching and recording easements; materials; traffic control; tree trimming; blasting and overheads.

2. Underground Single Phase Facilities

The estimated cost of distribution facilities, including the length of an Underground Service Drop shall be derived based on the customer-specific job requirements and shall include all costs related to the construction of the distribution facilities, including but not limited to design and inspection and construction labor; researching and recording easements; materials; traffic control; tree trimming; blasting and overheads and adding the result to the excess cost of any padmounted transformers to be installed. The excess cost of a padmounted transformer is the amount by which the cost of a padmounted transformer exceeds the cost of an equivalent pole-mounted transformer. The Company will determine the excess cost on the basis of average cost formulas consistently and equitably applied to all underground installations.

Responsibilities

1. Overhead Facilities

The Company shall be responsible for:

- a) installing, owning and maintaining all poles, primary and secondary wires, transformers, service drops, meters, etc. that, in its opinion, are required to provide adequate service;

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- b) designating the location of all Company owned equipment, the service entrance and meter location(s) at the house and, blasting and tree trimming and removal along public ways; the Company may charge the Customer the cost of such blasting and tree trimming and removal if, in the Company' s opinion, such estimated cost is in excess of 50% of the average cost per foot.

The Company may require the Customer to provide in advance of engineering design and at no cost to the Company:

- a) blasting and tree trimming and removal along private ways;
- b) a complete copy of construction plans including the site plans approved by the planning board in the municipality, if such is required by the municipality;
- c) the Customer's best estimates of the likely load of the proposed charging stations; all applicable documents required for the Company to prepare an easement for its facilities to be installed on private property;
- d) a copy of the approval of the planning board, if such is required;
- e) a copy of all permits and approvals that have been obtained for construction;
- f) a schedule of the Customer's best estimate for construction;
- g) And such other reasonable information that may be requested.

2. Underground Facilities

The Company shall be responsible for:

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The Company may require the Customer to provide, in advance of engineering design and at no cost to the Company:

- a) blasting and tree trimming and removal along public way
- b) a complete copy of construction plans including the site plans approved by the planning board in the municipality, if such is required by the municipality;
- c) the estimated electrical loads, as far as is known by the Customer
- d) all applicable documents required for the Company to prepare an easement for its facilities to be installed on private property;
- e) a copy of the approval of the planning board, if such is required;
- f) a copy of all permits and approvals that have been obtained for construction;
- g) a schedule of the Customer's best estimate for construction;

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- h) all applicable documents required for the Company to prepare easements for its facilities to be installed on private property; providing, installing, owning and maintaining all required foundations, handholes, manholes, grounding systems, primary and secondary cable, and conduit including spacers, glue and pulling strings, etc.;
- i) and such other reasonable information that may be requested.

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$Construction\ Advance\ (A) = C - (R/k)$

Where:

A = the Construction Advance paid to the Company by the Customer.

C = the total estimated cost of construction for facilities required exclusively to meet the distribution service requirement of the Customer. This cost includes capital and non-capital costs. Where these new or upgraded facilities are not solely to provide service to the Customer, the Company shall appropriately apportion these costs.

R = the annual Distribution Revenue derived from the Customer within the first year following the completion of the Company's construction of the facilities.

k = the annual carrying charges measured at the time of construction, expressed as a decimal.

Where the calculation of (A) results in a positive number, a construction advance in the amount of (A) shall be required from the customer. Where the calculation of (A) results in a negative number, (A) shall be considered to be zero. When the calculation of (A) results in a construction advance of \$500 or less, the payment of the construction advance will be waived.

The Company shall exercise good faith in making each estimate and determination required above.

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Only revenues included in this calculation are Distribution revenues.

When in the Company's opinion, more than 32 hours of engineering is required to determine the method of service or prepare construction estimates, the Company will estimate the cost of such engineering. The Company may charge the Customer the excess of 32 hours of engineering before engineering begins. If construction is undertaken, this payment will be applied to any required construction advance. If construction is not undertaken, the Company will refund any balance not spent. If no Construction Advance is required, the entire Additional Advance Payment will be refunded unless excess costs are caused by the Customer.

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