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May 2, 2022

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301

Re: DE 21-004, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty; 2021 Least Cost Integrated Resource Plan; Status Report by Department of Energy

Dear Chairman Goldner:

By Procedural Order dated March 4, 2022, the Commission requested that the New Hampshire Department of Energy ("Department") initiate an investigation into what Liberty had described as a dire reliability picture in its Charlestown/Bellows Falls (CB) service area. The Commission required Liberty to file a report on the scope of these reliability issues on this date. Further, the Commission requested that the Department investigate such issues, and file a status report regarding its investigation on this date.

The Department has not undertaken a specific investigation but has questioned Liberty about reliability in the CB area through discovery requests in this docket issued March 24 and during a technical session held April 15, 2022. The reliability concerns have also been reviewed in DE 21-138, Liberty's Vegetation Management Plan for 2022.

Liberty indicates that the CB area is more rural, less developed, and has heavy vegetation as compared to its two other service areas (Lebanon/Hanover and Salem/Pelham). The CB area has sections of bare conductor that suffer frequent outages from tree and limb contact. In 2022, Liberty plans to replace approximately 2 miles of bare conductor on one of its worst performing circuits in the CB area. Further, Liberty plans to cycle trim 55 miles of overhead distribution lines in the CB area as part of its vegetation management plan.

Liberty indicates that the two circuits in the CB are primarily radial (portions are not tied to other area circuits) which contributes to longer outage durations due to limited switching capabilities. The Department anticipates Liberty's non-wires solution (NWS) scheduled to be presented for review on June 1, 2022, will help address this situation.

The Department will review Liberty's report to be filed today as well as its NWS to be presented on June 1, 2022 and will focus its review of reliability accordingly.

Consistent with the Commission's *Temporary Changes in Filing Requirements* (March 17, 2020), this letter is being filed solely in electronic form.

Thank you for your attention to this matter.

Sincerely,

/s/ *Paul B. Dexter*

Paul B. Dexter
Staff Attorney/Hearings Examiner

Cc: Service List