

THE STATE OF NEW HAMPSHIRE



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NHPUC 12MAR14am8:17

March 11, 2014

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street Suite 10  
Concord, New Hampshire

Re: DRM 13-090  
Readoption with Amendment of Puc 300, Electric Service Rules

Dear Ms. Howland:

Following today's public meeting of the Commission where it adopted the final proposal of the Puc 300 rules, the Chair directed Staff to talk with Granite State Electric Company d/b/a Liberty Utilities (Liberty) regarding Liberty's concern about the proposed final rules.

Specifically, Liberty expressed concern about Puc 306.09 which requires the electric utilities to file an emergency response plan (ERP) with the Commission. Puc 306.09 includes a table to be used in the development of an ERP that depicts a uniform classification of storm events for five event levels by (1) percentage of customers without power and (2) outage duration by hours. The highest level event as denoted in the table would occur when a utility projects that more than 20% of its customers will experience outages of 48 hours or greater. According to Liberty, the use of 20% results in 8,000 customer outages for Liberty, and the company would not consider 8,000 customer outages as catastrophic. Liberty said that it had previously provided comments that it preferred to use 25% instead of 20% as a measure for the highest level event.

As directed, Staff and Liberty talked through the issue and while a difference of opinion still remains, Liberty stated that the company would resolve the issue in the development of its ERP to assure the Commission that it has the information that it needs to perform its responsibilities.

Liberty did not address any other issues at the meeting with Staff.

Public Service Company of New Hampshire (PSNH) noted that the E-38 form regarding the reporting of reliability indices. PSNH was concerned that it would have to file

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multiple reports based on the number of areas it served and wanted to consolidate the reporting of multiple areas on a single form. Staff and PSNH agreed that the concerns could be addressed by adding instructions on how to complete the form.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzanne G. Amidon', with a large, stylized initial 'S'.

Suzanne G. Amidon  
Staff Attorney

Service List (electronically)

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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**FILING INSTRUCTIONS:**

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**
- DEBRA A HOWLAND  
EXECUTIVE DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**