

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities

DE 19-064
Distribution Service Rate Case

Staff Data Requests - Set 6

Date Request Received: 8/23/19
Request No. Staff 6-40

Date of Response: 9/11/19
Respondent: Joel Rivera

REQUEST:

RE: Company's Response to Staff 5-14(d), Salem Planning Study and Justification Documents

- a. Please explain the elimination of plans listed on Attachment Staff 5-14 (d)(i) pages 130-137 with the level of detail provided compared to the level of detail in each of the alternate plans listed on pages 77-130.
- b. Each of the 5 alternate plans indicates an elimination of on or more 23kV substations due to asset condition. For Barron Ave, Olde Trolley, and Salem Depot substations:
 - i) Please provide the last 5 years of substation inspection and maintenance records
 - ii) Please provide the last 5 years of substation related work that arose from the inspection and maintenance records
 - iii) Please provide all technical documents and recommendations that would support the elimination of these substations.

RESPONSE:

- a. A total of twelve plans were evaluated to address the existing and future system needs of the area. Six of these plans were eliminated because of transmission costs and construction challenges due to site locations. Refer to Appendix A of the Salem Area Study for a summary of all Eliminated Plans including scope, costs, and pros and cons. There are no additional details than what is provided here. These six rejected Alternative plans were not developed with the level of detail of the five Alternate plans and were not weighed against the Recommended Plan listed on pages 77-130 because they were eliminated early in the study process.
- b. Please see the following:
 - i. Please refer to Attachment Staff 6-40.b.i.1, Attachment Staff 6-40.b.i.2, and Attachment Staff 6-40.b.i.3 for a list of inspection and maintenance records for the last 5 years for Barron Ave, Salem Depot, and Olde Trolley Substations, respectively.

Docket No. DE 19-064 Request No. Staff 6-40

- ii. Please refer to Attachment Staff 6-40.b.ii for a list of emergency work performed for the last 5 years for Barron Ave, Salem Depot, and Olde Trolley Substations. A detailed list of all related work that arose from inspection and maintenance records is not available at this time.
- iii. Please refer to Docket No. DE 16-383 Response to Staff 4-51 and Attachment Staff 4-51.