



Michael J. Sheehan, Esq.
 Director, Legal Services
 Phone: 603-724-2135
 Michael.Sheehan@libertyutilities.com

July 2, 2024

Via Electronic Mail Only

New Hampshire Department of Energy
 21 South Fruit Street
 Concord, New Hampshire 03301-2429

**Re: NHDOE RUL 2024-004 (Rulemaking Notice No. 2024-92)
 En 300 Rules for Electric Service
 Liberty Comments on Initial Proposal**

On behalf Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, I write with comments on the proposed En 300 rules.

First, Liberty supports the comments to be filed by Eversource. Liberty also offers the following.

En 305.03

In addition to Eversource’s comments regarding meter testing frequency, Liberty proposes the following specific language changes:

Proposed En 305.03(c)(1)b.1.:

A sample test group, selected at random representing a cross-section of the utility’s meters, comprised of at least ~~1%~~ **0.5%** of meters in use but not fewer than ~~500~~ **250** meters.

In support of this proposed change, below are the results of Liberty’s meter testing program over the past three years. The low failure rate and the costs to be saved by conducting fewer meter tests warrant the DOE’s adoption of the recommended changes above.

Number of Liberty Meters Tested and Annual Failure Rate				
Year	Single Phase (residential)	Transformer Rated- Three Phase	Self-Contained- Three Phase	Transformer Rated Single Phase
2021	608 tested - 6 failed (0.97%)	171 tested – none failed	258 tested – none failed	12 tested – none failed
2022	588 tested - 3 failed (0.51%)	177 tested – none failed	216 tested – none failed	12 tested – none failed
2023	568 tested - 2 failed (0.18%)	149 tested – none failed	230 tested – none failed	14 tested – none failed

En 307.07

As referenced during the public comment hearing, Liberty also requests a change to the rule that governs the required width of the tree trimming corridor that is currently in Puc 307.10 (and that is being removed from the proposed Puc 300 rules).

For decades prior to Liberty's acquisition of Granite State Electric Company, the company had established and maintained a side clearance of 6 feet. It is my understanding that the other New Hampshire utilities had maintained an 8-foot side clearance. Liberty's efforts to establish the 8-foot corridor since the 2014 passage of existing Puc 307.10, which efforts have established the wider corridor for only a small portion of its system, have imposed substantial costs on Liberty's customers. Establishing a wider clearance over the hundreds of miles of forested lines requires the removal of thousands of large trees. Liberty believes that maintaining a 6-foot corridor is consistent with good utility practice and will reduce customer costs. Therefore, Liberty recommends the following change to proposed En 307.

En 307.07 Tree-Pruning Standards.

(a) With the landowner's consent, utilities shall prune trees adjacent to all distribution circuits to the following minimum clearances on no more than a 5-year cycle:

- (1) 10 feet below the conductors;
- (2) ~~8~~6 feet to the side of the nearest conductor; and
- (3) 15 feet above the conductors, at time of pruning.

Thank you.

Sincerely,



Michael J. Sheehan