



Interrogatories of Commission Expert

TO: Maritime Electric Company, Limited

FROM: Synapse Energy Economics, Inc.

DATE: March 4, 2022

RE: UE22503 - Rate Design

Synapse Third Set of Information Requests to Maritime Electric

- 1) Refer to MECL's response to IR-28 from Synapse Energy Economics, Inc., submitted on October 1, 2021 that describes the 45 "Other Usage" customers with more than 5,000 kWh of consumption in January 2020. Please also refer to MECL's rules and regulations, which defines a farm as "a holding on which agricultural operations are carried out. Agricultural operations include the production of field crops including grain, vegetables, seed and forage crops; animal and dairy products including milk, cream, eggs, meat and poultry products, poultry hatcheries, nurseries and greenhouses for the production of crops or bedding plants, fur farms, apiaries, fish hatcheries and fish farms."
 - a) Please explain whether "cannabis grow operations," "fish farming," and "agricultural related" customers in the table provided in response to IR-28 meet the definition of a "farm" according to MECL's rules and regulations. If no, please explain why not.
 - b) Please explain why the cannabis, fish farm, and agricultural-related customers are not classified as farms in the Company's Rate Design Application filed on May 14, 2021.
 - c) How were the cannabis, fish farm, and agricultural-related customers classified for the 2017 and 2020 cost allocation studies?
- 2) Refer to MECL's response to IR-28 from Synapse Energy Economics, Inc., submitted on October 1, 2021 that describes the 45 "Other Usage" customers with more than 5,000 kWh of consumption in January 2020.
 - a) For each of the six customer types in the table provided in response to IR-28, please provide the group's average energy consumption (kWh) for each month of 2019, 2020, and 2021.
 - b) For each of the 9 "agricultural-related" customers, please provide the customer's energy consumption (kWh) for each month of 2019, 2020, and 2021.
 - c) For each of the 11 "misc. commercial operations" customers, please provide the customer's energy consumption (kWh) for each month of 2019, 2020, and 2021.
 - d) Please provide more details regarding the nature of electricity usage for the customers characterized as "misc. commercial operations" and explain why these customers meet the Company's residential service rate guidelines.

- 3) Refer to MECL's rate design application filed on May 14, 2021, pages 5-6.
- a) Please confirm that none of the customers in Cohort 5 (domestic consumption >5,000 kWh for January 2020) or Cohort 7 (other consumption >5,000 kWh for January 2020) have meters capable of measuring monthly demand or hourly energy usage. If this is not the case, please describe the metering data available and provide the most granular data available for the most recent three years.
 - b) Please confirm that the estimates of coincident peak (CP) and non-coincident peak (NCP) for Cohort 5 were developed using the CP and NCP data for Cohort 4.
 - c) If no customers in Cohort 7 have interval metering, please explain how the Company developed CP and NCP estimates for Cohort 7.
 - d) How many customers in Cohort 5 would require load research meters for a representative sample with an acceptable level of accuracy (e.g., +/- 10% at 90% confidence level)?
 - e) How many customers in Cohort 7 would require load research meters for a representative sample with an acceptable level of accuracy (e.g., +/- 10% at 90% confidence level)?
 - f) What is the cost (labor and materials) to add an additional load research meter?

Additional interrogatories may follow.