

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

RE: LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. D/B/A LIBERTY  
UTILITIES

DOCKET NO. DE 15-\_\_\_

**Petition for Waiver of Puc 909.08(h)**

NOW COMES Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (“Granite State” or the “Company”) and petitions the New Hampshire Public Utilities Commission (the “Commission”) for waiver of the requirements of Puc 909.08(h) to the extent that it requires the Company to determine the costs to upgrade its systems to implement group net metering pursuant to RSA 362-A:9,XIV(d). In support hereof, the Company states as follows:

1. On January 7, 2015, the Commission adopted Puc 909 which sets forth requirements for group net metering based on 2013 N.H. Laws Ch. 266 that was enacted on July 24, 2013. Under those rules, distribution utilities such as Granite State have certain responsibilities, including paying group net metering hosts for the host’s surplus generation at the end of each billing cycle. To the extent that distribution utilities seek to impose on group net metering hosts the costs of any information system upgrades necessary to implement group net metering as required by RSA 362-A:9, XIV(d), distribution utilities have 90 days from the effective date of the rules to file with the Commission sufficient information for the Commission to determine whether such costs are reasonable. Thus, such costs must be filed with the Commission no later than April 7, 2015.

2. Granite State requests that the Commission waive the 90 day requirement under Puc 909.08(h), and provide it with additional time to determine whether it will upgrade its information systems to accommodate Puc 909, and if so, the cost associated with it.

3. Under Puc 201.05, the Commission shall waive the provisions of any of its rules when the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. In determining whether the waiver will serve the public interest, the Commission must determine whether compliance with the applicable rule would be onerous or inapplicable given the circumstances, or the purpose of the rule would be satisfied by another method.

4. Waiver of Puc 909.08(h) will serve the public interest because the Commission clearly intended to allow distribution utilities the ability to ascertain whether upgrades to information systems were necessary. It is not yet clear to the Company whether it will need to make changes to its newly implemented customer information system to accommodate the Puc 909 requirements, or whether the Company will be able to satisfy those requirements through manual processes, thus obviating the need to seek recovery of any system upgrades. By requesting this waiver, the Company merely seeks to keep open the window of opportunity to bring those potential system upgrade costs to the Commission for its consideration. Doing so will not disrupt any matters before the Commission as the Company is not aware of any proceedings relating to net metering that are currently under consideration.

WHEREFORE, Granite State respectfully requests that the Commission:

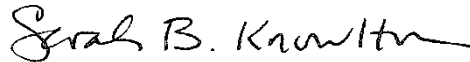
A. Grant this waiver of Puc 909.08(h), and;

B. Grant such other relief as is just and reasonable and consistent with the public interest.

Respectfully submitted,

LIBERTY UTILITIES (GRANITE STATE ELECTRIC)  
CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



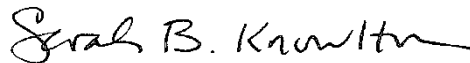
Date: March 18, 2015

By: \_\_\_\_\_

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Certificate of Service

I hereby certify that on March 18, 2015, a copy of this Petition has been forwarded to Susan Chamberlin, Consumer Advocate.



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Sarah B. Knowlton