

The State of New Hampshire  
New Hampshire Public Utilities Commission

Docket No. DE 16-864

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

Methodology for Billing Net Metered Customers-Rate G-1

**Petition to Approve Tariff Change for Rate G-1 Customers Pursuant to Puc 903.02(p)**

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (“Liberty”), through counsel, respectfully petitions the Commission pursuant to RSA 362-A:9, Puc 203, and Puc 903.02(p) to approve a change in its tariff to add to the net-metering program Liberty’s Rate G-1 customer-generators, who receive time-of-use distribution rates, and to describe the method by which they “may be provided service under time-based net energy metering tariffs.” RSA 362-A:9, VIII; Puc 903.02(p). The “resulting rates are just and reasonable and in accordance with RSA 362-A:9, VIII.” Puc 903.02(p).

In support of this petition, Liberty represents as follows:

1. Liberty provides distribution service to its largest customers under Rate G-1, which is a time-of-use (“TOU”) distribution rate. *See* Tariff Pages 41 - 44 and 68. Customers taking service under this rate pay on-peak and off-peak distribution rates for power taken during on-peak and off-peak periods, respectively. The energy service rates do not vary by time. Tariff Page 68.
2. Currently, Liberty does not have TOU net metering provisions in its tariff that would apply to its “small customer-generators” that fall within Rate G-1, *i.e.*, those with systems smaller than 100 kilowatts (“kW”) (hereinafter “Small Rate G-1 customers”). Puc 902.19. Also, Liberty does not currently have any Small Rate G-1 customers who are net-metered. In anticipation of future Small Rate G-1 customers that wish to participate in the net metering program, Liberty proposes in this petition the necessary tariff changes to allow for and to accommodate these TOU

customers. Utility-specific net metering tariffs for TOU customers are authorized by statute:

Notwithstanding other provisions of this section, the commission may establish, on a utility-specific or generic basis, a methodology by which customer-generators may be provided service under time-based, net energy metering tariffs. The methodology shall specify how a customer's energy usage and generation shall be metered, how net energy usage shall be calculated and any applicable charges applied, and how excess generation shall be credited, consistent with size limits and the terms and conditions and intent of this section and other requirements of state and federal law.

RSA 362-A:9, VIII.

3. Note that any “large” Rate G-1 customer-generators, those with net-metered systems between 100 kW and one megawatt, Puc 902.15, do not require new tariff language because Liberty would not reimburse large Rate G-1 customers for distribution charges, which do vary by time under Liberty’s tariff, but would only reimburse them for excess generation at the applicable default service rates, which do not vary by time. RSA 362-A:9, IV; Puc 903.02(g); Tariff Page 68. Thus, net metering will not affect the TOU rates paid by Liberty’s large Rate G-1 customers.

4. Attached is the testimony of Heather M. Tebbetts, which describes the proposed method for billing Small Rate G-1 customers who net meter. Also attached is the proposed tariff language, both red-lined and clean versions.

5. Briefly, Liberty proposes that the compensation for energy exported during on-peak hours (which includes the default service rate and the higher on-peak distribution charges) will be credited to on-peak energy imported in the customer’s future bills, and compensation for energy exported during off-peak hours (which includes the same default service rate and the lesser off-peak distribution charges) will be credited to off-peak energy imported in the customer’s future bills.

6. This compensation method for Small Rate G-1 customers results in “just and reasonable” rates for the following reasons. First, aligning on-peak exports with on-peak imports and off-peak exports with off-peak imports will properly align the compensation with the generation and will avoid further cross-subsidization that may exist in the net metering program. Otherwise, a Rate G-1 customer being paid on-peak compensation for off-peak generation would

receive a windfall.

7. And second, the rates used to compensate Small Rate G-1 customers for their excess generation are the Commission-approved distribution and default service rates.

8. Thus, the proposed tariff changes are “consistent with [the] size limits and the terms and conditions and intent of this section and other requirements of state and federal law.”

RSA 362-A:9, VIII.

WHEREFORE, Liberty respectfully asks that the Commission to:

- (a) approve Liberty’s proposal to implement the net metering TOU methodology for customer-generators taking service under Rate G-1 as filed; and
- (b) grant any further relief deemed just and reasonable.

Respectfully submitted,

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

By its Attorney,



Date: December 28, 2016

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

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Certificate of Service

I hereby certify that on December 28, 2016, a copy of this Petition has been forwarded to the Office of Consumer Advocate.



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Michael J. Sheehan