



**Acadia  
Center**

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**THE STATE OF NEW HAMPSHIRE  
BEFORE THE PUBLIC UTILITIES COMMISSION**

**Docket No. DE 17-189  
LIBERTY UTILITIES  
Petition to Approve Battery Storage Pilot**

**Comments of Acadia Center on Liberty Utilities' Battery Storage Pilot Proposal**

Acadia Center welcomes the opportunity to comment on Liberty Utilities' proposed battery storage pilot. Energy storage has transformative potential in helping achieve a clean and efficient power grid. Advances in energy storage are needed to enable our outdated grid to support the growth of renewable energy, reduce consumer costs and prevent or delay costly infrastructure upgrades.

In light of the recent Order No. 26,124, suspending non-wires alternative pilots in the net metering docket, it is more important than ever to proceed with on-the-ground pilots to test the value of storage and other distributed energy resources to the grid. It is equally important to design them correctly.

While we applaud Liberty for putting forward this proposed pilot, it can be strengthened in several areas to provide more value to customers and more appropriately lay the groundwork for large-scale adoption of behind-the-meter storage in the future.

Setting the precedent for utility ownership of behind-the-meter resources is worrying. Such ownership, particularly if not limited in some manner, may interfere with the development of a strong residential storage market. For these reasons, both California and New York have restricted utility ownership of energy storage projects. Liberty's proposed pilot could enroll up to 2.8% of customers in its service territory, exerting significant influence on the market there.

Acadia Center supports the joint testimony submitted by Sunrun and Revision Energy ("Joint Testimony"), and endorses the proposed alternative program design which would allow customers to furnish their own storage equipment. Furthermore, if any utility ownership of storage is approved, it should be scaled down as described in the Joint Testimony, and concentrated in the NWA tranche, as opposed to the general market tranche of the program.

In conclusion, Acadia Center encourages the Commission to approve a battery storage pilot, modified by the suggestions given in the Joint Testimony.

Sincerely,

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