

**BEFORE THE PUBLIC UTILITIES COMMISSION
STATE OF NEW HAMPSHIRE
DE 17-189**

**LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.
d/b/a LIBERTY UTILITIES**

Petition to Approve Battery Storage Pilot Program

CITY OF LEBANON PETITION TO INTERVENE

Now Comes the City of Lebanon (“City”) and petitions the New Hampshire Public Utilities Commission, in response to the Order of Notice issued by the PUC on 12/13/17 in this matter and pursuant to NH Code of Administrative Rules Puc 203.2 and Puc 203.17 and NH RSA 541:A:32, to allow the City to intervene in the above-captioned matter for the following reasons:

1. The City is a municipal corporation and subdivision of the State of New Hampshire with an address of 51 North Park St., Lebanon, NH 03766.
2. The City is an electric customer of Liberty Utilities with approximately 85 meters and accounts and in 2016 purchased and consumed approximately 4 million kWh. As such the City has an interest in whether the inclusion of certain battery procurement and installation costs in Liberty’s base rates is just and reasonable and whether charging participating customers a portion of those costs is just and reasonable and non-discriminatory.
3. Pursuant to our Master Plan, which is an official City policy, the City has a strong interest in promoting the development of cost-effective distributed energy resources to reduce both the carbon impact and cost of our energy consumption and to help our energy systems become more resilient and sustainable to support the long-term prosperity of our local economy and the City. The City Council has also unanimously resolved to support the goals of the Paris

Climate Accord. The increased deployment of energy storage technologies such as the batteries proposed in this proceeding is likely a factor in the rate and scale that distributed renewable electric generation and can be cost-effectively integrated into the distribution grid.

4. The City was an active participant in the Commission's Grid Modernization Investigation (IR-15-296) and Working Group, helping to develop and support rate design recommendations that call for development of time-varying rates for distribution and transmission services "using simple on-peak and off-peak periods" (Final Report, 3/20/17, at 14). Liberty's proposed distribution and transmission TOU rates in their petition appear to be a significant pilot of such recommended rate design.
5. The City is an intervenor in the Net Metering proceeding DE 16-576 where it provided direct and rebuttal testimony, including testimony arguing that, ideally, for net metering "[v]olumetric distribution rates would likewise [as with demand charges] be modified in a revenue neutral manner so that most costs are recovered during a limited number of pre-defined hours when system peaks are most likely to occur." Direct Testimony of Clifton C. Below, 10/24/16 at lines 205-207. Liberty's proposed battery pilot appears to pilot such an approach.
6. In Order No. 26,029 in DE 16-576 the Commission directed "Liberty to work with the City to develop the proposed RTP pilot program for filing with the Commission." The City and Liberty have been working to prepare such a proposal and hope to file such within the next few months, although there are still some unresolved issues, particularly around metering, that may relate to issues in this proceeding.
7. In its filing in this battery pilot petition, as well as in the NWA pilot working group in DE 16-576, Liberty has identified two feeders in West Lebanon, which is part of the City of

Lebanon, where a future capacity upgrade may be required and that may be particularly suitable for consideration of non-wires alternatives, which may include targeting its proposed battery pilot in this area. Direct Testimony of Heather M. Tebbetts at pp. 12-13. The City has filed comments with the Commission regarding clarification of NWA pilot program issues on 12/8/17 that reference Liberty's NWA potential in West Lebanon. It is not clear the extent to which Liberty's proposed battery pilot might work with and complement or compete and conflict with the City's proposed piloting of RTP in a municipal aggregation.

8. The City has a substantial interest in the issues to be addressed by this docket and the City's intervention will not impair the orderly and prompt conduct of the proceedings, will not result in undue delay, and will not prejudice the interest of any party.

WHEREFORE, the City of Lebanon requests that the Commission grant this petition to allow the City to be made a full intervenor in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted this 22nd day of December 2017.

City of Lebanon



Paula Maville, Interim City Manager