

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

Docket No. DE 17-189

Liberty Utilities' Petition to Approve Battery Storage Pilot Program

REVISION ENERGY, INC.'S MOTION TO INTERVENE

NOW COMES ReVision Energy, Inc. pursuant to Puc 203.02 and RSA 541-A:32, and requests leave to intervene in the above-captioned matter. In support of this motion, ReVision Energy, Inc. states as follows:

- 1) ReVision Energy, Inc. (ReVision) is an employee-owned corporation with offices in Maine, New Hampshire, and Massachusetts. ReVision sells, installs, and maintains solar electric and solar thermal systems, high efficiency heat pumps, battery storage systems, LED lighting, and electric vehicle charging stations, to customers in the residential, commercial, and industrial sectors. ReVision employs a work force of 70 individuals in New Hampshire.
- 2) In the past several years ReVision has seen a sharp rise in consumer interest in battery storage systems in New Hampshire. ReVision installs both residential and commercial battery storage systems that serve to store electricity generated by solar electric arrays.
- 3) If approved, Liberty Utilities' proposed battery storage pilot program would result in up to 1000 households receiving battery storage systems that would apparently be subsidized in large part by other Liberty ratepayers.
- 4) The proposed pilot program could impact the competitive marketplace for residential battery storage systems in New Hampshire. Consequently, ReVision has a direct interest in the outcome of this docket.

5) Allowing ReVision to intervene will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, ReVision Energy, Inc. respectfully requests that it be granted full intervenor status in this docket.

Respectfully submitted,

REVISION ENERGY, Inc.



Jack Ruderman
Director, Community Solar Initiatives
ReVision Energy, Inc.
14 Dixon Avenue
Concord, NH 03301

Dated: December 29, 2017

CERTIFICATE OF SERVICE

I hereby certify that seven copies of the foregoing motion have been hand-delivered to the Public Utilities Commission on December 29, 2017, and additional copies will be sent via electronic mail to Liberty Utilities and the Office of Consumer Advocate.



Jack K. Ruderman
Director, Community Solar Initiatives
ReVision Energy, LLC