

THE STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

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

Docket No. DE 17-189

Petition to Approve Battery Storage Pilot Program

**Motion to Extend Meter and Battery Installation Deadlines**

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, through counsel, respectfully moves the Commission to extend the deadline for installing the first 100 Phase I batteries from June 30 to August 31, 2020, and the deadline for installing the balance of Phase 1 batteries to October 31, 2020, because of the COVID-19 pandemic.

In support of this motion, Liberty represents as follows:

1. In March 2020, the Commission extended the deadlines for installing the Phase 1 batteries:

[A]ll meters for Phase 1 premises should be installed and operational on or before June 30, 2020. A minimum of 100 batteries must be installed and operational on or before that date, at which point the initial test period will begin. The remainder of the batteries permitted in Phase 1, up to 200, must be installed and operational on or before September 30, 2020.

Order No. 26,337 at 7-8 (Mar. 9, 2020).

2. The Company promptly began installing the new meters necessary for the battery storage customers and has completed 48 meter installations, which will serve the first 100 batteries. Liberty intends to satisfy the existing June 30 deadline for installing all the Phase 1 meters. The Company also notified Tesla to begin installation of the battery systems.

3. Tesla initially reported that the COVID-19 pandemic would not impact its ability to begin installations, but Tesla had to delay installations for a period of time due to the Governor's emergency orders. Tesla commenced installations on May 26, 2020. Although it is possible that the first 50 installations (and 100 batteries) will be completed by the current June 30 deadline, Liberty files this motion to allow flexibility in light of the unknown consequences of the pandemic.
4. This motion thus seeks an extension of the deadlines for installing the first 100 batteries (serving the first 50 customers) to August 31, 2020, and for installing the balance of the Phase 1 batteries to October 31, 2020.
5. The Company is working through a list of additional interested customers to pre-qualify those who will receive the remaining Phase 1 meters and battery systems. The Company will install all Phase 1 meters by the existing June 30 deadline.
6. The Company recognizes that the extension requested in this motion creates the risk that insufficient batteries will be installed to acquire meaningful peak load data from the 2020 summer season. The Company also recognizes that it may be best to have data from two peak (summer) periods when considering the Company's future request to proceed with Phase 2 of the program. *See* Order No. 26,209 at 19-20 (Jan. 17, 2019) (summarizing the Settlement Agreement's provision that Phase 1 is subject to a test period of 18 months, beginning when the first 100 become available for dispatch). If the first 100 batteries are not installed in time to serve the summer 2020 peak hour, that 18-month period would expire with the batteries having been in service only for the summer peak of 2021.
7. In view of that risk, Liberty commits that, in the event that fewer than 100 Phase 1 batteries have been installed and become fully operational and available for dispatch by

July 1, 2020, Phase 1 shall be extended through August 31, 2022, to permit additional data collection before considering approval of Phase 2.

8. Counsel provided a draft of this motion to Staff and the Office of the Consumer Advocate. Staff and the OCA indicated that they assent to the motion.

WHEREFORE, Liberty respectfully asks that the Commission:

- a. Extend until August 31, 2020, the deadline for installing the first 100 Phase 1 batteries, and until October 31, 2020, for installing the remaining Phase 1 batteries;
- b. Extend Phase 1 through August 31, 2022, if fewer than 100 Phase 1 batteries have been installed and become fully operational and available for dispatch by July 1, 2020; and
- c. Grant such other relief as is just and reasonable.

Respectfully submitted,  
Liberty Utilities (Granite State Electric) Corp.  
By its Attorney,



Date: May 26, 2020

By: \_\_\_\_\_  
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Certificate of Service

I hereby certify that on May 26, 2020, a copy of this motion has been electronically forwarded to the service list.



By: \_\_\_\_\_  
Michael J. Sheehan