



Michael J. Sheehan, Esq.
Senior Counsel
Phone: 603-724-2135
Email: Michael.Sheehan@libertyutilities.com

September 16, 2021

Via Electronic Mail Only

Dianne Martin, Chairwoman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: Docket No. DE 19-064; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Notice of Intent to File Rate Schedules**

Dear Chairwoman Martin:

On behalf of Liberty Utilities (Granite State Electric) Corp., I write to respond to the requirements of Order No. 26,512 (Aug. 29, 2021) that pertain to Exhibit 80.

The relevant language from the Order states as follows:

The record request to be answered in Exhibit 80 required Liberty to show the benefits of the battery installation for each individual customer, with customer names redacted. See Transcript 6-24-2021 at 152-53. Instead, Liberty submitted Exhibit 80 with all customer data for the 60 customers aggregated. The Commission asked for a limited set of data for the first quarter of 2021 in order to review the progress and effectiveness of the battery pilot. At hearing, Liberty did not indicate that the request was burdensome, nor did it indicate that it could not comply with the record request. Therefore, we deny rehearing as to conditioning cost recovery for the battery pilot investment on production of a conforming response to Record Request 80 and review by the Commission thereafter.

* * *

FURTHER ORDERED, that Liberty shall file with the Commission a revised Exhibit 80 consistent with the Record Request as described in this order.

Order 26,512 at 7, 8 (emphasis added).

In response, the Company notes, first, that given the Commission's acknowledgement that the requested individual customer information was not needed prior to issuing an order and given the July 15, 2021, submission deadline, the Company gathered the aggregate data for all customers with batteries installed for the first quarter of 2021 to coincide with the quarterly report filed on May 15, 2021, as was discussed during the hearing. This was not done to avoid providing the individual customer data but rather was the path chosen to provide relevant data in the most expedient manner. See the initial version of Exhibit 80 which reproduced the record request as, "Please provide the benefits to the battery storage customers for Q1 2021," to which the Commission did not respond or correct until Order No. 26,512.

Second, it turned out to be a more substantial task than anticipated to calculate each participating customer's battery benefits, thus this filing was delayed until now.

Third, the Company repeats its contention that the information provided in Exhibit 80 is irrelevant to the Company's right to recover the 2020 costs to install the batteries as requested in the third step increase. Whether the customers saved money is information that will be relevant when the Commission decides to continue the pilot into Phase 2, but is not relevant at this cost recovery stage. Indeed, Commissioner Goldner acknowledged as much at hearing:

[Sheehan] However, I don't have a handle on how long it might take us to go through the battery customers to calculate, you know, their individual benefit. And I'm not sure, frankly, if we could get that in time for a July 1 order in this docket. I think that that information may not affect this particular case, the resolution of it. So I wonder if the Commission is looking for it prior to order, or whether if it comes in sometime after that would be acceptable.

CHAIRWOMAN MARTIN: Commissioner Goldner, did you have a timing on that? Are you okay if it comes in after the order is needed in this case?

COMMISSIONER GOLDNER: I think that would be fine, yes.

Dianne Martin, Chairwoman

September 16, 2021

CHAIRWOMAN MARTIN: Okay

Transcript of June 24, 2021, hearing at 179 (emphasis added).

In compliance with the Order, attached is a Supplemental Exhibit 80, marked as Exhibit 80A for clarity, which includes a calculation of each participating customer's battery benefits.

The first page of Exhibit 80A provides the overall summary of benefits. The total overall benefit in Exhibit 80A is \$23.15 greater than what was provided in Exhibit 80 because the Daylight Savings Time change on March 15 was not accounted for in the original response. The following pages of Exhibit 80A provide the amount of kWh that each customer's battery used to either charge, to provide power to the home, or to provide power to the grid. The Value of Battery Energy section provides the rate multiplied by the kWh that the battery used to charge (positive kWh) or provide power to the home or grid (negative kWh). In instances where the batteries provided power to the home or the grid, the dollars do not represent a bill credit; rather they represent the total value of the kWh from the batteries that provided power to the customer, therefore the customer did not need to take that power from the grid at the total rate for the period.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided. Thank you.

Sincerely,



Michael J. Sheehan

Cc: Service List
Enclosures