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Via Electronic Mail and Hand-Delivery

Debra A. Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: DE 17-189 Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities
Petition to Approve Battery Storage Pilot Program**

Dear Ms. Howland:

On behalf of Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, I write in response to Staff's Memorandum of February 13, 2020, which recommended that the Commission extend until June 30, 2020, the deadline for installation of the first 100 batteries, "subject to the following additional conditions." Liberty has no objection to Staff's proposed conditions and thus asks the Commission to extend the deadline to June 30, 2020.

Liberty does not request a further hearing on this matter.

Staff's first proposed condition is that Liberty file the "supporting documentation for its cybersecurity evaluation, subject to appropriate claims for confidential treatment." Staff Memorandum at 1. Liberty will make that filing shortly.

The second proposed condition is that Liberty complete its analyses of Phase 1 performance "based on actual Phase 1 experience to include all relevant program changes and updates to accurately reflect the actual benefits obtained and costs incurred in initial program implementation." *Id.* Staff's memorandum explains these program changes and updates in detail. Liberty accepts this condition.

Staff's third proposed condition is that Liberty modify its "customer marketing, disclosure, educational, and contractual materials to reflect lack of advance notice to customers of projected dispatch events," *id.*, and that Liberty make those materials available for Staff review. *Id.* Liberty had previously updated its educational materials and disclosures to address this issue (which materials consist of a video and FAQs available on the Company's website),

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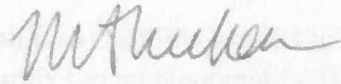
and Liberty has this date provided Staff with the updated customer contract that reflects customers will not receive advance notice of projected dispatch events. Liberty thus accepts this condition.

Staff's final proposed condition is that Liberty collect "pre-installation electricity usage data from participating customers ... as provided for in section II.C of the approved settlement agreement," *id.*, which Staff later specified to request that "Liberty should be directed to begin installing the meters at all 100 prospective customer locations^[1] within one week of the issuance of an order extending the Phase I battery installation deadline," *id.* at 8, and that Liberty also collect and provide "load research meter load data for similar intervals ... as part of the baseline study, as proposed by Liberty and its consultant," *id.* at 1. Liberty accepts these proposed conditions.

Liberty thus asks that the Commission promptly issue an order granting Liberty's motion to extend the deadline for installing the Phase 1 batteries, and to extend that deadline to June 30 as recommended by Staff.

Thank you.

Sincerely,



Michael J. Sheehan

cc: Service List

¹ To clarify, since each participating customer will receive two batteries, Phase 1 requires the installation of at least 100 batteries in 50 customer homes, and no more than 200 batteries in 100 customer homes. Thus, Liberty need not install meters "at all 100 prospective customer locations" to meet the Phase 1 minimum requirement of 100 batteries in 50 homes.