

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

DE 17-189

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

Petition to Approve Battery Storage Pilot Program

**MOTION TO ENTER TESTIMONY OF JUSTIN R. BARNES INTO THE
RECORD AND REQUEST TO SUBMIT WRITTEN CLOSING STATEMENT**

Pursuant to New Hampshire Code of Administrative Rule Puc 203.07, Sunrun Inc. (“Sunrun”) and ReVision Energy, Inc. (“ReVision”), respectfully submit this motion to enter the pre-filed direct testimony of Justin R. Barnes, dated May 2, 2018, into the record as testimony in the above-referenced proceeding (“Motion”). In support of this Motion, Sunrun and ReVision state:

1. Mr. Barnes lives out of state and has scheduling conflicts that prevent him from appearing to adopt his testimony at the Settlement Hearing scheduled for Thursday, November 29, 2018.
2. Mr. Barnes’s affidavit attesting to his testimony is attached to this Motion.
3. Sunrun and ReVision contacted all parties regarding the submission of Mr. Barnes’s testimony via affidavit and asked whether any party would have any questions for Mr. Barnes. No party objected and all parties waived the opportunity to cross-examine Mr. Barnes.
4. If any questions do arise at the Settlement Hearing, Sunrun and ReVision can provide additional information in response to written records requests.
5. While Sunrun and ReVision do not object to the proposed settlement agreement filed by the settling parties on November 19, 2018 (“Settlement Agreement”),

Sunrun and ReVision are not signatories to the Settlement Agreement.

6. Sunrun and ReVision respectfully request an opportunity to submit a written closing statement within a reasonable time as determined by the Commission upon the conclusion of the Settlement Hearing.

WHEREFORE, Sunrun and ReVision request the Commission grant this motion to enter the testimony of Justin Barnes into the record as testimony in the above referenced docket and that the Commission grant parties the opportunity to submit written closing statements following the conclusion of the hearing.

Respectfully submitted,

/s/ Beren Argetsinger

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Dated this 27th day of November 2018.

CERTIFICATE OF SERVICE

RE: Docket No. DE 17-189 Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, Petition to Approve Battery Storage Pilot Program

I hereby certify that I have this day served a true copy of the **Motion to Enter Testimony of Justin R. Barnes into the Record and Request to Submit Written Closing Statement** upon parties of record on the attached service list in accordance with the requirements of N.H. Admin. Rule Puc 203.11.

Dated: November 27, 2018.

/s/ Blake Elder

Blake Elder
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SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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