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October 17, 2019

Via Electronic Mail and Hand-Delivery

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

**Re: Docket No. 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, enclosed for filing in the above matter are, first, an original and six copies of a *Motion to Extend until February 28, 2020 the Deadline to Install the First 100 Batteries*.

Second, Order No. 26,209 (Jan. 17, 2019), which approved the settlement agreement in the above docket, also imposed the following cybersecurity requirements:

We therefore require that, before Phase 1 of the pilot is implemented, Liberty complete a comprehensive evaluation of the cybersecurity risks raised by the battery storage pilot program, including both firmware and software elements, and confirm there are no cybersecurity risks for manipulation of electrical usage, access to customer personal protected information, or unauthorized alteration of equipment performance or settings. In addition, an evaluation of the relevant vendors' practices must be completed by Liberty and deemed to be sufficient. Liberty's Cybersecurity Plan must also clearly outline the measures, detection methods, and mitigation strategies that it plans to implement regarding integration of utility-owned equipment and systems installed behind-the-meter at customers' premises prior to program implementation. Liberty must file [1] a written certification signed by Mr. Eck, and also by a senior executive responsible for cybersecurity initiatives, confirming that such evaluations have been completed and conclusions reached, [2] together with documentation describing in reasonable detail the supporting methodologies used in such determinations and

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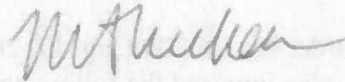
[3] include with a copy of its amended Cybersecurity Plan. The filing of Liberty's Cybersecurity Plan may be submitted confidentially pursuant to Puc 201.06(a)(16). A similar certification and filing must be submitted each year during the full-term of the pilot program.

Order at 40 (emphasis and bracketed numerals added).

In compliance with these requirements, first, enclosed are seven copies of the *Tesla Energy Cybersecurity Memorandum*, which is the certification signed by Mr. Eck and Mr. Lowson "confirming that such evaluations have been completed and conclusions reached." Second, the Company will make available to appropriate parties, on request, the "documentation describing in reasonable detail the supporting methodologies used in such determinations." And third, Liberty will amend its Cybersecurity Plan to "clearly outline the measures, detection methods, and mitigation strategies that it plans to implement regarding integration of utility-owned equipment and systems installed behind-the-meter at customers' premises prior to program implementation," which changes will closely track the work done as part of the Tesla cybersecurity review. Liberty will file the amended cybersecurity plan before program implementation.

Thank you.

Sincerely,



Michael J. Sheehan

cc: Service List
Enclosures