

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 until February 28, 2020, the Deadline to Install the First 100 Batteries.

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 batteries until February 28, 2020, because the cybersecurity process with Tesla, now complete, took longer than expected.

In support of this motion, Liberty represents as follows:

1. The Settlement Agreement in this docket, approved by Order No. 26,209 (Jan. 17, 2019), stated:

Within nine (9) months following Commission approval of this settlement, at least 100 batteries shall have been installed and become fully operational and available for Liberty to control and dispatch. No batteries shall be installed in Phase 1 of the program later than twelve (12) months following Commission approval of this settlement.

Settlement Agreement, at Bates 7. The nine month period expires in October 2019.

2. The Company has been unable to begin the installation process because the cybersecurity discussions between Liberty and Tesla, a necessary prerequisite for all other work, took many months of negotiation and careful work, and was just completed. The Company understands that this was the first time Tesla had been asked to perform the

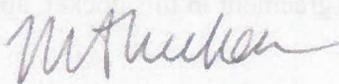
review and third-party auditing that Liberty requested in this instance. Both Liberty and Tesla are pleased with the result, but it was a substantial project for both companies.

3. The Company sees no further barriers and has begun working toward installation. The Company is confident that the new, proposed deadline of February 28, 2020, can be met. Of course, the deadline for installing batteries during Phase 1 would have to move a corresponding amount of time, to May 31, 2020.

WHEREFORE, Liberty respectfully asks that the Commission:

- a. Extend the deadlines for Liberty to install the first 100 batteries until February 28, 2020, and to install the last of the batteries by May 31, 2020; and
- b. Grant such other relief as is just and reasonable.

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



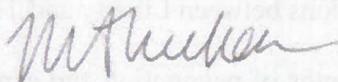
Date: October 17, 2019

By: _____

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Certificate of Service

I hereby certify that on October 17, 2019, a copy of this motion has been electronically forwarded to the service list.



By: _____

Michael J. Sheehan