

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DE 17-189

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

Petition to Approve Battery Storage Pilot Program

Motion for Remote Participation

Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, through counsel, respectfully moves the Commission pursuant to Puc 203.07 to allow for remote participation of (1) Kevin Joyce from Tesla, (2) Kajal Gaur from Guidehouse, Inc., and (3) Dmitry Balashov from Liberty.

In support of this motion Unutil states the following:

1. On September 26, 2022, the Commission issued a procedural order that granted the Company's request to continue the previously scheduled hearing on Phase One of the battery storage pilot to allow for the preparation and filing of the Interim Evaluation Report on Phase One of the pilot program that is the subject of this docket. The Company timely filed the report on November 29, 2022, prepared by the Company's consultant, Guidehouse, In.
2. The procedural order set the new hearing date of January 10, 2023, and asked Liberty to make available a witness from Tesla "to respond to any questions that may arise regarding the physical and technological capabilities of Tesla products and software utilized in the Program."
3. Liberty now requests permission for the Tesla representative and two other witnesses to appear remotely at the January 10 hearing.
4. Kevin Joyce, Staff Product Manager, Aggregation Programs at Tesla, is based on the west coast. Mr. Joyce will be prepared to answer questions regarding the physical and technological capabilities of the Tesla products and software used in the program. Liberty requests permission for Mr. Joyce's remote participate due to the limitations in his schedule and the costs Liberty would incur to have Mr. Joyce travel to New Hampshire.
5. Kajal Gaur, an analyst at Guidehouse and who is based in Massachusetts, assisted in the preparation of the Preliminary Report. To minimize the costs to be incurred for this

hearing, and due to restrictions in Mr. Gaur's schedule, Liberty asks that Mr. Gaur be allowed to appear remotely. Note that the Guidehouse principal on the Preliminary Report, Samuel Crawford, will appear in person. Mr. Gaur's presence will be in support of Mr. Crawford's live appearance.

6. Dmitry Balashov is Liberty's Senior Director of Grid Modernization and is based in Liberty's corporate office in Oakville, Ontario, Canada. Mr. Balashov is responsible for grid modernization efforts at Liberty affiliates across the country and is thus responsible for the battery storage pilot. Liberty does not plan to have Mr. Balashov testify about the program or phase one report, but his presence may be helpful should the Commission have questions that fall within the scope of his role at Liberty. Note that Liberty will present in person witnesses who are familiar with the pilot. Liberty requests permission for Mr. Balashov's remote participation to avoid the time and expenses that would be involved with his travel to New Hampshire.
7. As noted above, Liberty will also have several in-person witnesses from Liberty and Guidehouse at the January 10 hearing.

WHEREFORE, Liberty respectfully requests that the Commission:

- (1) Allow Mr. Joyce, Mr. Gaur, and Mr. Balshov to participate in the January 10, 2023, hearing remotely; and
- (2) Order such further relief as may be just and equitable.

Respectfully submitted,

Liberty Utilities (Granite State Electric) Corp., d/b/a
Liberty
By its Attorney,



Date: December 30, 2022

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Certificate of Service

I hereby certify that on December 30, 2022, a copy of this motion has been electronically forwarded to the service list in this docket.

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan