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November 22, 2024

Via Electronic Mail Only

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

**Re: Docket No. DE 22-060; Electric Distribution Utilities
Consideration of Changes to the Current Net Metering Tariff Structure**

Dear Chairman Goldner:

In Order No. 27,074 (Nov. 18, 2024), the Commission approved the Joint Utilities' proposal for interconnection fees, effective January 1, 2025, and approved the collection of those fees through an appropriate mechanism that reconciled the fees collected against the incremental administrative costs incurred, as presented in Attachment C to Exhibit 1. Order at 29 and 33. The order stated that "Liberty shall file notice to the Commission of which existing rate mechanism it intends to file for its annual reconciliation of the interconnection fees within five days of this order." Order No. 27,074 at 33.

On behalf of Liberty Utilities (Granite State Electric) Corp., I write to respectfully request that the Commission allow the Company to delay application of the interconnection fees and implementation of the associated reconciling mechanism due to changes in circumstances, to be revisited when Liberty expects to incur incremental administrative expenses.

At the time the interconnection fees were proposed in the Joint Utility Testimony, Liberty was in the midst of a significant increase in the number of applications, rising from 126 applications in 2021 to 328 applications in 2022, and up to 351 received through the filing of testimony in July 2023. Exhibit 2 at page 9. And as reflected in the attached February 20, 2024, response to DOE data request 4-7, the number of applications had grown from 65 in 2018 to 628 for the full 2023 year.

Based on this annual growth rate, Liberty projected in that same data response that it would receive 1,226 applications in 2024 and 2,467 applications in 2025. However, applications in 2024 have dropped well below what had been predicted. Liberty has received only 283 applications to date in 2024. Therefore, Liberty believes that it is adequately equipped to manage the current pace of new applications without the need for additional administrative resources and a corresponding reconciling rate component at this time.

Daniel Goldner, Chair
November 22, 2024

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael J. Sheehan

Cc: Service List
Attachment