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December 12, 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:

On behalf of Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, I write in response to the Commission's request in Order No. 27,085 (Dec. 6, 2024) that the utilities provide timeframes to respond to each of the Commission's 12 information requests issued on November 25, 2024. At this point, Liberty believes it will be able to respond to all information requests by the existing December 20, 2024, deadline except for Information Requests 2, 8 and 11.

Request 2, which seeks "a list of all customer-generators currently enrolled in your company's net-metering program", including many details of these customers' generation and consumption. Responding to this request requires Liberty to pull, verify, and format a large amount of data in a manner that the Company does not routinely undertake. It is difficult to estimate the amount of time necessary to provide a response to Request 2, but the Company commits to providing that information within the six-week extension proposed for Request 11 below. And the Company will certainly provide the information earlier if available.

The Company respectfully asks for clarification regarding Information Request 8, which states:

8. What changes are necessary for the metering infrastructure to accommodate net metering customers' ability to leverage electricity storage and more instantaneous netting, ideally five-minute intervals or faster, to allow such customers to extract benefits from away and production towards peak demand periods?

(Emphasis added.)

It is Liberty's understanding that net metering is not currently available to customers with storage because of the difficulty in determining whether the stored energy was produced by a renewable source (the discharge of which could be eligible for net metering) or was taken from the grid (which is not eligible for net metering). Recall that the Commission granted an exception to this general rule in Liberty's battery storage docket, which exception was grounded in Liberty's assurance that Liberty (and not the customer) retained control the discharge of the batteries at all times. Order

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No. 26,784 at 6 (Mar. 15, 2023). Given Liberty's understanding that storage cannot participate in net metering at this time, Liberty respectfully seeks clarification of Information Request 8.

Finally, Information Request 11 states:

11. If the netting is changed to hourly netting for small customer-generators for the energy component, please explain what changes the utilities will need to make to the metering infrastructure and estimate the cost to implement each change. Also explain what changes will be required if the netting for small customer-generators for the energy component is changed to five-minute netting.

Liberty would have to make system changes to allow for hourly (or instantaneous) netting for small customer-generators. It will take up to six weeks for Liberty to determine the necessary system changes and to develop a cost estimate for those changes. Therefore, Liberty respectfully asks the Commission to extend the deadline for this response (and for Information Request 2 above) until January 31, 2025

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan".

Michael J. Sheehan

Cc: Service List