



**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 16-864

Methodology for Billing Net Metered Customers-Rate G-1

**DIRECT TESTIMONY
OF
HEATHER M. TEBBETTS**

December 28, 2016

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1 **I. Introduction and Qualifications**

2 **Q. Please state your full name, business address and position.**

3 A. My name is Heather M. Tebbetts and my business address is 15 Buttrick Road,
4 Londonderry, NH 03053. I am a Utility Analyst for Liberty Utilities Service Corp.
5 (“Liberty”) which provides services to Liberty Utilities (Granite State Electric) Corp.
6 (“Liberty Utilities” or “the Company”) and in this capacity, am responsible for providing
7 rate-related services for the Company.

8 **Q. Please describe your educational background and training.**

9 A. I graduated from Franklin Pierce University in 2004 with a Bachelor of Science degree in
10 Finance. I received a Master’s of Business Administration from Southern New
11 Hampshire University in 2007.

12 **Q. Please describe your professional background.**

13 A. In October 2014 I joined Liberty as a Utility Analyst. Prior to my employment at
14 Liberty, I was employed by Public Service Company of New Hampshire (“PSNH”) as a
15 Senior Analyst in NH Revenue Requirements from 2010 to 2014. Prior to my position in
16 NH Revenue Requirements, I was a Staff Accountant in PSNH’s Property Tax group
17 from 2007 to 2010 and a Customer Service Representative III in PSNH’s Customer
18 Service Department from 2004 to 2007.

19 **Q. Have you previously testified before the New Hampshire Public Utilities
20 Commission (“the Commission”)?**

21 A. Yes, I have testified on numerous occasions before the Commission.

1 **II. Purpose of Testimony**

2 **Q. What is the purpose of your testimony?**

3 A. Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (“the Company”) or
4 (“Liberty”) provides distribution service to its largest customer base under time-of-use
5 Rate G-1. Customers who take service under this rate pay on-peak and off-peak prices
6 for power taken during on-peak and off-peak periods. These customers do not have the
7 net metering program available to them at this time because the Company does not have
8 an approved methodology for billing a time-of-use rate under Puc 900.

9 Puc 903.02(p) provides:

10 *Pursuant to Puc 203, upon petition by a utility or on its own motion, the*
11 *commission shall by order, after notice and hearing, establish on a*
12 *utility-specific basis a methodology by which customer-generators may*
13 *be provided service under time-based net energy metering tariffs*
14 *provided that it determines the resulting rates are just and reasonable*
15 *and in accordance with RSA 362 A:9, VIII.*

16 The Company is requesting that the Commission review and approve a methodology for
17 Liberty to bill customer-generators taking net metered service under its Rate G-1 to allow
18 for time differentiation of the credit for excess generation.

19 **III. Proposal**

20 **Q. Please provide an overview of Rate G-1.**

1 A. Liberty's Rate G-1 applies to customers taking delivery service if the Company estimates
2 its average use will be greater than or equal to 200 kilowatts (kW) of demand in a billing
3 month. This rate is a time-of-use rate that charges customers for on and off-peak energy
4 use. The periods of on-peak include Monday through Friday, 8:00 AM to 9:00 PM daily.
5 Off-peak periods are Monday through Friday from 9:00 PM to 8:00 AM, all day
6 Saturday, Sunday and the holidays listed in the tariff.

7 Customers taking service under this rate have interval metering. Therefore, the amount
8 of energy (kWh) imported and exported by such customers under who are net metered
9 can be determined on a time-differentiated basis. Customers who install systems meeting
10 the net metering requirements under Puc 903.02(f) and taking service under Rate G-1
11 will be billed in accordance with Rate G-1 in the Company's tariff.

12 **Q. What is the methodology Liberty is proposing for customer-generators taking**
13 **service under Rate G-1?**

14 A. The Company is proposing a methodology for customer-generators taking service under
15 Rate G-1 where kWh exported during on-peak hours will be credited to on-peak imported
16 kWh (net consumption) in the customer's future bills. Correspondingly, kWh exported
17 during off-peak hours will be credited to off-peak imported kWh in the customer's future
18 bills.

19 The other rate components on a customer's bill (energy service, transmission, stranded
20 costs, electricity consumption tax, and system benefits charge) do not employ time-of-
21 use, so they are not affected by Puc 903.02(p).

1 **Q. Is the Company proposing new tariff language at this time?**

2 A. Yes, Attachments HMT-1 and HMT-2 are the red-line and clean versions of the proposed
3 tariff language.

4 **IV. Conclusion**

5 **Q. Please summarize Liberty's proposal.**

6 A. Liberty requests that the proposal to implement the net metering time-of-use
7 methodology for customer-generators taking service under Rate G-1 be approved by the
8 Commission as filed. This methodology provides for a reasonable crediting of excess
9 kWh based on the time of day during which such excess kWh are produced, thus
10 reducing any potential inequity that could result through an arbitrary crediting of excess
11 generation.

12 **Q. Does this conclude your testimony?**

13 A. Yes.