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October 18, 2021

***Via Electronic Mail Only***

Dianne Martin, Chairwoman  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

**Re: Docket No. DE 19-064; Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty  
Petition for Permanent Rates**

Dear Chairwoman Martin:

On July 1, 2021, the Commission issued Order No. 26,494 which denied the Company's request to implement that part of the step increase related to the battery storage program, stating the following:

Third, we requested additional information related to the Battery Pilot Program during the hearing (Exh. 80 has been reserved for the response). For purposes of this step adjustment, we exclude the Battery Pilot Program investment adjustment until the requested information has been received and reviewed,<sup>1</sup> and will consider recovery in a future rate case.

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<sup>1</sup> Note that Commission stated at hearing that the information to be provided in Exhibit 80 was not necessary to determine the prudence of the battery-related costs at issue:

[Sheehan] I think that that information may not affect this particular case, the resolution of it. So I wonder if the Commission is looking for it prior to order, or whether if it comes in sometime after that would be acceptable.

Dianne Martin, Chairwoman

October 18, 2021

Order at 6-7.

The Company filed Exhibit 80 on July 15, 2021.

On August 29, 2021, the Commission issued Order No. 26,512 which, *inter alia*, found Exhibit 80 to be insufficient and established the following process for consideration of those costs:

Therefore, we will review the 2020 battery pilot investment to determine whether it was prudent, used, and useful and should be included in rate base, and the appropriateness of a rate adjustment, following receipt of a conforming Exhibit 80.

Order 26,512 at 8. The Company filed a conforming version of the exhibit, titled Exhibit 80A, on September 16, 2021.

Given this filing, and given that all relevant evidence related to prudence was examined at the June 24, 2021, hearing, the Company respectfully asks the Commission to approve recovery of the battery pilot investments, to be included in rates as of November 1, 2021.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this filing will be provided. Thank you.

Sincerely,



Michael J. Sheehan

Cc: Service List

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CHAIRWOMAN MARTIN: Commissioner Goldner, did you have a timing on that? Are you okay if it comes in after the order is needed in this case?

COMMISSIONER GOLDNER: I think that would be fine, yes.

Transcript of June 24, 2021, hearing at 179.