

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty

DE 19-064  
Distribution Service Rate Case  
Step Adjustment

Staff Data Requests - Set 11

Date Request Received: 6/11/21  
Request No. Staff 11-4

Date of Response: 6/21/21  
Respondent: Heather Tebbetts

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**REQUEST:**

Refer to Attachment Staff 10-1h, regarding costs incurred by Tesla.

- a. Please provide an itemized list and the associated cost for the costs listed for Tesla.
- b. Please explain why \$1,245,000 is listed for Tesla, but yet the total vendor cost is less than this amount.
- c. Please explain whether all of the battery costs, installation costs, software costs, and other associated costs charged by Tesla are for all the Phase I batteries and associated costs that were installed and operational in 2020. If not, please provide the total cost incurred by Tesla for just the batteries installed and operational in 2020.
- d. Please provide an itemized list and the associated cost for just the batteries installed and operational in 2020.

**RESPONSE:**

- a. This information has been provided to the PUC auditor as part of the audit in this case.
- b. The Company paid for 25 installations at a time and, by 12/31/2020, 75 installations had been paid for, but only 60 installations had been completed. The Company is only requesting recovery for the costs associated with 60 completed installations, or what was in service by 12/31/2020.
- c. All costs in this filing are associated with Phase 1, and only for battery installations in service during 2020.
- d. This information has been provided to the PUC auditor as part of the audit in this case.