

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

**DE 10-160**

**Investigation into Effect of  
Customer Migration on Energy Service Rates**

**Petition to Intervene  
of  
The New England Power Generators Association, Inc.**

**I. INTRODUCTION**

Pursuant to the Order of Notice issued by the Public Utilities Commission of New Hampshire (“PUC”) dated June 11, 2010, the New England Power Generators Association, Inc. (“NEPGA”) hereby respectfully files this timely Petition to Intervene in the above-captioned proceeding. NEPGA requests that all further correspondence, communications and other documents relating to this matter be served upon the undersigned.

**II. BACKGROUND**

PSNH filed a Petition in Docket 09-180 on May 4, 2010 requesting an adjustment to its energy service rates effective with service rendered on and after July 1, 2010. To address the issue of customer migration to third party suppliers, PSNH is requesting that a portion of its energy service costs be removed from the energy service rates and recovered through a non-bypassable charge to all PSNH ratepayers. In this Docket 09-180, the PUC issued an order of notice on May 28, 2010 stating that it would open a separate proceeding to address the issue of customer migration on energy service rates. Pursuant to its December 2009 Order in Docket 09-180, the PUC also examine the interplay of customer choice and migration issues with power procurement options for PSNH including current practices, competitive procurement through Request for Proposals (“RFPs”), purchasing through the spot market, or other market based options. The June 11<sup>th</sup> order of notice establishing Docket 10-160 opens the proceeding to examine these two issues.

**III. INTERVENTION OF NEPGA**

NEPGA is the largest trade association representing competitive electric generating companies in New England. NEPGA’s member companies represent approximately 26,000 megawatts of generating capacity throughout the region, and over 2,600 megawatts located in New Hampshire. NEPGA’s mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy.

NEPGA's member companies have been involved in the design and development of all of the competitive wholesale markets in the United States during the last ten years. In that time, markets, especially in the ISO-NE region, have developed the necessary framework to support robust competition. NEPGA is equally committed to the continued evolution of competitive wholesale markets, to further the economic and reliability benefits that markets can deliver to consumers and the economy as a whole.

New Hampshire's interest in promoting competitive, reliable and cost effective electricity are consistent with the interests of NEPGA and the New England region. In this proceeding, the Commission will be reviewing and ruling on matters pertaining to PSNH's procurement practices, and the processes it uses to procure energy and capacity purchases from the New England market, and whether these processes rely upon open, transparent and competitive procurement practices, allowing equal ability by any entity to compete to provide these services. As active generator participants in the ISO-NE markets, NEPGA's member companies have substantial and direct interests in the outcome of these proceedings, and those interests cannot be adequately represented by any other party in the proceeding.

#### **IV. CONCLUSION**

NEPGA hereby respectfully requests that the PUC consider its timely Petition to Intervene as submitted herein.

Respectfully submitted,



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