STATE OF NEW HAMPSHIRE BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DE 07-108 PSNH 2007 LCIRP

PETITION FOR INTERVENTION

NOW COMES Halifax-American Energy Company, LLC and hereby petitions the New Hampshire Public Utilities Commission for intervention in the above-captioned proceeding pursuant to RSA 541-A:32 and NH Code Admin. Rule Puc 203.17. In support of its Petition for Intervention, Petitioner says the following:

- 1. Halifax-American Energy Company, LLC ("HAEC") is a New Hampshire limited liability company created on July 30, 2007. HAEC is the New England agent for South Jersey Energy Company, a subsidiary of South Jersey Industries. South Jersey Energy Company is a registered competitive electric power supplier in New Hampshire
- 2. PSNH filed its 2007 Least Cost Integrated Resource Plan (2007 LCIRP) with the Commission on September 28, 2007. The LCIRP includes, inter alia, the following components: 1) electric energy and demand forecasts for delivery and energy services under high-, low- and base-case scenarios; 2) the resource balance over the planning period, including an assessment of PSNH's base-load, intermediate and peaking needs; 3) a systematic evaluation of reasonably available demand-side resources plus a description of the avoided cost methodology and associated avoided cost forecast used for evaluation purposes; 4) generic cost information relating to the construction or acquisition of new generation capacity; 5) a description of the process, including the results of any evaluations used by PSNH, to select the mix of demand-side and supply-side resources included in the resource plan; and 6) the resource plan with which PSNH proposes to fill the resource balance at the lowest cost.
- 3. The filing raises, <u>inter alia</u>, issues related to whether PSNH's planning process is consistent with RSA Chapter 374, Electric Utility Restructuring. The purpose of Chapter 374 is "to restructure the New Hampshire electric utility industry is to reduce costs for all consumers of electricity by harnessing the power of competitive markets." <u>RSA 374-F:1, I.</u>
- 4. As a competitive electric power supplier, has a substantial interest that may be affected by the Commission's deliberations in this proceeding as to whether PSNH's plan will hinder a competitive market in PSNH's service territory.

WHEREFORE, HAEC hereby respectfully requests the Commission to grant it party intervener party status and to order such other and further relief as may be just and equitable.

Respectfully submitted, HALIFAX-AMERICAN ENERGY COMPANY, LLC

By its Attorney

Isl James T. Rodier

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Certification of Service

Dated: January 21, 2008

Pursuant to Rules Puc 203.02(2) and Puc 203.11, I have served copy of this petition on each person identified on the commission's service list for this docket.

Isl James T. Rodier