

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DE 10-261

**PSNH
2010 Least Cost Integrated Resource Plan**

JOINT PETITION FOR INTERVENTION

NOW COME Freedom Logistics, LLC d/b/a Freedom Energy Logistics (“FEL”), and Halifax-American Energy Company, LLC (“HAEC”) and hereby jointly petition 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, Petitioners say the following:

1. On September 30, 2010, Public Service of New Hampshire (PSNH) filed its 2010 Least Cost Integrated Resource Plan (LCIRP) pursuant to RSA 378:37 and Commission Order No. 24,945 (February 27, 2009) in Docket No. DE 07-108, PSNH's prior LCIRP filing, and Order No. 25,061 (December 31, 2009).

2. The Commission issued an Order of Notice on November 3, 2010. According to the Commission, the filing raises, inter alia, issues related to whether PSNH's planning process is adequate as defined by the requirements set forth in RSA 378:38 and 39 and Order No. 24,945 and whether it is consistent with RSA Chap. 374-F and RSA 369-B:3a.

3. Petitions for Intervention, pursuant to RSA 541-A:32 and Rule Puc 203.17, must set forth the facts demonstrating that the petitioner's right's, duties, privileges, immunities, or other substantial interests may be affected by the proceeding, and that the interest of justice and the prompt and orderly conduct of the proceedings would not be impaired by allowing the intervention.

4. FEL is a licensed aggregator in five New England states specializing in providing high-end management services to end-users that are Market Participant End-Users (MPEU). An MPEU is a member of NEPOOL and ISO-NE that purchases electricity directly from the ISO-NE hourly wholesale market. Freedom Logistics pioneered the adoption of dynamic pricing in New England. There are currently numerous MPEU's located in New Hampshire that are clients of FEL, including St. Anselm College and the Union Leader.

5. HAEC, is an affiliate of Freedom Logistics. 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. Among HAEC's retail customers in New Hampshire include University of Southern New Hampshire and Stonyfield Farms.

6. Both FEL and HAEC have lengthy and substantial experience in offering dynamic pricing solutions in the New England retail market in general, and to New Hampshire customers in particular. August G. Fromuth is the chief executive officer of both entities. Mr. Fromuth currently serves as a Vice Chairman of the New England Power Pool Participants Committee and is currently Chairman of the NEPOOL End-Use Sector.

7. FEL and HAEC intend to propose alternatives and make recommendations with respect to PSNH's Least Cost Plan that would lower rates for PSNH's customers.

8. For the foregoing reasons, FEL and HAEC have substantial interests that will be affected by the Commission's deliberations in this proceeding.

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

Respectfully submitted,
FREEDOM LOGISTICS, LLC
HALIFAX-AMERICAN ENERGY COMPANY, LLC
By their Attorney,

Dated: November 12, 2010

/s/ James T. Rodier
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Certification of Service

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.

/s/ James T. Rodier