

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

**Petition by FREEDOM LOGISTICS, LLC, d/b/a FREEDOM ENERGY LOGISTICS for  
Authorization Pursuant to RSA 362-A:2-A, II for  
a Purchase of LEEPA Output by the Private Sector**

**Docket No. DE 15-068**

**UNITIL ENERGY SYSTEMS, INC.**  
**PETITION TO INTERVENE**

Unitil Energy Systems, Inc. (“Unitil” or “Company”) hereby respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) for full party Intervenor status in the above captioned matter pursuant to RSA 541-A: 32 and N.H. Code of Admin. Proc. Puc 203.17. In support of its Petition, Unitil states the following:

1. Unitil is a New Hampshire corporation and public utility primarily engaged in the distribution of electricity in the capital and southeastern seacoast regions of New Hampshire. Unitil’s primary place of business is located at 6 Liberty Lane West, Hampton, New Hampshire.

2. On February 17, 2015, Freedom Logistics, LLC d/b/a Freedom Energy Logistics (“FEL”) filed a petition seeking a determination by the Commission regarding whether FEL’s agreement to purchase the output generated by Fiske Hydro, Inc. and net such output against FEL’s total usage recorded on its meter with Public Service Company of New Hampshire d/b/a Eversource Energy is consistent with RSA 362-A:2-A, II. The Commission has opened this docket to consider FEL’s request.

3. RSA 541-A:32 provides that a petition to intervene shall be granted if: (b) The petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law and (c) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

4. Unitil's retail rates are regulated by the Commission, as are the Company's obligations to transmit or purchase power from a limited electric producer pursuant to RSA 362-A:2 and -A:3, and tariffs providing for net energy metering available to eligible customer-generators under RSA 362-A:9. Many of the issues raised or which may be raised in this docket may be applicable to Unitil in a subsequent proceeding. Therefore, any action the Commission may take with respect to FEL's filing may impact the rights, duties and interests of Unitil or its customers. These interests are substantial and are not adequately represented by any other party to this proceeding.

5. Granting of Unitil's Petition for Intervention would not impair the orderly and prompt conduct of the proceedings. In the interest of administrative efficiency, Unitil will attempt to coordinate its participation with that of other electric utilities which are parties to this docket, to the extent that the interests and positions of Unitil and these parties align.

6. Unitil has contacted counsel for FEL and has been advised that FEL does not object to Unitil's petition to intervene.

WHEREFORE Unitil respectfully requests that the Commission grant its Petition to Intervene and such further relief as may be just and equitable.

Respectfully submitted,



By: \_\_\_\_\_

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Petition to Intervene was sent by e-mail to the following parties:

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Dated: May 4, 2015

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Gary Epler