

THE STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DE 18-002
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
2018 Energy Service Solicitation and Senate Bill 365

NEW ENGLAND RATEPAYERS ASSOCIATION
PETITION TO INTERVENE

Pursuant to the Commission's Supplementary Order of Notice dated December 11, 2018 ("Supplemental Order") N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32 (I)b, the New England Ratepayers Association ("NERA") respectfully submits this Petition for Intervention in the above-referenced docket.

In support of this petition NERA states:

1. NERA is a non-profit, social welfare organization which advocates for the interests of ratepayers throughout New England. Our members are individuals and businesses in New Hampshire in and the other five New England states who are concerned about the high costs of electricity in the region and its impact on our economy.
2. NERA has been an active participant in legislative and regulatory hearings related to electricity, natural gas and telecommunications issues in New Hampshire and has been a vocal opponent of policies that increase the cost of electricity to ratepayers.
3. NERA was active in the Senate Bill 365 legislative process, passage of which led to NERA's Petition of Declaratory Order ("PDO") at the Federal Energy Regulatory Commission ("FERC") and subsequently the Commission's Supplemental Order.
4. As the organization that filed the PDO (Docket EL-19-10-000) at FERC requesting that FERC find that Senate Bill 365 is pre-empted by the Federal Power Act ("FPA") and in violation of the Public Utility Regulatory Policies Act ("PURPA"), that resulted in the Supplemental Order, NERA has a unique interest in this docket which cannot be represented by any other party.
5. NERA has New Hampshire members in Eversource's Service Territory that will be impacted by the Commission's Docket 18-002. Specifically, how the Commission responds to Eversource's default service solicitation specific to RSA 362-H:2, III created by passage of SB 365; and NERA's filing of the PDO at FERC.

6. NERA's participation in this docket is in the interest of justice and would not disrupt the orderly and prompt conduct of this proceeding. If granted intervenor status, NERA will abide by the Commission's rules and procedural schedule developed in this docket and make every effort to work collaboratively with the Staff and other parties.

WHEREFORE, the New England Ratepayers Association respectfully requests that it be granted full intervenor status for this proceeding.

Respectfully submitted,

Marc Brown
President, New England Ratepayers Association

Dated: December 17, 2018



New England Ratepayers Association

Certificate of Service

I hereby certify that on December 17, 2018 that seven hard copies of the foregoing petition were sent to the Public Utilities Commission, one hard copy was sent to the Office of the Consumer Advocate, and an electronic copy was sent to all parties on the Service List of DE 18-002.

Marc I. Brown
President, New England Ratepayers Association