

**STATE OF NEW HAMPSHIRE**  
**BEFORE THE**  
**PUBLIC UTILITIES COMMISSION**  
**ELECTRIC AND NATURAL GAS UTILITIES**

Development of a Statewide, Multi-Use Online Energy Data Platform

Docket No. DE 19-197

Petition of Freedom Logistics, LLC for Intervention

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission on December 13 in the above-captioned proceeding, N.H. Code Admin. Rules Puc 203.17, and RSA 541-A:32, Freedom Logistics, LLC hereby petitions for leave to intervene in this matter. In support of its petition, Freedom Logistics, LLC states as follows:

Rule Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32. RSA 541-A:32, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon a showing that the petitioner has “rights, duties, privileges, immunities or other substantial interests” that may be affected by the proceeding, and “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

According to the Order of Notice, this docket concerns the development, implementation, and maintenance of a statewide, multi-use online energy data platform in accordance with RSA 378:50 through :54 (as enacted earlier this year as 2019 N.H. Laws Ch. 286, and as proposed by SB 284); issues relating to privacy policies for customer data in accordance with RSA 363:37 and :38; issues relating to the availability and transmittal of aggregated community-level energy usage data pursuant to RSA 53-E:4; and the question of whether the cost of the platform to be

recovered from customers is reasonable and in the public interest (or, alternatively, whether implementation of the platform should be deferred). For the reasons that follow, these determinations may impact the rights, duties, privileges, immunities, or other substantial interests of Freedom Logistics, LLC.

Freedom Logistics, LLC is New Hampshire's largest energy procurement consultant working with a wide range of commercial, industrial, institutional and municipal clientele. The majority of our New Hampshire customers are located within the Eversource territory and, since our founding in 2006, the lack of immediate and reliable access to our clients' data has been a significant hinderance to the progress of New Hampshire's energy market and the scope of services we and other consultants can provide.

Freedom Logistics, LLC has a vested interest in the outcome of this docket in that we will be able to provide higher level services and data reporting to our clients should they have free, unfettered and immediate access to their electricity portfolio (i.e. consumption profiles, time of use, demand, history, etc...).

WHEREFORE, Freedom Logistics, LLC respectfully request that this honorable Commission:

- A. Grant the petition for intervention, and
- B. Provide any other such relief as it deems appropriate.

Sincerely,



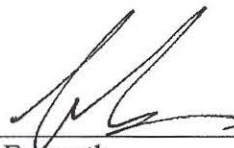
---

Bart Fromuth  
Chief Operating Officer  
Freedom Logistics, LLC  
5 Dartmouth Dr. Suite 301  
Auburn, NH 03032  
6036252244  
Bart.Fromuth@felpower.com

1/9/2020

Certificate of Service

I hereby certify that a copy of this Petition for intervention was provided via electronic mail to the individuals included on the Commission's service list for this docket.



---

Bart Fromuth