

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

CITY OF LEBANON PETITION TO INTERVENE

Now Comes the City of Lebanon (“City”) and petitions the New Hampshire Public Utilities Commission, in response to its Order of Notice issued on December 13, 2019 in this proceeding and pursuant to NH Code of Administrative Rules Puc 203.2 and Puc 203.17 and NH RSA 541:A:32, to allow the City to intervene in the above-captioned matter for the following reasons:

1. The City is a municipal corporation with an address of 51 North Park St., Lebanon, NH 03766.
2. The City is an electric customer of Liberty Utilities with approximately 85 meters and accounts with Liberty at G1, G2, G3 and M01 rates and consumes about 4 million kWh per year.
3. The City has participated in or is a party in DE 16-383, Liberty Utilities previous electric distribution rate case, DE 19-064, Liberty’s current distribution rate case, IR 15-296 regarding Grid Modernization, DE 16-576 regarding alternative net metering tariffs, and DE 17-189, Liberty’s battery and time-of-use (TOU) rate pilot. Energy and customer data have been issues to varying degrees in most of these proceedings. The City proposed a real time pricing pilot in DE 16-576 that the Commission gave preliminary support for in Order No. 26,029. There are still significant unresolved customer and meter data issues to be addressed to move that pilot forward.
4. The City has taken the first step under RSA 53-E in designating a electric aggregation committee to develop a plan for a planned municipal aggregation to supply energy

service to City electric customers. The development and implementation of community power aggregation has significant issues to be addressed concerning customer data.

5. The City was actively involved in helping draft and pass last session's SB 78, an act relative to public utility customer data that amended RSA 363:37-38 and SB 286 that updated RSA 53-E; both of which became law in 2019.
6. The City has a substantial interest in the issues to be addressed by this docket and the City's intervention will not impair the orderly and prompt conduct of the proceedings, will not result in undue delay, and will not prejudice the interest of any party.

WHEREFORE, the City of Lebanon requests that the Commission grant this petition to allow the City to be made a full intervenor in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted this 29th day of January 2020

City of Lebanon



by Assistant Mayor Clifton Below, duly authorized