

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 Packetized Energy Technologies, Inc for Intervention

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission on December 13, 2019 in the above-captioned proceeding, N.H. Code Admin. Rules Puc 203.17, and RSA 541-A:32, Packetized Energy Technologies, Inc. (“Packetized Energy” or “Packetized”) hereby petitions for leave to intervene in this matter. In support of its petition, Packetized 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 of a statewide, multi-use online energy data platform pursuant to Senate Bill 284 and in accordance with RSA 378:50 through :54 (as enacted last 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 certain energy usage data pursuant to RSA 53-E:4; and the question of whether the cost of the platform recovered from customers is reasonable and in the public interest (or else whether implementation of the platform should be deferred). This docket also concerns privacy policies and aggregated community-level energy data. As explained below, the

determinations of this docket may impact the rights, duties, privileges, immunities, or other substantial interests of Packetized Energy.

Packetized Energy is an energy technology company that works to make electricity clean, affordable and easy to use through grid-edge flexibility. This means enabling energy devices that are located in homes and businesses to solve problems in the electricity system, to support the growth of renewable energy and to support the beneficial electrification of energy services. Our software and hardware products enable distributed energy resources such as water heaters, EV chargers, and smart thermostats to react dynamically to real-time grid conditions to maintain a balanced and reliable grid. Furthermore, and importantly related to this docket, Packetized Energy is working on technology that helps electric utilities and electricity industry stakeholders to plan for rapid changes in electricity systems that are occurring with the rapid growth of renewables and the growth of distributed energy resources, such as rooftop solar systems. Together these products allow utilities to avoid costly upgrades and keep costs low in the changing electricity industry. As a group of researchers, engineers, experts in the energy efficiency space, and energy policy specialists we see tremendous value in the proposed online data platform and are here to voice our support for this effort.


Packetized Energy's primary customers are electric utilities, who increasingly need to transfer large amounts of data among diverse software systems using standardized application programming interfaces ("APIs"). Given that we have a number of potential data-intensive projects launching in New Hampshire this year, the outcomes of the present docket will affect our business operations. Specifically, we anticipate that these projects will require us to make use of the state-wide data sharing platform in order to serve these customers. Packetized Energy is seeking to provide guidance related to New Hampshire's data platform based on extensive institutional and individual experience with utilities in many jurisdictions throughout the country. We hope to have input on technical standards, third-party access, cybersecurity and privacy, and the needs of DERs or "data consumers."

Packetized Energy's CEO Paul Hines has a background in electric power grid modeling and electricity markets and with a PhD in engineering and public policy from Carnegie Mellon, has focused his career on solving problems in electric power systems. Dr. Hines is co-inventor of the core technology of Packetized Energy. With previous work as a Professor at the University of Vermont, as an electrical engineer at Black & Veatch and Alstom-ESCA and in research for the Federal Energy Regulatory Commission and US Dept. of Energy National Labs, he has built extensive relationships and expertise at all levels of the electricity industry. Dr. Hines' experience will help develop a detailed record in this docket, with a focus on lessons from experience in other jurisdictions. Dr. Hines seeks to participate in discovery and provide testimony in this proceeding.

WHEREFORE, Packetized Energy Technologies, Inc. respectfully request that this honorable Commission:

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

Sincerely,



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February, 2nd, 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.



Paul Hines