

**BEFORE THE PUBLIC UTILITIES COMMISSION
STATE OF NEW HAMPSHIRE**

DE 23-003

**LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.
d/b/a LIBERTY**

Proposed Purchase of Receivables Program

March 10, 2023

**COMMUNITY POWER COALITION OF NEW HAMPSHIRE
PETITION TO INTERVENE**

Now Comes the Community Power Coalition of New Hampshire (“CPCNH”) and petitions the New Hampshire Public Utilities Commission, in response to its Order of Notice, issued on February 2, 2023, in this docket and pursuant to NH Code of Administrative Rules Puc 203.02 and Puc 203.17, to allow CPCNH to intervene in the above-captioned matter for the following reasons:

1. CPCNH is a voluntary New Hampshire nonprofit corporation with a principal place of business of City Hall, 51 North Park St., Lebanon, NH 03766 and a mailing address c/o Sustainability Director, Town of Hanover, 41 S Main Street, Hanover NH 03755
2. CPCNH is a governmental instrumentality of its 28 members comprised of 27 NH municipalities and one county and is organized pursuant to a joint powers agreement under NH RSA 53-A and 53-E:3, II(b). Two additional municipalities have just recently executed the JPA but have not yet been admitted as members by the Board of Directors of CPCNH.
3. The 2020 census population of CPCNH’s 27 municipal members is more than 21% of the state’s total 2020 census population.
4. CPCNH is in the process of standing up as a functioning joint power supply agency to procure and supply electricity and related services to member community power programs.
5. CPCNH is launching power supply for at least 10-member community power aggregations this spring pursuant to RSA 53-A and Puc 2200 rules.
6. Liberty serves CPCNH’s Member communities.

7. The JPA authorizes CPCNH “to jointly exercise certain powers, privileges, and authorities granted to municipalities and counties pursuant to” a variety of statutes “in order to study, promote, develop, conduct, operate, and manage energy-related programs, and to exercise all other powers necessary and incidental to accomplishing this purpose.” Article 7.16 of its Articles of Agreement, part of the JPA, specifically grants CPCNH the power to “[i]ntervene in germane regulatory proceedings on behalf of itself and its Members”.
8. CPCNH has a substantial interest in the issues to be addressed by this proceeding, due to its anticipated use of Liberty’s consolidated billing system and will soon be generating receivables from Liberty.
9. CPCNH’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, CPCNH requests that the Commission grant this petition to allow CPCNH to be made a full intervenor in this proceeding and grant such other relief as is just and proper.

Respectfully submitted this 10th day of March 2023

Community Power Coalition of New Hampshire



by CPCNH Chair Clifton Below, duly authorized