

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DOCKET NO. DE 23-039

**LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. d/b/a LIBERTY
Request for Change in Distribution Rates**

PETITION TO INTERVENE

Trustees of Dartmouth College (“Dartmouth” or the “College”) by and through their attorneys, McLane Middleton, Professional Association, submit this Petition to Intervene in the above-captioned proceeding pursuant to RSA 541-A:32, and Puc 203.17 and 203.02.

Dartmouth is a private, co-educational, residential college located in Hanover, New Hampshire. It enrolls approximately 4,400 undergraduates and 2,100 graduate students and currently has approximately 950 faculty members and 3,300 administrative staff. Dartmouth maintains and operates approximately 300 buildings, including lecture halls, dorms, and other facilities. Liberty Utilities Corp. (“Liberty”) provides electric service to Dartmouth’s main campus and local facilities across 175 different accounts. Presently, Dartmouth is undertaking a significant decarbonization plan.

On May 5, 2023, Liberty filed a Petition for Permanent and Temporary Rates (“Petition”) seeking an approximately 30 percent increase in its distribution revenues effective July 1, 2023, including changes to various delivery rates and other charges. On May 26, 2023, the New Hampshire Public Utilities Commission (“PUC” or “Commission”) issued Order No. 26,829, commencing an adjudicative proceeding, as well as scheduling a prehearing conference for June 15, 2023, and setting June 9, 2023, as the deadline for filing petitions to intervene.

RSA 541-A:32 provides, among other things, that the presiding officer of an agency shall grant a petition for intervention if it demonstrates that the “petitioner’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” Inasmuch as Dartmouth is a General Service Time-of Use Rate G-1 and General Service Rate G-3 electric customer of Liberty, the College’s rights would be affected by the proceeding.

Dartmouth’s substantial interests as a time-of-use customer may be affected by Liberty’s rate modernization strategy as described in the testimony of Gregory Tillman, Liberty’s Senior Manager of Rate Design, and Dartmouth’s substantial interests in efficient load management and electrification of its energy usage may be affected by updated time-of-use rates that, in the words of Liberty President Neil Proudman “give customers the ability to lower their rates when they change their usage patterns [and] facilitate further customer investments in DERs [Distributed Energy Resources] and decarbonization while also lowering bills.”

As required by Commission Order No. 26, 289, this Petition to Intervene is being filed on or before June 9, 2023, and is therefore timely filed consistent with RSA 541-A:32, I (a). Moreover, because this Petition to Intervene is being filed in advance of the scheduled prehearing conference, as required by RSA 541-A:32, I (c), the interests of justice and the orderly and prompt conduct of the proceeding will not be impaired by allowing Dartmouth’s intervention.

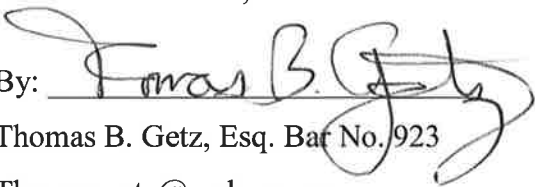
WHEREFORE, Trustees of Dartmouth College request that the Commission grant this
Petition to Intervene.

Respectfully Submitted,

Trustees of Dartmouth College

By its attorneys,

McLane Middleton, Professional Association

By: 

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Dated: June 9, 2023