

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

**DE 23-044**

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

**2023 Default Service Solicitations**

February 20, 2024

**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 Supplemental Order of Notice, issued on February 8, 2024, in this docket and pursuant to NH Code of Administrative Rules, Puc 203.17 and Puc 203.02, to allow CPCNH to intervene in the above-captioned matter for the following reasons:

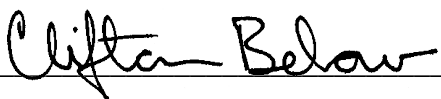
1. CPCNH is a voluntary New Hampshire nonprofit corporation with a principal place of business of 20 W Park Street, Suite 110, Lebanon, NH 03766 and a mailing address of P.O. Box 840, Concord, NH 03302.
2. CPCNH is a governmental instrumentality of its 55 members comprised of 53 NH municipalities and two counties and is organized pursuant to a joint powers agreement (JPA) under NH RSA 53-A and 53-E:3, II(b).
3. In April 2023, CPCNH began operation as a functioning joint power supply agency to procure and supply electricity and related services to member community power programs and is currently providing alternative default power supply service to 16 municipal members serving more than 91,000 customers as of meter reads at the end of November 2023. Of the more than 91,000 customers statewide, about 12,970 are in Liberty’s service territory spanning across 5 communities including Enfield, Hanover, Lebanon, Plainfield, and Walpole.
4. Following the March 1, 2024 launch of 100 additional community power aggregation programs, CPCNH will become the second largest power supplier in New Hampshire, at least by customer count.

5. The JPA authorizes CPCNH “to jointly exercise certain powers, privileges, and authorities granted to municipalities and counties pursuant to” a number 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”.
6. CPCNH member communities, including the customers of Enfield, Hanover, Lebanon, Plainfield, and Walpole Community Power who are also customers of Liberty for distribution services and can choose between Lebanon and CPA default service have an interest in whether Liberty’s default service procurement process should be modified in accordance with its proposal; whether its proposal is consistent with the principles elucidated in prior Commission orders regarding Liberty’s default service procurement process as well as the Electric Utility Restructuring Policy Principles governing default service in RSA 374-F:3, V(c)-(e); whether its proposal is consistent with the goal of cost-effectively meeting the state’s energy needs and reducing the burden on ratepayers; and whether the resulting rates would be just and reasonable as required by RSA 374:2, RSA 378:5, and RSA 378:7. Thus, CPCNH has a very substantial interest in the issues to be addressed in this proceeding.
7. 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 20<sup>th</sup> day of February 2024

*Community Power Coalition of New Hampshire*

  
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*by CPCNH Chair Clifton Below, duly authorized*

[Clifton.Below@CommunityPowerNH.gov](mailto:Clifton.Below@CommunityPowerNH.gov), 603 448-5899

Personal office: 1 Court St., Suite 300, Lebanon, NH 03766