

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

DE 23-063

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE
ENERGY,
LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP. d/b/a LIBERTY,
AND UNITIL ENERGY SYSTEMS, INC.**

**Petition for Waiver of Certain Provisions of the Puc 2200 Rules and
Request to Recover Costs of Implementing the Puc 2200 Rules**

August 4, 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 July 24, 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:

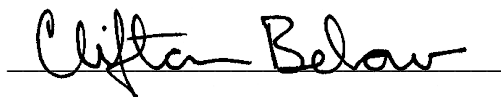
1. CPCNH is a voluntary New Hampshire nonprofit corporation with a principal place of business of City Hall, 51 North Park St., Lebanon, NH 03766 and a mailing address of P.O. Box 840, Concord, NH 03302.
2. CPCNH is a governmental instrumentality of its 36 members comprised of 35 NH municipalities and one county and is organized pursuant to a joint powers agreement (JPA) under NH RSA 53-A and 53-E:3, II(b).
3. The 2020 census population of CPCNH's 35 municipal members is more than 24% of the state's total 2020 census population.
4. CPCNH is now an operating joint power supply agency to procure and supply electricity and related services to member community power programs, having begun alternative default power supply service in 12-member community power aggregations (CPAs) this spring and now serving about 76,000 customers in all three investor-owned electric distribution utility territories (the Joint Utilities).

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. This proceeding directly affects the rights, duties, privileges, immunities or other substantial interests of CPCNH and its Members, such as what services and rates CPCNH may offer its customers, whether CPCNH can effectively and responsibly serve net metered customers, and the cost to serve those and other customers.
7. The proposed waivers of certain Puc 2200 rules for CPAs and questions around the Joint Utilities’ cost and need to comply with Puc 2204.16(d)(1) and recovery of costs to comply with the rules, appear to arise in part in response to CPCNH’s complaints against Eversource in PUC Docket # DE 23-062 and NH Department of Energy Complaint Proceeding # CPT 2023-002 and various questions that have arisen in our interactions with the Joint Utilities.
8. 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 8th day of August 2023

Community Power Coalition of New Hampshire

A handwritten signature in black ink, reading "Clifton Below", written over a horizontal line.

by CPCNH Chair Clifton Below, duly authorized