

**BEFORE THE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

PUBLIC SERVICE COMPANY OF NEW :
HAMPSHIRE D/B/A EVERSOURCE :
ENERGY PETITION FOR ADJUSTMENT : DOCKET NO. DE 24-112
OF STRANDED COST RECOVERY :
CHARGE FOR EFFECT ON FEBRUARY 1, :
2025 :

**RETAIL ENERGY SUPPLY ASSOCIATION
PETITION TO INTERVENE**

Pursuant to New Hampshire Revised Statutes Annotated 541-A:32 and New Hampshire Administrative Rules Puc 203.17, the Retail Energy Supply Association (“RESA”)¹ hereby petitions the New Hampshire Public Utilities Commission (“Commission”) to intervene in the above-captioned proceeding. In support of this petition, RESA states the following:

INTRODUCTION

1. On November 20, 2024, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) filed a Petition for Adjustment of Stranded Cost Recovery Charge (“SCRC”).²

2. On December 12, 2024, the Commission issued a Commencement of Adjudicative Proceeding and Notice of Hearing indicating that anyone seeking to intervene in the proceeding should do so by December 27, 2024.³

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

² Eversource Petition for Adjustment of Stranded Cost Recovery Charge for Effect on February 1, 2025 (Nov. 20, 2024) (“Petition”).

³ Commencement of Adjudicative Proceeding and Notice of Hearing (Dec. 12, 2024), at 7.

3. RESA now hereby petitions to intervene in the proceeding.

STANDARD

4. “The [C]ommission shall grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32.”⁴

5. The Commission must grant a petition to intervene if: (a) the petition describes how the petitioner is substantially and specifically affected by a proceeding; and (b) the intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding.⁵

INTERVENTION REQUEST

6. The procurement and pricing of utility commodity supply service has a direct and substantial effect on the competitive retail energy market.⁶ In fact, when considering whether utility commodity supply procurements are in the public interest, the Commission is required to ensure that those procurements do not cause undue harm to the competitive markets.⁷

7. Further, the recovery of stranded costs must be “consistent with the promotion of fully competitive markets.”⁸

8. Moreover, the Restructuring Act requires that customers be provided “clear price information on the cost components of generation, transmission, distribution, and any other ancillary charges.”⁹

⁴ N.H. Admin. Rules Puc 203.17

⁵ See RSA 541-A:32,I; see also RSA 541-A:32,II (granting the Commission discretion to grant a petition to intervene “upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings.”).

⁶ Cf. RSA 374-F:3,V(e) (requiring consideration of harm to competitive markets).

⁷ See *id.*; see also Order No. 24,577 (Jan. 13, 2006), at 12; Order No. 24,511 (Sep. 9, 2005), at 12-13.

⁸ RSA 541-A:31,III.

⁹ RSA 374-F:3,III.

9. Pursuant to Order No. 27,022 issued in Docket No. DE 24-046,¹⁰ the Petition included a proposal to integrate default Energy Service reconciliations into the SCRC for recovery from all customers.¹¹

10. However, reconciliations already result in default service rates that do not accurately reflect market conditions. Allowing Eversource to recover costs associated with the provision of default service through the SCRC will exacerbate this issue and cause undue harm to the competitive markets and result in inaccurate price signals.

11. As a result, customers will not receive “clear price information on the cost components of generation, transmission, distribution, and any other ancillary charges.”¹² Consequently, customers will not be able to accurately evaluate the value of competitive supply offers; thereby, inhibiting the continued development and sustainability of the competitive retail electric market in New Hampshire.

12. RESA is a non-profit organization and trade association whose members are active participants in the retail competitive markets for electricity, including the New Hampshire retail electric market. Several RESA member companies are registered with the Department of Energy to serve residential, commercial and/or industrial customers in New Hampshire and are presently providing electricity service to customers in the State. As such, RESA has a substantial and specific interest in ensuring that the Commission’s decision regarding the Petition does not have an adverse effect on RESA members, their customers or the continued success of the competitive retail electric market in New Hampshire.

¹⁰ Order No. 27,022 (Jun. 20, 2024).

¹¹ See Petition, ¶ 9; see also Direct Testimony of Ashley N. Botelho and Edward A. Davis (Nov. 20, 2024) (“Eversource Testimony”), at 19:17-21:5.

¹² Cf. RSA 374-F:3,III.

13. RESA's participation in this proceeding would be in the interests of justice.

Because of the diversity of its members, their business models and the jurisdictions in which they do business, RESA has unique perspectives that will aid the Commission in its investigation.

14. RESA's participation will not impair the orderly conduct of the proceeding. In fact, RESA's participation in this docket will conserve resources for the Commission and other participants that might otherwise have to respond to participation by multiple individual RESA member companies. To the extent that RESA members participate individually in this docket, RESA will seek to coordinate its presentations with its members so as to avoid unnecessary duplication.

15. RESA has not yet determined the full extent of its participation and reserves the right to fully participate in this docket, including through comments, motion practice, and briefs.

CONCLUSION

For all the foregoing reasons, the Commission should grant RESA's petition to intervene in this proceeding.

Dated: December 27, 2024

Respectfully submitted,
RETAIL ENERGY SUPPLY
ASSOCIATION

By: 
Joey Lee Miranda
Robinson & Cole LLP
One State Street
Hartford, CT 06103
Tel. No.: (860) 275-8200
Fax No.: (860) 275-8299
E-mail: jmiranda@rc.com

Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Petition to Intervene has this day been sent via electronic mail or first-class mail to all persons on the service list.



Joey Lee Miranda

Dated: December 27, 2024