

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Re: Public Service Company of New Hampshire

DOCKET NO. DE 07-096

**PETITION OF CONSTELLATION NEWENERGY, INC. AND
CONSTELLATION ENERGY COMMODITIES GROUP, INC. TO INTERVENE**

Constellation NewEnergy, Inc. ("CNE") and Constellation Energy Commodities Group, Inc. ("CECG") hereby request that the Commission grant them full intervenor status in the above-captioned proceeding. In support of this Petition, CNE and CECG state as follows:

1. CNE is the leading competitive supplier of retail electricity in the United States, serving over 15,000 megawatts of load nationally and hundreds of accounts in New England.
2. CECG is the wholesale energy subsidiary of Constellation Energy, Inc., the parent company of CNE. CECG specializes in optimizing the supply and delivery of both fuel and power for producers and consumers of power, natural gas, oil and coal. As a wholesale electric supplier, CECG has an interest in providing electric power to Public Service Company of New Hampshire ("PSNH") for default service as well as supplying power to retail suppliers who may do business in New Hampshire.
3. The interest of customers in purchasing electricity from suppliers other than their local distribution company hinges primarily on the relative relationship of the price of electricity under the distribution company's default service and the price that competitive suppliers can offer.

4. Because the Commission will establish the energy service rate for customers of Public Service Company of New Hampshire ("PSNH") in this docket, the outcome of the docket will directly affect CNE.

5. CECG has previously suggested to the Commission that it should consider requiring PSNH to seek competitive bids to supply the power that PSNH purchases on the wholesale market to meet its energy service load requirements. CECG believes that permitting competitive suppliers to bid on providing PSNH's wholesale power requirements would benefit customers and minimize the extent to which energy service costs would need to be deferred to later periods or otherwise reconciled on an ongoing basis. The potential for PSNH's wholesale power purchase requirements to be put out to bid was identified in the Commission's order of notice in this proceeding as an issue that the Commission may consider. If the Commission were to require PSNH to seek competitive bids for its wholesale power purchases, CECG would be interested in submitting a proposal to supply that load.

6. For the foregoing reasons, the rights, duties, privileges, immunities and other substantial interests of CNE and CECG will be affected by this proceeding.

7. CNE and CECG believe that, as competitive electric suppliers, their participation in this proceeding will assist the Commission in its consideration of the matters before it. CNE and CECG have participated as full intervenors in past PSNH transition, default and energy service rate proceedings.

8. The interests of justice and orderly and prompt conduct of this proceeding will not be impaired by allowing CNE and CECG's intervention.

WHEREFORE, CNE and CECG respectfully request that, pursuant to RSA 541-A:32 and PUC 203.17, the Commission grant them full intervenor status in this proceeding.

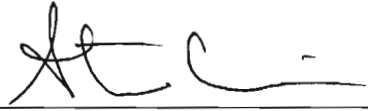
Respectfully submitted,

CONSTELLATION NEWENERGY, INC.
CONSTELLATION ENERGY COMMODITIES
GROUP, INC.

By their attorneys

McLANE, GRAF, RAULERSON & MIDDLETON
PROFESSIONAL ASSOCIATION

Date: October 3, 2007

By: 

Steven V. Camerino
11 South Main Street, Suite 500
Concord, NH 03301
Telephone (603) 226-0400
Fax (603) 230-4448

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition has been forwarded this 3rd day of October, 2007 to the service list in the above-captioned proceeding.



Steven V. Camerino