



Business and Industry Association  
New Hampshire's Statewide Chamber of Commerce

122 North Main Street, Concord, NH 03301  
Tel: 603.224.5388 • Fax: 603.224.2872 • Web: www.BIAofNH.com

October 9, 2014

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

DE 14-238

Determination Regarding PSNH's Generation Assets

**Business and Industry Association of New Hampshire's Response to Response and Objections of Public Service Company of New Hampshire to Petitions to Intervene**

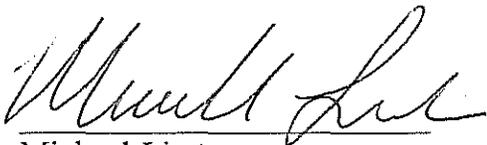
The BIA respectfully replies to Public Service Company of New Hampshire's (PSNH's) objection to the Business and Industry Association of New Hampshire's (BIA's) petition for intervention in DE 14-238. In support of this reply, the BIA states as follows:

1. As noted in the BIA's original petition for intervention, dated September 25, 2014, the BIA is a nonprofit business association comprised of more than 400 commercial and industrial businesses located throughout New Hampshire. BIA member companies range in size and represent nearly every sector of the economy. BIA members employ more than 86,000 people throughout the state, which represents one in eight jobs, and contribute \$4.5 billion annually to the state's economy. Many of these members, who are retail customers of PSNH, will be directly impacted by the outcome of this proceeding.
2. BIA's stated mission is to "promote a healthy business climate and robust economic future for New Hampshire." The resolution of this docket will have a direct effect on electricity rates for all of PSNH's customers, which would directly impact the state's business climate.
3. Many of BIA's member companies do not have the ability or resources to participate in legislative and regulatory proceedings. These businesses become members of the BIA so that the association can participate on their behalf and advocate for their interests.
4. PSNH's objections are inconsistent. PSNH did not object to the petition of Mr. Pentti Aalto on the grounds that he was an individual retail customer. In its opposition to the BIA's intervention, PSNH ignores that the BIA serves as a representative organization for many individual commercial and industrial retail customers. These customers have the same rights as Mr. Aalto and deserve to have their views represented during this proceeding.

5. In support of its objection, PSNH specifically references Order No. 25,715, which pertains to the petitions of Freedom Logistics LLC d/b/a Freedom Energy Logistics (FEL) and NextEra Energy Power Marketing LLC (NEPM) in Liberty Utilities Docket No. DE 14-211. The Commission's actions in Order No. 24,715 has no relevance to the BIA's intervention in this proceeding. The two companies to which Order No. 25,715 applies are regional wholesale power market participants. The BIA is not an aggregator and does not participate in the regional wholesale power market. The BIA's interest on behalf of retail electric customers in DE 14-238 is completely different from the interests of Freedom Logistics LLC d/b/a Freedom Energy Logistics (FEL) and NextEra Energy Power Marketing LLC (NEPM) stated in DE-14-211. Therefore, Order No. 25,715 should have no bearing on the BIA's petition for intervention in DE 14-238.
6. Furthermore, it should be noted that during the pre-hearing conference on DE 14-238, the Commission expressed a strong interest in consolidating the number of intervenors to ensure an expeditious and orderly proceeding. The BIA is in fact a consolidated group of businesses representing a common interest in this proceeding. BIA's single intervention on behalf of its members would seem far preferable to 400 separate petitions for intervention by individual retail business customers of PSNH.

The BIA respectfully requests that the Commission grant it full intervenor status in this proceeding and grant such other relief as the Commission deems just and equitable.

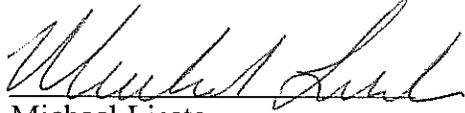
Respectfully submitted,



Michael Licata  
Vice President of Public Policy

**Certificate of Service**

I certify that on this date a copy of the foregoing was hand delivered to the PUC and the Office of the Consumer Advocate, and sent electronically to the utilities and all other parties on the Service List in DE 14-238.

A handwritten signature in cursive script, appearing to read "Michael Licata".

Michael Licata

Vice President of Public Policy

October 9, 2014