

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

Docket No. DE 16-674

Clifton Below

Motion to Correct Errors in PUC Determination of Avoided Costs

Assented-to Motion to Intervene of Liberty Utilities (Granite State Electric) Corp. d/b/a
Liberty Utilities

Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty Utilities (“Liberty”), through counsel, respectfully moves the New Hampshire Public Utilities Commission to intervene in this docket pursuant to RSA 541-A:32 and Puc 203.17.

1. Petitioner Clifton Below is a customer-generator served by Liberty.
2. In this docket Mr. Below asks the Commission to recalculate the rates for utility avoided costs, which calculation is required by Puc 903.02.
3. Liberty bases any payments it may make to customer-generators on the Commission-calculated avoided cost rates, as do the other electric utilities in this state.
4. A change to the avoided cost rates arising from this docket will thus affect payments Liberty may make to Mr. Below and to other customer-generators in its service territory.
5. Therefore, Liberty satisfies the statutory requirement for mandatory intervention because Liberty’s “rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” RSA 541-A:32, I(b).

6. Mr. Below, the Office of Consumer Advocate, and Commission Staff all assent to the relief sought in this motion.

7.

WHEREFORE, Liberty respectfully asks that the Commission:

- (a) Grant Liberty's motion to intervene;
- (b) Grant such other and further relief as may be consistent with the public interest.

Dated: August 15, 2016

Respectfully Submitted,

Liberty Utilities (Granite State Electric)
Corp. d/b/a Liberty Utilities



By: _____
Michael J. Sheehan
Senior Counsel
15 Buttrick Road
Londonderry, NH 03053
(603) 216-3635
Michael.Sheehan@LibertyUtilities.com

Certificate of Service

I hereby certify that on this 15th day of August 2016, a copy of this Motion to Intervene has been sent electronically to the service list.



By: _____
Michael J. Sheehan