



Commission Orders and any other documents issued on both ExGen and its attorney. Particularly, ExGen respectfully requests that service be made to its counsel of record, Melissa Lauderdale-Ward, with an electronic courtesy copy, if possible, to be served on Daniel Allegretti.

4. On June 28, 2017, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) filed a petition with the Commission for approval of its proposal to provide energy service to its customers under a new method for developing energy service rates effective January 1, 2018.

5. ExGen hereby seeks to intervene in this proceeding. The Commission “shall grant” a petition for intervention where “[t]he petition states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding.” N.H. Rev. Stat. Ann §541-1:32, I(b). The Commission “may grant” a petition for intervention where “intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings.” *Id.* At I(c). As detailed below, ExGen’s petition for intervention satisfies both standards.

6. ExGen is an indirect, wholly-owned subsidiary of Exelon Corp., a North American energy company with several merchant subsidiaries in addition to ExGen, as well as regulated utility subsidiaries in Pennsylvania (PECO Energy Company), Illinois (Commonwealth Edison Company), New Jersey (Atlantic City Electric), Delaware, the District of Columbia, and Maryland (Delmarva, PEPCO and Baltimore Gas and Electric Company). ExGen has market-based rate authority from the Federal Energy Regulatory Commission (“FERC”) and is a buyer and seller of wholesale electricity and capacity.

7. ExGen also provides wholesale power and risk management services to wholesale customers (including, but not limited to: distribution utilities, co-ops, municipalities, power marketers, utilities and other large load serving entities), including through participation in wholesale load procurements, in both regulated and restructured energy markets.

8. The Eversource petition presents fundamental issues which affect the ability of ExGen, and suppliers like it, to compete in the New Hampshire and New England electricity market. The Commission’s July 11, 2017 Order of Notice recognizes that Eversource’s plan could have a direct and substantial impact on businesses like ExGen. The Commission identified the following issues raised by Eversource’s petition including:

- a. Whether the proposals for the Small Customer and the Large Customer group power requirements are in the public interest and result in just and reasonable rates consistent with RSA 374:2 and are market based consistent with RSA 374-F;
- b. Whether Eversource appropriately calculates overhead and ancillary energy costs for inclusion in resulting energy service rates; and
- c. Whether it is in the public interest and consistent with RSA 369-B for Eversource to implement the solicitation and rate setting process before divestiture is completed.

Order of Notice at 3, Docket No. DE 17-113 (July 11, 2017). The resolution of each of these issues, in addition to other issues identified through the proceeding and by the Commission, will directly impact ExGen's business.

9. ExGen's direct and substantial interest in these and other issues raised by the Eversource petition requires that the Commission approve ExGen's intervention. N.H. Code Admin. R. PUC §203.17; N.H. Rev. Stat. Ann § 541-A:32, I(b). The Commission may also approve the intervention because it satisfies the interests of justice and ExGen's timely intervention would not impair the orderly and prompt conduct of the proceeding. N.H. Rev. Stat. Ann. § 541-A:32, I(c). Rather, ExGen's input and perspective on the issues raised by Eversource's petition would be valuable to the Commission's proper and informed resolution of the issues. Accordingly, the "interests of justice" also favor the Commission's approval of ExGen's intervention.

10. ExGen respectfully requests the right to participate in the proceeding with the right to receive copies of all pleadings, discovery requests and responses, and any and all other documents, and to file briefs in accordance with the procedural schedule established by the Commission. No other parties can adequately represent ExGen's interests in this proceeding.

WHEREFORE, for all the foregoing reasons, ExGen respectfully requests that its Petition to Intervene be granted and that the Commission grant it such other relief as is just and reasonable under the circumstances.

Respectfully submitted,



Melissa Lauderdale-Ward  
Assistant General Counsel  
Exelon Business Services Company, LLC  
1310 Point Street  
Baltimore, MD 21231  
(410) 470-3582  
[Melissa.Lauderdale-Ward@exeloncorp.com](mailto:Melissa.Lauderdale-Ward@exeloncorp.com)

*Attorney for Exelon Generation Company, LLC*

Dated: July 31, 2017

## CERTIFICATE OF SERVICE

On this 31<sup>st</sup> day of July, 2017, I certify that in accordance with N.H. Code Admin. R. 203.11, I caused the foregoing Petition to Intervene of Exelon Generation Company, LLC to be served electronically to the e-mail addresses specified on the Commission's service list for the docket.

Respectfully,



Melissa Lauderdale-Ward  
Assistant General Counsel  
Exelon Business Services Company, LLC  
1310 Point Street  
Baltimore, MD 21231  
(410) 470-3582  
[Melissa.Lauderdale-Ward@exeloncorp.com](mailto:Melissa.Lauderdale-Ward@exeloncorp.com)