

**THE STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY**

Petition for Approval of Energy Service Supply Proposal

Docket No. DE 17-113

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**  
**D/B/A EVERSOURCE ENERGY'S OBJECTION**  
**TO PETITION TO INTERVENE OF ENERNOC, INC.**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07 and RSA chapter 541-A, Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource" or the "Company") hereby objects to the petition to intervene of EnerNOC, Inc. In support of its objection, Eversource states the following:

1. On June 29, 2017, Eversource filed a petition for approval of a new energy service supply proposal in connection with Eversource's divestiture of its generating assets. In its proposal, Eversource is seeking the Commission's approval of its proposed request for proposals ("RFP") based competitive procurement process, and other activities associated with Eversource's transition to a competitive procurement of default Energy Service ("ES") for its customers who do not have other electric suppliers. On July 31, 2017, EnerNOC timely petitioned to intervene in the proceeding. EnerNOC's petition does not meet the standards for intervention and its petition should, therefore, be denied.
2. In its petition, EnerNOC contends that it offers products and services related to competitive procurement processes and that based on its experience offering such products and services it believes the Commission would benefit from its input as well as from the "consideration of alternatives to RFPs." EnerNOC Petition paragraph 4. With

respect to the general claim of offering helpful information, EnerNOC does not explain what information it may provide nor how that information would be relevant to the proposal in the docket. The Commission has recently indicated that blanket statements of having helpful information should not, on their face, be accepted as a basis for intervention. *See* Transcript of November 30, 2015 Hearing in Docket No. DE 15-068 at 7. Accordingly, such claims should not form the basis for intervention here.

3. With respect to the consideration of alternatives to RFPs and the use of EnerNOC's products and services in relation to such alternatives, Eversource notes that EnerNOC does not explain what the possible alternatives might be, how they might complement or clash with the present proposal, or how costly or time consuming they might be to implement. If EnerNOC is concerned with issues relating to the manner of competitive procurement as conducted in New Hampshire, such concerns would appear to be better suited to a generic docket such as Docket No. IR 14-338, rather than in response to a proposal such as the one made by Eversource here. The RFP process proposed by Eversource for procurement of ES is one with which the Commission and the Company are familiar and which has been approved and implemented for other regulated utilities in the state. Attempting to review the potential benefits and drawbacks of a different method, and then potentially attempting to implement that method, in addition to determining whether or if EnerNOC's products or services have a place in that method, would be time consuming and would likely disrupt the efficient implementation of the ES change proposed for January 1, 2018. In short, EnerNOC's interests appear most appropriately addressed in a generic proceeding, and should not support intervention in this docket.

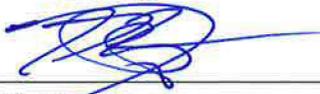
WHEREFORE, Eversource respectfully requests that the Commission:

- (1) Deny EnerNOC's petition to intervene in this proceeding; and
- (2) Order such further relief as may be just and equitable.

Respectfully submitted,

**Public Service Company of New Hampshire d/b/a  
Eversource Energy**

August 4, 2017  
Date

By:   
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

August 4, 2017  
Date

  
Matthew J. Fossum