

BEFORE THE STATE OF NEW HAMPSHIIRE
PUBLIC UTILITIES COMMISSION

Eversource Petition for Approval of Energy Service) Supply Proposal)	DE 17-113
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**PETITION TO INTERVENE OF
RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to New Hampshire Revised Statutes Annotated (“RSA”) 541-A:32, New Hampshire Administrative Rules, Puc 203.17, and the July 17, 2017 Order of Notice in this docket, Retail Energy Supply Association (“RESA”) petitions to intervene as a party in the above-captioned docket reviewing issues relating to the new proposal for providing energy service to its customers following divestiture of its generation assets in New Hampshire offered by Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”).¹ As grounds for its intervention, RESA states as follows:

1. RESA is a nonprofit organization and trade association that represents the interests of its members in the Mid-Atlantic, Great Lakes, New York and New England regions. RESA members are active participants in the retail competitive markets for electricity, including the New Hampshire retail electric market. Numerous RESA member companies are licensed by the Public Utilities Commission (the “Commission”) to serve residential, commercial and industrial customers in New Hampshire, including

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

within distribution service territories served by Eversource, and are presently providing electricity service to customers in the State in competition with the Eversource energy service rate approved by the Commission. As such, RESA and its members have a substantial and specific interest in ensuring that the new energy service rate methodology used in the Eversource territory be established and designed in a reasonable and lawful manner that allows licensed suppliers to compete with the energy service rate on fair and equitable terms.

2. As a trade association whose members serve a significant number of New Hampshire electric supply customers in Eversource territories, RESA's "legal rights, duties, privileges, immunities and special interests will be directly affected by the Commission's final decision in this proceeding." RSA 541-A:32. In this proceeding, the Commission will review and rule on matters pertaining to, among other things, the new energy service rate methodology that will replace the existing rate structure based on PSNH's generation facilities and related costs, including but not limited to default service-related costs. The issues related to transitioning from the existing rate structure and the development of a new rate structure, both during the period in which Eversource retains generation facilities and after divestiture is completed, have the potential to directly affect the competitive retail marketplace in which RESA members operate. Accordingly, in order to permit RESA to adequately protect the interests of its members, the Commission should grant RESA's request to intervene in this matter.

3. RESA's intervention will not impair the orderly conduct of this proceeding. Indeed, RESA's participation as a party in this docket conserves resources for the Commission and other participants that might otherwise have to respond to

participation by multiple individual RESA member companies seeking to protect their own interests. It will also protect in an efficient manner the interests of RESA's members that do not otherwise seek party or limited participant status. To the extent that RESA members participate individually in this docket, RESA will seek to coordinate its presentations with its members so as to avoid unnecessary duplication.

3. RESA plans to attend the pre-hearing conference and technical session currently scheduled for August 4, 2017. RESA anticipates it will review Eversource's initial testimony and identify particular issues of sufficient importance to RESA and its members to merit responsive factual evidence and/or written arguments from RESA. RESA reserves the right to conduct discovery, present evidence (including both pre-filed and live testimony), cross-examine witnesses and present written pleadings and briefs to the extent necessary given its interest in the issues before the Commission.

4. Written and electronic copies of all pleadings and other materials should be provided to the undersigned counsel for RESA.

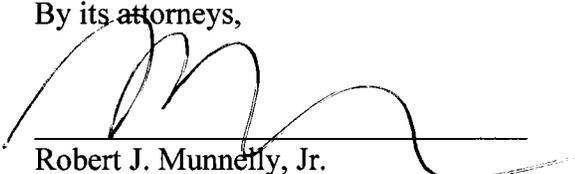
Conclusion

Accordingly, for the above-described reasons, the Commission should grant RESA's Petition to Intervene.

Respectfully submitted,

RETAIL ENERGY SUPPLY ASSOCIATION

By its attorneys,

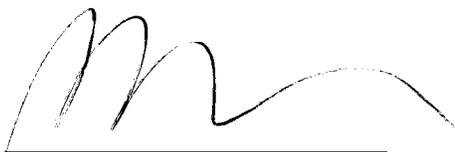


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Dated: August 1, 2017

Certificate of Service

I hereby certify that a copy of the foregoing Petition to Intervene of Retail Energy Supply Association has on this 1st day of August 2017 been sent by email to the service list in DE 17-113.

By: 
Robert J. Munnelly, Jr.