

**STATE OF NEW HAMPSHIRE**  
**BEFORE THE**  
**NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**  
**DE 18-002**

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

**2018 Energy Service Solicitation**

**Petition to Intervene on Behalf of NextEra Energy Marketing, LLC**

NextEra Energy Marketing, LLC (“NEM”) respectfully petitions the New Hampshire Public Utilities Commission (“Commission”) for leave to intervene in the above-captioned proceeding under Admin. Rule Puc 203.17 and RSA 541-A:32. In support of this petition, NEM represents that:

1. On January 12, 2018, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) filed a letter requesting the Commission open a docket and issue an order of notice providing for a process and hearing on Eversource's competitive solicitation of energy service for its customers. Eversource filed its request pursuant to Order No. 26,092 (December 29, 2017) that approved the settlement agreement in Docket No. DE 17-113 specifying the method for Eversource to transition from its historical method of providing energy service from its generation assets to one based on a competitive solicitation in the energy market. NEM intervened and participated in Docket No. DE 17-113.

2. On January 22, 2017, the Commission issued an Order of Notice in this proceeding, explaining that Eversource plans to select a bidder(s) for the competitive solicitation of energy service no later than February 7, 2018, and will make a filing with

the Commission on February 9, 2018. The Commission set forth February 14, 2018 as a hearing date to consider Eversource's February 9, 2018 filing.

3. The Order of Notice stated that interventions are due February 7, 2018, and that the petition to intervene shall state the facts demonstrating how the entities rights, duties, privileges, immunities or other substantial interest may be affected by the proceeding, consistent with N.H. Code Admin. Rule Puc 203.17.

4. Pursuant to RSA 541-A:32, Admin. Rule Puc 203.17, and precedent established by the Commission, it must grant a petition to intervene if: (a) the petition is submitted in writing at least three days before the hearing; (b) the petition describes how the petitioner is substantially and specifically affected by the proceeding; and (c) the intervention would be in the interests of justice and would not impair the orderly conduct of the proceeding. Emphasis added. The Commission also has the discretion to grant a petition to intervene "at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings." RSA 541-A:32,II, Emphasis added. *See also* N.H. Admin. R. Puc 207.13 (requiring the Commission to grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32).

5. The Commission has exercised this discretion by granting intervention to suppliers of generation services in the ISO-New England wholesale markets that will be affected by contracts subject to Commission approval and will assist the Commission in understanding wholesale market impacts. Order No. 25,886 (April 22, 2016) in DE 16-241 at 3. *See*, DG 15-155 (secretarial letter dated July 31, 2015) (where the Commission granted intervention to a company in the business of delivering compressed natural gas to

customers and that company's interests would be affected by the Petitioner's proposal to sole source its gas supply rather than utilizing a competitive bid process). *See also*, DE 08-077 (secretarial letter dated July 8, 2008) (where the Commission granted intervention to a retail electricity supplier in a proceeding to consider a PSNH request for approval of a sole source power purchase agreement with a renewable energy project in New Hampshire); and DE 17-113 (secretarial letter dated August 16, 2017).

6. NEM is a Delaware limited liability company with its primary place of business at 700 Universe Blvd., Juno Beach, Florida and is an indirect, wholly-owned subsidiary of NextEra Energy Resources, LLC ("NEER"). NEER is a national renewable energy marketing and development company that owns and operates over 19,000 megawatts of electric generating capacity in 29 states and Canada. NEER's generation fleet includes wind, solar, natural gas, and nuclear energy resources; in New England it includes the Seabrook Nuclear Generating Station (directly owned by NextEra Energy Seabrook, LLC, which has a 88.22889% ownership interest in the plant), the gas or oil-fired combined cycle generating facility in Bellingham, MA (50% ownership interest), and the Wyman generating facilities in Yarmouth and South Portland, Maine.

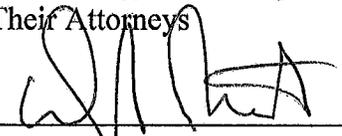
7. NEM is an important player in the wholesale power market in New England, and primarily sells power to utilities, retail electricity providers, power cooperatives, municipal electric providers, and large industrial companies. The determinations in this proceeding will directly impact NEM in that NEM intends to bid into Eversource's competitive solicitation for energy service, and, therefore, NEM seeks to ensure that the procurement for energy service is conducted consistent with the settlement in Docket No. DE 17-113. Accordingly, NEM's rights, duties, privileges, or

substantial interests as a wholesale power marketer will be affected by this proceeding. NEM's intervention will not impair the orderly conduct of this proceeding. NEM further submits that its participation will assist the Commission by providing a broader range of input and information than will otherwise exist through the parties to this docket.

**WHEREFORE**, NEM respectfully requests that the Commission grant it intervenor status in the proceeding as described above or grant such other relief as the Commission deems just and equitable.

Respectfully submitted,

NextEra Energy Marketing, LLC  
By Their Attorneys



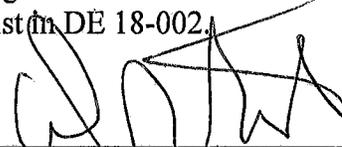
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Douglas L. Patch  
Orr & Reno, P.A.  
45 S. Main St.  
P.O. Box 3550  
Concord, N.H. 03302-3550  
(603) 223-9161  
[dpatch@orr-reno.com](mailto:dpatch@orr-reno.com)

Dated: February 7, 2018

**Certificate of Service**

I hereby certify that a copy of the foregoing Petition has on this 7<sup>th</sup> day of February 2018 been sent by email to the service list in DE 18-002.

By:   
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Douglas L. Patch