

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

**Docket No. IR 22-0053  
Investigation of Energy Commodity Procurement Methodology and Process**

**PETITION TO INTERVENE OF  
CONSTELLATION NEWENERGY, INC. AND CONSTELLATION ENERGY  
GENERATION, LLC**

Pursuant to the Order of Notice issued on September 6, 2022 (“Order”) by the New Hampshire Public Utilities Commission (“Commission”) in the above-captioned docket, N.H. Code Admin. Rules PUC 203.17, and RSA 541-A:32, Constellation NewEnergy, Inc. (“CNE”) and Constellation Energy Generation, LLC (“Constellation Generation” and, together with CNE, “Constellation”) hereby petition the Commission for leave to intervene in the above-referenced proceeding as a full party participant. In support of this Petition, Constellation states the following:

1. CNE is a Delaware corporation and maintains its principal offices at 1310 Point Street, Baltimore, MD 21231 and Constellation Generation is a Pennsylvania Limited Liability Company and maintains its principal offices at 1310 Point Street, Baltimore, MD 21231.
2. Constellation Generation has been granted market-based rate authority by the Federal Energy Regulatory Commission and is a buyer and seller of wholesale electricity and capacity. Constellation Generation provides wholesale power and risk management services to wholesale customers, including through participation in wholesale load procurements, in both regulated and restructured energy markets.

3. CNE is a retail marketing subsidiary of Constellation Generation and is a licensed electric generation supplier in the State of New Hampshire as well as a number of other jurisdictions.
4. Both CNE and Constellation Generation are active participants in ISO-NE.
5. In its Order, the Commission states that it opens this investigatory proceeding “to examine all pertinent aspects of RPS [Renewable Portfolio Standards], Default Service, and COG [Cost of Gas] procurements in New Hampshire, and related Commission processes.”
6. Constellation Generation has extensive experience as a wholesale supplier both in New Hampshire and in other jurisdictions which will be beneficial to the Commission in its consideration of these issues. In particular, Constellation Generation can speak to the impacts of procurement practices on wholesale supply service and procurement activities.
7. As a wholesale supplier, Constellation Generation is likely to be substantially and specifically affected by the Commission’s findings with respect to these issues.
8. CNE has extensive experience as a retail supplier in New Hampshire and in other jurisdictions and is a community power aggregator (“CPA”) in multiple jurisdictions which will be beneficial to the Commission in its consideration of these issues. In particular, CNE can speak to the impacts of procurement practices on CPAs and vice-versa.
9. As a retail supplier, CNE is likely to be substantially and specifically affected by the Commission’s findings with respect to these issues.

10. Constellation's interests and experiences in this matter are unique and cannot be adequately represented by any other party.

11. Constellation's intervention in this proceeding will serve the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

For the foregoing reasons, Constellation hereby requests that the Commission grant its Petition to Intervene in this proceeding as a full party.

Respectfully submitted,  
CONSTELLATION NEWENERGY, INC.  
AND  
CONSTELLATION ENERGY GENERATION, LLC



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