BEFORE THE PUBLIC UTILITIES COMMISISON STATE OF NEW HAMPSHIRE

IR 22-053

ELECTRIC AND GAS UTILITIES

Investigation of Energy Commodity Procurement (Renewable Portfolio Standard; Default Service Electric Power; Cost of Gas) Methodology and Process

September 20, 2022

<u>COMMUNITY POWER COALITION OF NEW HAMPSHIRE</u> <u>PETITON TO INTERVENE</u>

Now Comes the Community Power Coalition of New Hampshire ("CPCNH") and petitions the New Hampshire Public Utilities Commission, in response to its Order of Notice, issued on September 6, 2022, in this investigation and pursuant to NH Code of Administrative Rules Puc 203.02 and Puc 203.17, to allow CPCNH to intervene in the above-captioned matter for the following reasons:

- CPCNH is a voluntary New Hampshire nonprofit corporation with a principal place of business of City Hall, 51 North Park St., Lebanon, NH 03766 and a mailing address c/o. Sustainability Director, Town of Hanover, 41 S Main Street, Hanover NH 03755
- CPCNH is a governmental instrumentality of its 20 members comprised of 19 NH municipalities and one county and is organized pursuant to a joint powers agreement under NH RSA 53-A and 53-E:3, II(b).
- 3. CPCNH is in the process of standing up as a functioning joint power supply agency to procure and supply electricity and related services to member community power programs.
- CPCNH is planning to support the launch of initial member community power aggregations as alternative default energy service providers in the spring of next year pursuant to RSA 53-E and RSA 374-F:2, I-a.
- 5. CPCNH actively contributed to and participated in the PUC's development of proposed Puc 2200 administrative rules for municipal and county aggregations in DRM 21-142, which were conditionally approved by the Joint Legislative Committee on Administrative Rules on September 16, 2022. These rules, and consequently the launch and operation of community

power programs, have a somewhat complex interplay with utility provided default service, which may be considered in the investigation, effecting the rights, duties and privileges of CPCNH and its members.

- 6. As noted in the Commission's Order of Notice, this investigation is expected to consider "the potential impacts to Default Service due to Community Power Aggregations (CPAs) pursuant to RSA Chapter 53-E" among other matters and raises issues related to RSA 53-E and RSA 374-F, which the Coalition and its members have direct interest in.
- CPCNH has a substantial interest in the issues to be addressed by this investigation and CPCNH's intervention will not impair the orderly and prompt conduct of the proceedings, will not result in undue delay, and will not prejudice the interest of any party.

WHEREFORE, CPCNH requests that the Commission grant this petition to allow CPCNH to be made a full intervenor in this proceeding and grant such other relief as is just and proper.

Respectfully submitted this 20th day of September 2022

Community Power Coalition of New Hampshire

by CPCNH Chair Clifton Below, duly authorized