

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

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

PETITION TO INTERVENE  
ON BEHALF OF GRANITE STATE HYDROPOWER ASSOCIATION

NOW COMES the Granite State Hydropower Association (GSHA) and pursuant to RSA 541-A:32 and N.H. Code Admin. Rule Puc 203.17, hereby petitions the New Hampshire Public Utilities Commission (“Commission”) for intervention in the above-captioned proceeding. In support of this petition GSHA states as follows:

1. GSHA is a voluntary, non-profit trade association for the small-scale hydropower industry in New Hampshire. Members of GSHA own and operate nearly 50 hydroelectric facilities located in 35 towns and cities throughout the state, totaling nearly 55 megawatts (MWs) of distributed generation.
2. On September 6, 2022, the Commission issued an Order of Notice opening an investigative docket “to examine all pertinent aspects of RPS, Default Service, and COG procurements in New Hampshire, and related Commission processes.” Order of Notice at 2. Specifically, the Commission intends to investigate the “timing and other approaches historically used by New Hampshire utilities for RPS, Default Service...and data regarding outcomes correlated with different approaches.” Id. at 3.

3. As renewable energy generators, GSHA members generate and market Renewable Energy Certificates (REC) purchased to comply with Renewable Portfolio Standard requirements. Therefore, GSHA members have a substantial interest in the timing and approaches used in RPS compliance procurements.
4. Further, GSHA members generate and sell electricity as small renewable energy generators. Therefore, GSHA members have a substantial interest in the timing and approaches used in utility default service procurements.
5. As active participants in REC and energy markets in New Hampshire, GSHA members' "rights, duties, privileges, immunities and other substantial interests" are directly affected by this docket. Issues identified in this docket's order of notice and any resulting recommendations or decisions will directly affect GSHA member's interests.
6. GSHA has intervened and participated in NH PUC dockets previously to represent the interests of its members, and GSHA's participation in this docket is in the interest of justice and will not interfere with the orderly and prompt conduct of these proceedings.

For these reasons, we request that the Commission grant intervenor status to GSHA in this docket.

Respectfully submitted  
Granite State Hydropower Association

By:



Madeleine Mineau  
GSHA Board member

I hereby certify that a copy of the foregoing Petition to Intervene on behalf of Granite State Hydropower Association on this 23rd day of September, 2022, will be delivered by electronic mail to the service list IR 22-053.



Madeleine Mineau

## Service List - Docket Related

Docket# : 22-053

Printed: 9/20/2022

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