NHPUC OCTO9'14 PM 3:32

October 9, 2014

State Of New Hampshire Public Utilities Commission

DE 14-238

Determination Regarding PSNH's Generation Assets

NHSEA's d/b/a NH CleanTech Council's Reply to Response and Objections of Public Service Company of New Hampshire to Petitions to Intervene

The NH Sustainable Energy Association (NHSEA), d.b.a. The NH CleanTech Council (NHCTC), representing ratepayers, business owners, and generators in the clean technology and energy sectors, respectfully responds herein to Public Service Company of New Hampshire's (PSNH) Response and Objections to our petition for intervention in DE 14-238.

- 1. Many of our members are also PSNH retail customers, such as petitioner Pentti J. Aalto.
- 2. Many members, in addition or otherwise, to being retail customers, are also small generators eligible to receive certain rates and access under the Public Utility Regulatory Policies Act; the fate of PSNH's generation assets and resulting business structure may affect these rates and access, and thus demonstrating a "duty or privilege" that may be affected by this proceeding. We likewise have members that hold or may seek to hold long-term energy contracts with PSNH, and therefore the fate and future of such contracts is of significant interest to us.
- 3. The standard of the "economic interest of retail ratepayers" set forth for the determination of this docket is directly related to our guiding principle and goal of "open and competitive markets." The promotion and protection of open and competitive markets are not only among the general goals of restructuring, they also, at least in part, foster downward pressure on prices, which directly benefit the economic interests of PSNH's retail customers.
- 4. As asserted in our original petition and elaborated above, the NHCTC intervention would be in the full interest of justice, will comply with all PUC procedural rules and will not interfere with the orderly and expeditious proceeding of this docket.

Thank you for the opportunity to respond to PSNH's concerns and objections,

Respectfully submitted,

Kate Epsen

Executive Director

Certificate of Services

I certify that a copy of the foregoing has on this 9th day of October, 2014 been either sent by electronic mail to persons listed on the Service List for DE 14-238 and hand-delivered to the NH PUC and the Office of Consumer Advocate.

Kate Ensen