

**THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION**

Freedom Logistics, LLC d/b/a Freedom Energy Logistics

Petition for Authorization Pursuant to RSA 362-A:2-A, II
for a Purchase of LEEPA Output by the Private Sector

Docket No. DE 15-068

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

Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource” or the “Company”) hereby respectfully petitions to intervene in the above-captioned docket pursuant to RSA 541-A: 32, Puc 203.02, Puc 203.17 and the Commission’s order of notice dated April 7, 2015 in the above-referenced proceeding. In support of its Petition, Eversource says the following:

1. As relevant to this petition, Eversource is a New Hampshire public utility engaged in the business of the transmitting and distributing electrical energy in New Hampshire. Eversource interconnects its systems with those of various electrical generators throughout the state, including privately-owned hydro-electric facilities, and transmits their energy to wholesale markets and retail end users. Generally, when smaller generators sell their output to Eversource those generators are paid for the energy they produce at the applicable short-term avoided cost rate as calculated by multiplying the amount of energy by the market price for sales into the ISO-New England marketplace with some minor adjustments.

2. By a petition filed in the above-captioned docket, Freedom Logistics, LLC d/b/a Freedom Energy Logistics (“FEL”) seeks authorization to purchase 5 kw of energy directly from

a hydro-electric facility – Fiske Hydro located in Hinsdale, New Hampshire – and have that energy delivered over Eversource’s transmission and distribution network to FEL’s retail meter in Auburn, New Hampshire. Under the proposed transaction, Eversource would deduct “the kilowatt-hours sold by Fisk[e] Hydro to FEL and delivered to FEL’s meter from the total usage recorded on FEL’s meter. PSNH will render monthly bills to FEL based upon total usage net of the kilowatt-hours purchased from Fiske Hydro.” FEL Petition at ¶ 23. Further, according to the petition “FEL will pay to PSNH for any costs as determined by the Commission (net of locational value resulting from avoided transmission and distribution costs, and avoided line losses) incurred in wheeling and delivering the 5 KW of the output of Fiske Hydro to FEL’s meter.” FEL Petition at ¶ 24.


3. On April 7, 2015, the Commission issued an order of notice in the docket and noted that the petition raises “issues related to the interpretation of RSA 362-A:2-A, II under LEEPA, and the terms and conditions of agreements and arrangements pursuant to which the electrical output of the limited electrical energy producer will be sold to the end user and wheeled by the franchised electric distribution utility from the producer to the end user.” Order of Notice at 2. In that the docket concerns agreements and arrangements relating to the potential wheeling of power by a franchised electric utility, Eversource has rights, duties, privileges immunities and other substantial interests that may be affected by the proceeding. The effect on Eversource’s rights, duties, privileges immunities and other substantial interests is made even more apparent by the facts that this specific transaction concerns an arrangement that, if consummated, would occur in Eversource’s franchised service territory and involve the use of Eversource’s facilities. Accordingly, Eversource petitions to be an intervenor in this proceeding pursuant to RSA 541-A:32 and the Commission’s rules.

WHEREFORE, Eversource respectfully requests that the Commission issue an order granting Eversource's request to intervene, and to order such further relief as may be just and equitable.

Respectfully submitted,

**Public Service Company of New Hampshire d/b/a
Eversource Energy**

May 4, 2015
Date

By: 
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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Petition for Intervention to be served pursuant to N.H. Code Admin. Rule Puc 203.11 and the Commission's order of notice in this docket.

May 4, 2015
Date


Matthew J. Fossum