

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

DE 15-068

FREEDOM LOGISTICS, LLC d/b/a FREEDOM ENERGY LOGISTICS

LIBERTY UTILITIES' PETITION TO INTERVENE

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (“Liberty Utilities” or the “Company”) hereby petitions to intervene in the above-captioned docket pursuant to RSA 541-A:32 and Puc 203.17. In support hereof, Liberty Utilities states as follows:

1. On February 17, 2015, Freedom Logistics, LLC d/b/a Freedom Energy Logistics (“FEL”) filed a petition seeking a determination by the Commission regarding whether FEL’s agreement to purchase the output generated by Fiske Hydro, Inc. and net such output against FEL’s total usage recorded on its meter with Public Service Company of New Hampshire d/b/a Eversource Energy is consistent with RSA 362-A:2-A, II. The Commission has opened this docket to consider FEL’s request.

2. RSA 541-A:32 provides that a petition to intervene shall be granted where “(b) [t]he petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law and (c) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

3. Liberty Utilities seeks to intervene in this docket because its rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding. The transaction

proposed by FEL is a matter of first impression in New Hampshire, and if authorized by the Commission, will impact the obligations of every electric distribution utility in the state to the extent that there are other customers who seek to purchase electric output from a third party and net that against the amounts due and owing the electric distribution utility. Liberty Utilities has additional interests that may be affected by FEL's petition including the costs involved in retail wheeling and the development of a wheeling agreement; whether the proposed arrangement is a form of "virtual" net metering not specifically permitted by RSA 362-A:9; whether a retail customer can purchase electricity supply from more than one supplier; and billing concerns including the determination of which rate components of the electric distribution utility would be subject to the proposed reduction in usage. The interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention, particularly where the proceeding is just beginning.

WHEREFORE, Liberty Utilities respectfully requests that the Commission:

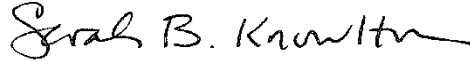
- A. Grant this petition to intervene; and
- B. Grant such other and further relief as the Commission deems necessary

and just.

Respectfully submitted,

LIBERTY UTILITIES (GRANITE STATE ELECTRIC)
CORP. D/B/A LIBERTY UTILITIES

By its Attorney,



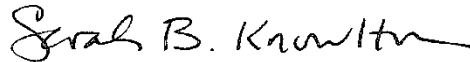
Date: April 30, 2015

By: _____

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Certificate of Service

I hereby certify that on April 30, 2015, a copy of this Petition to Intervene has been sent to the service list in this docket.



Sarah B. Knowlton