

**THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSISON**

DE 19-064

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

Request for Change in Rates

CITY OF LEBANON PETITON TO INTERVENE

Now Comes the City of Lebanon (“City”) and petitions the New Hampshire Public Utilities Commission, in response to Order No. 26,252 and pursuant to NH Code of Administrative Rules Puc 203.2 and Puc 203.17 and NH RSA 541:A:32, to allow the City to intervene in the above-captioned matter for the following reasons:

1. The City is a municipal corporation with an address of 51 North Park St., Lebanon, NH 03766.
2. The City is an electric customer of Liberty Utilities with approximately 85 meters and accounts with Liberty at G1, G2, G3 and M01 rates and consumes about 4 million kWh per year.
3. The City participated in DE 16-383, Liberty Utilities last electric distribution rate case, as an intervenor and party to the settlement approved by the Commission, which included a commitment by Liberty Utilities to “work collaboratively with Staff and the City to develop an LED tariff that allows customers to install LED fixtures” and “explore alternative options with respect to offering LED street lighting service” (p.13). Now that Liberty Utilities has finally proposed an LED street lighting tariff that allows for municipally selected and provided street lighting, the City would like to follow through in the Commission consideration of the proposed LED tariff.
4. The City has also constructively participated in IR 15-296 regarding Grid Modernization, DE 16-576 regarding alternative net metering tariffs, and DE 17-189, Liberty’s battery and time-of-use (TOU) rate pilot, all of which have ramifications, to some extent, in this proceeding, such as the proposed TOU rates for an Electric Vehicle charging tariff.

5. The City has a substantial interest in the issues to be addressed by this docket and the City'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, the City of Lebanon requests that the Commission grant this petition to allow the City to be made a full intervenor in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted this 21st day of May 2019

City of Lebanon

A handwritten signature in cursive script that reads "Clifton Below". The signature is written in black ink and is positioned above a horizontal line.

by Assistant Mayor Clifton Below, duly authorized