

**BEFORE THE PUBLIC UTILITIES COMMISSION
STATE OF NEW HAMPSHIRE**

DE 22-080

New Hampshire Electric Cooperative, Inc.

Petition for Waiver of Portions of Puc 2200 Rules

January 20, 2023

COMMUNITY POWER COALITION OF NEW HAMPSHIRE
PETITION TO INTERVENE

Now Comes the Community Power Coalition of New Hampshire (“CPCNH”) and petitions the New Hampshire Public Utilities Commission, in response to its Order of Notice, issued on December 2, 2022, in this docket and pursuant to NH Code of Administrative Rules Puc 203.02 and Puc 203.17, to allow CPCNH to intervene in the above-captioned matter for the following reasons:

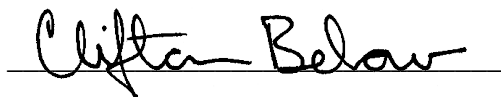
1. CPCNH is a voluntary New Hampshire nonprofit corporation with a principal place of business of City Hall, 51 North Park St., Lebanon, NH 03766 and a mailing address c/o . Sustainability Director, Town of Hanover, 41 S Main Street, Hanover NH 03755
2. CPCNH is a governmental instrumentality of its 27 members comprised of 26 NH municipalities and one county and is organized pursuant to a joint powers agreement under NH RSA 53-A and 53-E:3, II(b). One additional municipality has just recently executed the JPA but has not yet been admitted as members by the Board of Directors of CPCNH.
3. The 2020 census population of CPCNH’s 26 municipal members is more than 21% of the state’s total 2020 census population.
4. CPCNH is in the process of standing up as a functioning joint power supply agency to procure and supply electricity and related services to member community power programs.
5. CPCNH is planning to support the launch of initial member community power aggregations as alternative default energy service providers in the spring of this year pursuant to RSA 53-E and RSA 374-F:2, I-a.

6. All 3 NH investor-owned electric distribution utilities, plus the NH Electric Cooperative, serve member communities and each of CPCNH's member municipalities and county governments are themselves customers of one or more of these utilities.
7. The JPA authorizes CPCNH "to jointly exercise certain powers, privileges, and authorities granted to municipalities and counties pursuant to" a variety of statutes "in order to study, promote, develop, conduct, operate, and manage energy-related programs, and to exercise all other powers necessary and incidental to accomplishing this purpose." Article 7.16 of its Articles of Agreement, part of the JPA, specifically grants CPCNH the power to "[i]ntervene in germane regulatory proceedings on behalf of itself and its Members".
8. CPCNH petitioned the Commission to adopt administrative rules for community power aggregations in DRM 21-142 resulting in the Commission's adoption of Puc 2200 rules that are largely the subject or genesis of this proceeding.
9. CPCNH has a substantial interest in the issues to be addressed by this proceeding, as the rules govern how and at what cost CPCNH interacts with the distribution utilities, directly relating to our statutory authorities under RSA 53-E and other statutes.
10. CPCNH'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, CPCNH requests that the Commission grant this petition to allow CPCNH to be made a full intervenor in this proceeding and grant such other relief as is just and proper.

Respectfully submitted this 20th day of January 2023

Community Power Coalition of New Hampshire



by CPCNH Chair Clifton Below, duly authorized