

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DE 07-108
PSNH 2007 LCIRP

PETITION FOR INTERVENTION

NOW COMES Freedom Logistics, LLC and hereby petitions the New Hampshire Public Utilities Commission for intervention in the above-captioned proceeding pursuant to RSA 541-A:32 and NH Code Admin. Rule Puc 203.17. In support of its Petition for Intervention, Petitioner says the following:

1. Freedom Logistics, LLC specializes in providing high-end management services to large end-users that are Market Participant End-Users (MPEU). An MPEU is a member of NEPOOL and ISO-NE and purchases electricity directly from the ISO-NE hourly wholesale market. Freedom Logistics pioneered the passage of the 99th Amendment to the NEPOOL Agreement that became effective on March 1, 2004. This Amendment permits a Market Participant End-User (MPEU) to participate directly in the hourly NEPOOL Market.

2. Freedom Logistics was also the initiating party in the proceeding before the New Hampshire Public Utilities Commission wherein the Commission determined that it would not have jurisdiction over NEPOOL or ISO-NE if an end-user were to “self-supply” its own electricity needs by participating directly in the NEPOOL market. Petition of Luminescent Systems Inc., NHPUC Order No. 24, 172 (May 13, 2003). There are currently several MPEU’s located in New Hampshire (all clients of Freedom Logistics) purchasing power directly from the ISO-NE hourly wholesale market.


2. PSNH filed its 2007 Least Cost Integrated Resource Plan (2007 LCIRP) with the Commission on September 28, 2007. The LCIRP includes, inter alia, the following components: 1) electric energy and demand forecasts for delivery and energy services under high-, low- and base-case scenarios; 2) the resource balance over the planning period, including an assessment of PSNH’s base-load, intermediate and peaking needs; 3) a systematic evaluation of reasonably available demand-side resources plus a description of the avoided cost methodology and associated avoided cost forecast used for evaluation purposes; 4) generic cost information relating to the construction or acquisition of new generation capacity; 5) a description of the process, including the results of any evaluations used by PSNH, to select the mix of demand-side and supply-side resources included in the resource plan; and 6) the resource plan with which PSNH proposes to fill the resource balance at the lowest cost.

3. The filing raises, inter alia, issues related to whether PSNH's planning process is consistent with RSA Chapter 374, Electric Utility Restructuring. The purpose of Chapter 374 is "to restructure the New Hampshire electric utility industry is to reduce costs for all consumers of electricity by harnessing the power of competitive markets." RSA 374-F:1, I.

5. As an entity providing services to New Hampshire MPEU's, Freedom Logistics has a substantial interest that may be affected by the Commission's deliberations in this proceeding as to whether PSNH's plan will hinder a competitive market in PSNH's service territory.

WHEREFORE, HAEC hereby respectfully requests the Commission to grant it party intervener party status and to order such other and further relief as may be just and equitable.

Respectfully submitted,
Freedom Logistics, LLC
By its Attorney


/s/ James T. Rodier

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Dated: January 23, 2008

Certification of Service

Pursuant to Rules Puc 203.02(2) and Puc 203.11, I have served copy of this petition on each person identified on the commission's service list for this docket.

/s/ James T. Rodier