

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

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Re: New Hampshire Electric Cooperative, Inc. )  
Petition for Waiver of Portions of Puc 2200 Rules )

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Docket No.  
DE 22-080

**PETITION TO INTERVENE  
COLONIAL POWER GROUP, INC.**

Pursuant to the New Hampshire Public Utilities Commission's ("Commission") Commencement of Adjudicative Proceeding and Notice of Prehearing Conference issued on December 2, 2022 in the above-captioned docket, N.H. Code Admin. Rules PUC 203.17, and RSA 541-A:32, Colonial Power Group, Inc. ("Colonial") hereby petitions the Commission for leave to intervene in the above-referenced proceeding. In support of this Petition, Colonial states the following:

1. Colonial is a Massachusetts corporation and maintains its principal office at 5 Mount Royal Avenue, Suite 5-350, Marlborough, MA 01752.
2. Colonial is an energy consultant active in New Hampshire, Massachusetts, and Rhode Island with specific experience advising communities in the establishment, and operation of Community Power Aggregations ("CPAs").
3. In its petition the New Hampshire Electric Cooperative ("NHEC") seeks waiver of several provisions of the Puc 2200 rules. Several waiver requests are temporary (until the end of 2022), some are temporary until implementation of its planned Purchase of Receivables program ("POR"), while others may be permanent. NHEC explains that it expects to satisfy many of the informational requirements in Puc 2200 through "custom programming." For some items, NHEC proposes to make changes to existing EDI configurations and testing requirements in conjunction with its prospective POR filing.
4. Puc 2200 rules were adopted after considerable deliberation through stakeholder meetings and Commission review. The rules were carefully prepared to detail customer information items that the utility companies were required to provide to CPAs. Most such items are essential for the effective functioning of CPAs, while a small number of defined items are highly desirable though not necessarily critical.
5. Colonial applauds and appreciates NHEC's considerable and immediate efforts, just since the adoption of Puc 2200 rules in October 2022, to define a plan and begin work so that it may satisfy a large number of the customer information items in advance of CPA programs launching.

6. Colonial and its municipal clients located within the service territory of NHEC are likely to be substantially and specifically affected by the Commission's findings with respect to these issues.
7. Colonial believes that its inclusion in this proceeding will prove helpful to the Commission and the other parties in several ways. Relying on its extensive experience managing CPA programs in New England, Colonial can confirm information items critical for initial program launch and performance. Colonial's direct involvement will allow for immediate feedback in the event of changes in the timing of deliverables, proposed work-arounds, or proposals for partial deliveries. If needed, Colonial can help troubleshoot issues or brainstorm alternative solutions.
8. Colonial's extensive experience in managing CPAs in close coordination with utility companies is unique and cannot be adequately represented or performed by any other party.

For the foregoing reasons, Colonial hereby requests that the Commission grant its Petition to Intervene in this proceeding as a full party.

Respectfully submitted,  
COLONIAL POWER GROUP, INC.



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Dated: January 26, 2023