



CONSERVATION LAW FOUNDATION

June 29, 2007

HAND DELIVERED

Ms. Debra A. Howland, Executive Director & Secretary
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429



RE: Docket No. DE 07-064; Efficiency Enhancing Electric Utility Rate Mechanism Investigation

Dear Ms. Howland:

Please find enclosed for filing with the Commission an original and seven (7) copies of Intervenor Conservation Law Foundation's ("CLF") Comments Regarding Scope of Proceeding in the above-referenced docket. A copy of this filing has this day been sent electronically, and by U.S. Mail, to all parties on the PUC's service list.

Thank you for your attention to this matter. Please feel free to contact me at 225-3060 should you have any questions or concerns.

Very truly yours,

Thomas F. Irwin
Staff Attorney

TFI/dlh

Encl.

cc: Office of Consumer Advocate
Service List DE 07-064

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STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

Efficiency Enhancing)
Electric Utility Rate Mechanism)
Investigation)

DE 07-064

INTERVENOR CONSERVATION LAW FOUNDATION'S
COMMENTS REGARDING SCOPE OF PROCEEDING

On June 18, 2007, following the Public Utility Commission's (Commission) prehearing conference in the above-captioned docket, Commission staff (staff) and parties attended a technical session. During the technical session, staff and parties discussed the scope of the proceeding, including whether this docket should specifically address matters raised by Mr. Pentti Aalto, Unitil, and others pertaining to distributed generation.

By letter dated June 20, 2007, staff reported to the Commission that the parties agreed to submit comments, on or before June 29, 2007, addressing the scope of this proceeding. In accordance therewith, Intervenor Conservation Law Foundation (CLF) submits the following comments.

This docket provides an important opportunity to re-shape the current regulatory framework by eliminating existing structural utility disincentives to promote energy efficiency, and to encourage investment in energy efficiency and other strategies that reduce electricity consumption, including energy conservation. Reducing electricity consumption by increasing efficiency and conservation is essential to reducing the adverse environmental impacts of energy

production, particularly those related to air quality and greenhouse gas emissions that contribute to global warming.

CLF recognizes that clean distributed generation—excluding, for example, diesel generators—that displaces fossil-fuel generated electricity is an important strategy for reducing the global warming and other environmental impacts of the energy sector. CLF respectfully requests that the scope of this proceeding include rate-making mechanisms that eliminate disincentives for implementing, and affirmatively promote, all strategies designed to reduce electricity consumption, without limitation to the energy efficiency programs currently in existence. CLF further supports inclusion, within the scope of this docket, consideration of mechanisms that eliminate disincentives for, and promote, distributed generation that displaces fossil-fuel energy generation with clean, renewable technologies.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

By: 

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Date: June 29, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this date, June 29, 2007, a copy of the foregoing pleading was sent electronically, and by First Class U.S. Mail, to:

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A handwritten signature in black ink, reading "Thomas F. Irwin". The signature is written in a cursive style with a large, stylized "T" and "I".

Thomas F. Irwin, Esq.