

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

**Docket No. DE 15-137**

**ELECTRIC AND GAS UTILITIES**

**Energy Efficiency Resource Standard**

**PETITION TO INTERVENE  
OF CONSERVATION LAW FOUNDATION**

Pursuant to the Commission's Order of Notice dated May 8, 2015, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32, the Conservation Law Foundation ("CLF") hereby petitions for leave to intervene in the above-captioned docket. In support of its petition, CLF states the following:

1. CLF is a private, non-profit membership organization dedicated to protecting New England's environment for the benefit of all people. CLF uses the law, science, and the market to create solutions that build healthy communities, sustain a vibrant economy, and preserve natural resources, including resources affected by the generation, transmission, and distribution of electric power and the transportation and use of natural gas. Consistent with its mission to promote thriving, resilient communities, CLF is dedicated to advancing policies that promote a clean energy future and that strengthen New England's—and New Hampshire's—economic vitality. CLF has over 4,100 members, including approximately 500 members residing in New Hampshire.

2. As set forth in the Order of Notice, this docket seeks to establish an Energy Efficiency Resource Standard ("EERS") for New Hampshire. It will define the savings targets for the electric and gas utilities in the state and address issues related to public and private funding; program-cost recovery; lost-revenue recovery such as decoupling; performance-based

incentives and penalties; program administration; evaluation, measurement and verification; and transitioning existing efficiency programs to an EERS. These issues raise important economic and environmental matters which, as set forth below, affect the rights, duties, and privileges of CLF and its members.

3. CLF represents itself and the interests of its members in securing the many economic and environmental benefits associated with increased energy efficiency deployment. Increased energy efficiency provides a means towards achieving state and regional climate change mitigation and environmental goals, decreases ratepayer costs, and fosters economic sustainability.

4. Energy efficiency has been a major CLF priority since it spearheaded the publication in 1987 of “Power to Spare,” which was the first comprehensive, regional effort to assess the economic and technical potential for increased energy efficiency and to set a policy and action agenda for public officials and utilities to achieve that potential.<sup>1</sup> “Power to Spare” laid the groundwork for the energy efficiency programs underway throughout New England.

5. Since “Power to Spare,” CLF’s work has included a wide range of advocacy to advance the region’s energy efficiency policies, including those administered by state public utility commissions. In this regard, CLF has a long record of constructively intervening in Commission dockets here in New Hampshire regarding energy efficiency, including the 2011-2012 CORE docket (DE 10-188) and the Commission’s last in-depth consideration of decoupling (DE 07-064). More recently, CLF provided comments related to energy efficiency as part of the 2014 State Energy Strategy stakeholder process and during the Commission Staff’s investigation of an energy efficiency resource standard (IR 15-072 and informal Staff interview in 2014).

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<sup>1</sup> New England Energy Policy Council, Power to Spare: A Plan for Increasing New England’s Competitiveness Through Energy Efficiency (1987), at [http://web.mit.edu/jjay/Public/EE/Power\\_to\\_Spare\\_1987\\_medium.pdf](http://web.mit.edu/jjay/Public/EE/Power_to_Spare_1987_medium.pdf)

6. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. The design and implementation of an energy efficiency resource standard are likely to have a significant impact on the nature, availability, extent, scope, and success of New Hampshire's energy efficiency programs. Intervention will allow CLF to represent the interests of CLF members who are New Hampshire utility customers who stand to benefit from the direct and indirect cost savings associated with energy efficiency investments and CLF members who will enjoy fewer public health and environmental impacts from other energy sources with greater deployment of energy efficiency.

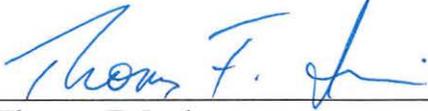
7. CLF's institutional expertise in energy efficiency matters and its deep experience with state and regional energy issues will inform its participation and benefit the Commission's consideration of the issues pertinent to its decisions in this docket. In this regard, CLF's policy and program experience includes over twenty years of extensive collaborative work and participation in numerous utility commission dockets throughout New England, including DR 97-211, DE 01-057, DE 07-064, DE 08-103, DE 08-145, DE 09-033, DE 10-160; DE 10-188; DE 11-215; DE 11-250; DE 13-108; DE 13-275; DE 14-120; and DE 14-238 in New Hampshire.

8. Allowing CLF to intervene will not impair the orderly and prompt conduct of the proceedings. In this regard, CLF is open to innovative approaches to briefing, discovery, hearings, and settlement that will focus the proceeding in appropriate ways.

WHEREFORE, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION



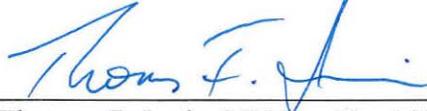
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Thomas F. Irwin  
Vice-President and Director, CLF New Hampshire  
Conservation Law Foundation  
27 N. Main Street  
Concord, NH 03301  
(603) 225-3060  
[tirwin@clf.org](mailto:tirwin@clf.org)

Dated: May 28, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing petition has on this 28th day of May 2015 been sent by email to the service list in Docket No. DE 15-137.



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Thomas F. Irwin (NH Bar No. 11302)  
Vice-President and Director, CLF New Hampshire