

THE STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

GAS AND ELECTRIC UTILITIES

ENERGY EFFICIENCY RESOURCE STANDARD

Docket No. DE 15-137

**RESPONSE TO MCR PERFORMANCE SOLUTIONS, LLC PETITION TO
INTERVENE OUT OF TIME**

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities; New Hampshire Electric Cooperative, Inc.; Public Service Company of New Hampshire d/b/a Eversource Energy; Unitil Energy Systems, Inc.; Liberty Utilities (EnergyNorth Natural Gas) Corp d/b/a Liberty Utilities; and Northern Utilities, Inc. (collectively, “the Electric and Natural Gas Utilities”), hereby provide a response to Petition to Intervene Out of Time filed on March 4, 2016 by MCR Performance Solutions, LLC (“MCR”):

1. The Commission commenced this docket through an order of notice issued on May 8, 2015, which followed on its investigation in Docket No. IR 15-072. The order of notice provided that requests to intervene were to be filed by May 29, 2015. On March 4, 2016, and while acknowledging its delay, MCR requested to intervene.

2. In requesting to intervene MCR noted that its interest was that of a “non-Party, public participant” and that it intended to participate in the docket only in an “advisory capacity.” MCR Petition at ¶¶ 3-4. It also noted that it did not intend to conduct cross examination or offer evidence. In light of the substantial amount of time that has passed in the docket, and the amount of work already completed, the Electric and Natural Gas Utilities are concerned that permitting new intervention may create delays in the process. Further, in light of MCR’s

description of itself as a “public participant” that wishes to participate only in an “advisory capacity,” it is not clear to the Electric and Natural Gas Utilities how MCR’s participation would differ from that of any other member of the public, nor is it clear why intervenor status would be appropriate or necessary. Accordingly, in the opinion of the Electric and Natural Gas Utilities it may be more appropriate for MCR to participate as a member of the public, and be permitted to make public comments, rather than have MCR participate as an intervenor.


3. Should the Commission determine that MCR may be an intervenor, MCR has stated that it would accept the schedule as it stands, along with any additional conditions or limitations the Commission may impose. The Electric and Natural Gas Utilities recommend that if the petition is granted, the Commission only do so under conditions that will ensure there is no disruption to the schedule or the process that has been underway for nearly a year.

4. Accordingly, the Electric and Natural Gas Utilities request that the Commission consider this response when ruling upon the pending request from MCR.

WHEREFORE, the Electric and Natural Gas Utilities respectfully request that the Commission:

- A. Consider this response; and
- B. Order such relief as may be just and reasonable.

Respectfully submitted this 11th day of March, 2016.

By: 

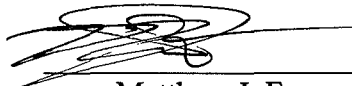
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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

March 11, 2016
Date



Matthew J. Fossum