

STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION
DE 07-064
Investigation into Energy Efficiency Rate Mechanisms

PETITION OF ENVIRONMENT NORTHEAST TO INTERVENE OUT OF TIME

Environment Northeast (“ENE”) submits this Petition to Intervene Out of Time (“Petition”) pursuant to N.H. Rev. Stat. Ann. § 541-A:32 and N.H. Code Admin. Rule PUC § 203.17. In support of its Motion, ENE states the following:

1. ENE is a non-profit organization which addresses large-scale environmental challenges that threaten regional ecosystems, human health, or the management of significant natural resources. ENE uses policy analysis, collaborative problem solving, and advocacy to advance the environmental and economic sustainability of the northeastern United States and eastern Canada.

2. ENE experts have written extensively about the link between energy efficiency programs and decoupling mechanisms, including our 2006 Climate Change Roadmap for New England and Eastern Canada.¹ ENE has participated actively in public utility dockets relating to revenue decoupling in Connecticut, Massachusetts and Rhode Island. Moreover, ENE staff members hold seats on a number of the state energy advisory boards where efficiency programs are implemented, including the Energy Conservation Management Board in Connecticut, the Energy Efficiency and Resources Management Council in Rhode Island and the newly created Maine Energy Conservation Board.

¹ See <http://www.env-ne.org/public/resources/pdf/RoadmapSummary.pdf>

3. The purpose of the Commission's investigation is to "investigate the merits of instituting... appropriate rate mechanisms, such as revenue decoupling, which would have the effect of removing obstacles to, and encouraging investment in, energy efficiency."² ENE has been a strong supporter of the concept of revenue decoupling and wishes to participate in Docket 07-064 because it believes that its research and experience will be helpful in the Commission's consideration of the issues in this docket.

4. ENE's Petition, although after the June 13, 2007 date set in the Commission's Order of Notice, should nevertheless be granted. Under RSA 541-A:32 II, "The presiding officer may grant one or more petitions for intervention at any time, upon determination that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings."

5. ENE's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. ENE spends considerable time, effort, and resources working to ensure that least cost energy efficiency resources are procured in the New England states to mitigate environmental harm, including but not limited to those harms associated with climate change and local air pollution, while reduce reducing costs for energy consumers. ENE has unique expertise in this matter that is not able to be adequately represented by other parties and ENE's interests are directly affected by this proceeding.

6. ENE brings significant regional experience to this proceeding and its contributions would be in the interests of justice. Moreover, granting the Petition will not impair the interests of justice and the orderly and prompt conduct of the proceedings because it is being filed before any substantive matters have been determined by the Commission.

² NH PUC, Order of Notice, Docket 07-064, May 14, 2007 at 1.

Wherefore, ENE respectfully requests that the Commission grant its Petition.

Respectfully submitted,

ENVIRONMENT NORTHEAST

By its attorneys,



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Dated: May 27, 2008

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May, 2008, a copy of this document was sent electronically to all parties and individuals listed on the Service List for Docket 07-064.

