

# CONSERVATION LAW FOUNDATION

June 13, 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 eight (8) copies of the Conservation Law Foundation's ("CLF") Petition for Intervention in the above-referenced docket. A copy of this Petition has this day been sent electronically, and by U.S. Mail, to all parties.

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,

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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 DE 07-064 June 13, 2007

Efficiency Enhancing
Electric Utility Rate Mechanism
Investigation

## PETITION FOR INTERVENTION <u>BY</u> THE CONSERVATION LAW FOUNDATION

Pursuant to the Order of Notice issued on May 14, 2007 by the New Hampshire Public Utilities Commission ("Commission") in the above-captioned docket, the 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 this proceeding. In support of its petition, CLF states the following:

1. CLF is a private, non-profit environmental membership organization dedicated to the protection and responsible use of New England's natural resources, including resources affected by the generation, transmission and distribution of electric power. CLF represents the interests of its members in ensuring that environmental impacts resulting from electric utility operation in New Hampshire and the region are minimized. To that end, CLF is an active proponent of measures to promote energy efficiency.

2. CLF has over 4,200 members, including more than 500 members residing in New Hampshire. CLF and CLF's New Hampshire members may be directly and substantially affected by this proceeding. Intervention will allow CLF to protect its members' substantial interests in

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such matters as encouraging the promotion of energy efficiency and thereby reducing the environmental and health impacts of electricity generation. The economic interests of CLF's New Hampshire members as ratepayers also may be directly affected by this proceeding. CLF's primary interest is to promote energy efficiency and ensure fair rate structures.

3. In this docket, the Commission will "investigate the merits of instituting, for electric utilities, appropriate rate-mechanisms, such as revenue decoupling, which would have the effect of removing obstacles to, and encouraging investment in, energy efficiency." Order of Notice DE 07-064 at 1. This proceeding presents an important opportunity for CLF to provide input regarding these matters and how they affect the interests of CLF and its members.

4. CLF's experience with energy efficiency policies and programs includes over twenty years of extensive collaborative work and participation in numerous utility commission dockets throughout New England, including DR 97-211 in New Hampshire. CLF's institutional expertise in these matters will inform its participation and benefit the investigation.

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

By:

Respectfully submitted,

#### CONSERVATION LAW FOUNDATION

Thomas F. Irwin Staff Attorney Conservation Law Foundation 27 North Main Street Concord, New Hampshire 03301-4930 Tel.: (603) 225-3060 Fax: (603) 225-3059 tirwin@clf.org

Dated: June 13, 2007

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#### CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of June, 2007, a copy of the foregoing Petition for Intervention by the Conservation Law Foundation was sent electronically, and by First Class U.S.

Mail, to:

Patrick J Arnold Campaign for Ratepayers Rights PO Box 563 Concord, NH 03302

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Gary Epler Unitil Energy Systems Inc 6 Liberty Lane West Hampton, NH 03842-1720 Meredith A Hatfield Office of Consumer Advocate 21 South Fruit St Ste 18 Concord, NH 03301

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Robert D Shapiro Rubin and Rudman LLP 50 Rowes Wharf Boston, MA 02110-3319

Ken E Traum Office of Consumer Advocate 21 South Fruit St Ste 18 Concord, NH 03301-2429 Dated in Concord, New Hampshire this 13th day of June.

<u>[Nor</u>

Thomas F. Irwin Staff Attorney Conservation Law Foundation 27 North Main Street Concord, New Hampshire 03301-4930 Tel.: (603) 225-3060 Fax: (603) 225-3059 tirwin@clf.org