

STATE OF NEW HAMPSHIRE

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 14-216

2014 CORE Energy Efficiency Programs

MOTION TO INTERVENE OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES


NOW COMES the New Hampshire Department of Environmental Services (DES) pursuant to PUC 203.02 and RSA 541-A:32,I(b) and requests leave to intervene in the above captioned matter. In support of this motion, DES states as follows:

1. DES is responsible for implementing laws and regulations that are protective of public health and the environment.
2. Fossil-fuel burning electric power plants emit substantial quantities of air pollutants such as sulfur dioxide, nitrogen oxides, particulate matter, and mercury. In addition, electricity production is responsible for approximately one third of the greenhouse gas emissions generated in New Hampshire. Energy efficiency measures, which avoid having to generate electricity, avoid emissions of all pollutants. Front-end pollution prevention strategies, such as energy efficiency and conservation, eliminate emissions of harmful pollutants to the air rather than just diminish them or shift their environmental impact to another media such as water or land.
3. DES has a direct interest in the issues raised by the utilities' filing in this docket, especially as they pertain to the design and delivery of energy efficiency programs and the potential interaction with the forward capacity market as well as the use of funding for energy efficiency programs generated from the Regional Greenhouse Gas Initiative. DES was an active participant in the stakeholder process leading to the creation of the CORE programs in 2002, and has intervened in subsequent CORE dockets. DES's intervention will not impair the orderly conduct of the proceedings.

WHEREFORE, DES requests that the Commission grant this motion, allow DES to intervene in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted,

NEW HAMPSHIRE DEPARTMENT OF
ENVIRONMENTAL SERVICES

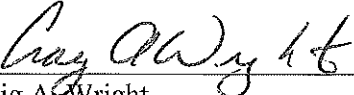


Craig A. Wright
Director
Air Resources Division

Certificate of Service

I certify that on this date a copy of the foregoing was hand-delivered to PUC staff and sent via electronic mail or first-class United States mail to the Utilities and all other persons on the DE 14-216 Service List.

September 8, 2014



Craig A. Wright
Director, Air Resources Division
NH Department of Environmental Services

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:

DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
- c) Serve a written copy on each person on the service list not able to receive electronic mail.