

Borrego Solar Systems, Inc.
55 Technology Drive, Suite 102 Lowell, MA 01851
Tel: 978-513-2600, Fax: 617-208-1288
www.borregosolar.com



STATE OF NEW HAMPSHIRE BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

**PETITION FOR AUTHORIZATION PURSUANT TO RSA 362-A:2-A, II FOR A PURCHASE OF LEEPA
OUTPUT BY THE PRIVATE SECTOR**

DE 15-068

Petition to Intervene of Borrego Solar Systems, Inc.

NOW COMES Borrego Solar Systems, Inc (Borrego Solar) a California corporation, and, pursuant RSA 541-A:32 and N.H. Admin. R. Rule Puc 203.17, and respectfully petitions the New Hampshire Public Utilities Commission ("Commission") for intervention as a full party in the above-captioned proceeding. In support of this petition, Borrego Solar states as follows:

1. The Commission opened this proceeding on April 7, 2015 with an Order of Notice stating, in part, that this proceeding will address "issues related to the interpretation of RSA 362-A:2-A, II under LEEPA, and the terms and conditions of agreements and arrangements pursuant to which the electrical output of the limited electrical energy producer will be sold to the end user and wheeled by the franchised electric distribution utility from the producer to the end user."

2. The statutory standards for intervention are set forth in RSA 541-A:32, I and II. First, a petition for intervention must be granted if the petitioner states facts demonstrating how its rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding (or the petitioner qualifies under any provision of law) and the interests of justice and orderly and prompt conduct of the proceedings would not be impaired by allowing intervention. See RSA 541-A:32, I(b) and (c). Second, the Commission may grant a petition to intervene "at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly conduct of the proceedings." RSA 541-A:32,II. See also N.H. Admin. R. Puc 203.17 (requiring the Commission to grant one or more petitions to intervene in accordance with the standards of RSA 541-A:32).

3. Borrego Solar is a developer of commercial scale DG solar projects in New Hampshire. With the rapid deployment and growing interest for renewable energy in the state, the 50MW net metering cap, and no certainty for a legislative increase to the cap or utility appetite for voluntarily exceeding the cap, Borrego Solar sees limited options to expand its business in NH providing jobs and renewable energy to support local economies.

4. The Commission's authorization of the transaction at issue in this proceeding pursuant to RSA 362-A:2-A, II under LEEPA will allow the development of projects up to 5MW AC in size. Projects of this size achieve the necessary economies of scale to build these facilities with significantly reduced state incentives. This mechanism will allow for energy stability for NH businesses and encourage economic growth in the state.

Borrego Solar Systems, Inc.
55 Technology Drive, Suite 102 Lowell, MA 01851
Tel: 978-513-2600, Fax: 617-208-1288
www.borregosolar.com



5. As the foregoing information demonstrates, Borrego Solar has knowledge and experience that are likely to be of value to the Commission and other parties in this proceeding. Borrego Solar's intervention will not impair the orderly conduct of this proceeding and, thus, granting this petition for intervention would be in the interest of justice.

6. The Petitioner in this proceeding has no objection to this petition for intervention.

WHEREFORE Borrego Solar respectfully requests that the Commission grants it full intervener status in the proceeding and grant such other relief as the Commission deems just and equitable.

Respectfully submitted,
Borrego Solar Systems, Inc
Chris Anderson, CTO, Co-Founder
55 Technology Drive, Suite 102 Lowell, MA 01851
canderson@borregosolar.com

Borrego Solar Systems, Inc.
55 Technology Drive, Suite 102 Lowell, MA 01851
Tel: 978-513-2600, Fax: 617-208-1288
www.borregosolar.com



Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 23rd day of July, 2015 been sent by electronic mail to persons listed on the Service List for this proceeding.

By:

Chris Anderson