

STATE OF NEW HAMPSHIRE

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 15-137

Energy Efficiency Resource Standard

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 resources standards establish efficiency targets that avoid the need to generate a specified amount of electricity, thus avoiding emissions of all pollutants.
3. DES has a direct interest in the issues to be addressed by this docket. 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

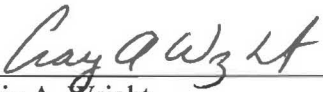


Craig A. Wright
Director
Air Resources Division

Motion of New Hampshire Department of Environmental Services
Certificate of Service

I certify that on this date the original and six (6) copies of the foregoing were hand-delivered to the PUC and sent via electronic mail to the Utilities and all other persons on the DE 15-137 Service List.

May 19, 2015



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