

**BEFORE THE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 15-271

ELECTRIC DISTRIBUTION UTILITIES

**Examination of Electric Distribution Utility Interconnection and Queue
Management Processes for Net-Metered Customer-Generators**

PETITION TO INTERVENE OF THE ALLIANCE FOR SOLAR CHOICE

Pursuant to New Hampshire Code of Administrative Rules 203.17 and Revised Statutes § 541-A:32, The Alliance for Solar Choice (TASC), by and through its undersigned counsel, respectfully submits this Petition to Intervene (Petition) in the above proceeding.

1. Introduction

TASC leads advocacy across the country for the rooftop solar industry. TASC's members represent the vast majority of the nation's rooftop solar market and include Demeter Power, Silevo, SolarCity, Solar Universe, Sunrun, Verengo, and ZEP Solar.

The rooftop solar market in New Hampshire has been driven by New Hampshire residents' desire to assert control over their electric bills, and TASC strongly supports the continuation of this trend. TASC is committed to offering the state's citizens a viable choice in energy providers and providing near-term, low-cost and customer-based solutions to integrate renewable energy resources and improve operational efficiencies that preserve both the health of the solar industry and the public interest at large.

TASC has a substantial interest in this proceeding and TASC's intervention will not impair the interests of justice and orderly and prompt conduct. TASC therefore respectfully requests that the New Hampshire Public Utilities Commission (Commission) grant this Petition.

2. TASC's rights, duties, privileges or other substantial interests will be affected by this proceeding

TASC and its members have a direct and substantial interest in this proceeding. The Commission has opened this proceeding with the objective of developing “uniform, just, and reasonable guidelines for utility management of net metering applicant queues, as well as examining interconnection requirements, to determine whether uniform interconnection queue management procedures would be useful in managing net metering applicant queues.”¹ This proceeding was prompted by a memorandum from the Commission’s Sustainable Energy Division Staff recognizing that a number of utilities are approaching their limits under the 50 megawatt net metering program aggregate requirement, with one utility already exceeding its share of that limit.²

TASC members’ New Hampshire business operations include planning, developing, installing, selling or leasing, monitoring and maintaining solar photovoltaic systems that interconnect to New Hampshire utilities’ networks under the state’s net metering program. Because the proceeding will address interconnection requirements, including interconnection applications and queue management, the outcome of this proceeding will directly impact TASC members’ core business models and product offerings and TASC members’ ability to continue to further New Hampshire’s clean energy and distributed generation goals.

3. The interests of justice and orderly and prompt conduct will not be impaired by allowing TASC to intervene in this proceeding

TASC’s intervention will not impair the interests of justice or the orderly and prompt functioning of this proceeding. TASC’s participation in this proceeding will be limited to the

¹ Order of Notice, DE 15-271 (Jul. 7, 2015) at p. 1.

² *Id.*

scope of issues and timelines the Commission establishes, thereby ensuring the orderly and prompt conduct of this proceeding.

4. Conclusion

For the foregoing reasons, TASC respectfully requests that the Commission grant this Petition.

Respectfully submitted,

/s/ Joseph F. Wiedman

Joseph F. Wiedman
KEYES, FOX & WIEDMAN LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Telephone: 510-314-8202
Email: jwiedman@kfwlaw.com
(CA Bar #234302)

Counsel for The Alliance For Solar Choice

July 28, 2015

Certificate of Service

RE: DE 15-271, Electric Distribution Utilities Examination of Electric Distribution Utility Interconnection and Queue Management Processes for Net-Metered Customer-Generators

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record in this proceeding in accordance with the requirements of N.H. Admin. Rule Puc 203.11, in the manner and upon the persons listed below:

Dated this 28th of July 2015.

SERVICE BY FIRST CLASS U.S. MAIL, POSTAGE PREPAID

Debra Howland
NHPUC, Executive Director
21 South Fruit Street, Suite 10
Concord, NH 03301-2429
(1 Original, 6 Copies)

SERVICE BY ELECTRONIC MAIL

Debra Howland
NHPUC, Executive Director
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
Executive.Director@puc.nh.gov

Mark Dean
Attorney-At-Law
13 Samuel Dr,
Concord, NH 03301
mdean@mdeanlaw.net

Jill Fitzpatrick
Steven Hall
Steven Mullen
Liberty Utilities
15 Buttrick Rd,
Londonderry, NH 03053
jill.fitzpatrick@libertyutilities.com
Stephen.Hall@libertyutilities.com
steven.mullen@libertyutilities.com

Allen Desbiens
Christopher Goulding
Matthew Fossum
Richard Labrecque
Eversource Energy
780 N Commercial St, PO Box 330
Manchester, NH 03105-0330
allen.desbiens@nu.com
christopher.goulding@nu.com
matthew.fossum@eversource.com
richard.labrecque@nu.com

Steven Kaminski
Gary Lemay
Heather Manypenny
NH Electric Cooperative
579 Tenney Mtn Hwy,
Plymouth, NH 03264-3154
kaminski@nhec.com
lemayg@nhec.com
manypennyh@nhec.com

Kate Epsen
NH Sustainable Energy Assn.
54 Portsmouth St,
Concord, NH 03301
kate@nhsea.org

Amanda Noonan
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
amanda.noonan@puc.nh.gov

Barbara Bernstein
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
barbara.bernstein@puc.nh.gov

David Wiesner
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
david.wiesner@puc.nh.gov

Liz Nixon
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
elizabeth.nixon@puc.nh.gov

Grant Siwinski
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
grant.siwinski@puc.nh.gov

Jon Osgood
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
jon.osgood@puc.nh.gov

Karen Cramton
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
karen.cramton@puc.nh.gov

Michael Sheehan
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
michael.sheehan@puc.nh.gov

Michael Sisto
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
michael.sisto@pub.nh.gov

Stephen Eckberg
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
Stephen.Eckberg@puc.nh.gov

Suzanne Amidon
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
suzanne.amidon@puc.nh.gov

Tom Frantz
NHPUC
21 S Fruit Street, Suite 10
Concord, NH 03301-2429
tom.frantz@puc.nh.gov

Andrew Kellar
NhSolarGarden.com LLC
74 Union Rd,
Stratham, NH 03885
andrew@nhsolargarden.com

Douglas Patch
Orr & Reno PA
45 S Main St, PO Box 3550
Concord, NH 03302
dpatch@orr-reno.com

Attorney for
NhSolarGarden.com LLC

Susan Chamberlain
Jim Brennan
Wayne Jortner
Office of Consumer Advocate
21 S Fruit Street, Suite 18
Concord, NH 03301-2429
susan.chamberlain@oca.nh.gov
james.brennan@oca.nh.gov
wayne.jortner@oca.nh.gov

Douglas Debski
Gary Epler
Thomas Palma
Unitil Energy Systems Inc.
6 Liberty Ln West,
Hampton, NH 03842
debski@unitil.com
epler@unitil.com
palma@unitil.com

Blake Elder

Blake Elder
Keyes, Fox & Wiedman LLP
401 Harrison Oaks Blvd, Suite 100
Cary, NC 27513
(919) 825-3339
belder@kfwlaw.com