



For a thriving New England

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April 11, 2016

Debra A. Howland, Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, N.H. 03301

**RE: Investigation into Grid Modernization, Docket IR 15-296;
Request of Conservation Law Foundation to Participate in the Working Group**

Dear Ms. Howland,

Pursuant to Order No. 25,877, issued by the State of New Hampshire Public Utilities Commission on April 1, 2016, Conservation Law Foundation (“CLF”) submits this request to participate in the upcoming Grid Modernization Working Group.

In support of its request to participate, CLF states as follows:

1. CLF is a private, non-profit 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 has approximately 3,300 members in New England, nearly 500 of whom reside in New Hampshire.
2. Founded in 1966, CLF has a long history of participation in proceedings before state utility commissions, ISO-New England (“ISO-NE”), and federal agencies in a wide range of energy matters. CLF has extensive experience in the operation of New England’s wholesale electricity markets: CLF has long been a market participant in the New England Power Pool (“NEPOOL”), the stakeholder entity legally sanctioned by the Federal Energy Regulatory Commission to monitor ISO-NE, and CLF attorneys sit on all of the committees that are responsible for making recommendations and determinations concerning ISO-NE’s regional planning, markets and transmission functions. CLF has authored and influenced energy legislation throughout the region, and has played a key role in the development of numerous state renewable energy laws including the Regional Greenhouse Gas Initiative (“RGGI”), renewable portfolio standards and energy efficiency laws and regulations.
3. CLF’s involvement in New Hampshire energy matters has spanned the past two decades and includes intervention in numerous dockets before the state’s Public Utilities Commission, such as: DR 97-211, DE 01-057, DE 07-064, DE 08-103, DE 08-145, DE 09-033, DE 10-160; DE 10-188; DE 11-215; DE 11-250; DE 13-108; and DE 13-275, DE 14-120, DE 14-238, DE 15-124, IR 15-124, and IR 15-137.

4. The promotion of renewable energy, distributed energy resources, and energy efficiency are among CLF's top priorities in New Hampshire. CLF is currently a participating intervenor in DE 15-137, pertaining to the establishment of an Energy Efficiency Resource Standard, and expects to intervene in the net metering-related proceeding anticipated to be initiated at the Commission in a matter of weeks.
5. CLF has participated in grid modernization and related proceedings in Massachusetts (e.g., Mass. D.P.U. Docket Nos. 07-50 and 12-76), Rhode Island (e.g., R.I. Pub. Util. Comm. Docket Nos. 4545, 4568, 4600), and Maine (e.g., Me. Pub. Util. Comm. Docket Nos. 2015-00157, 2016-00049).
6. CLF continues to be a full litigant in Rhode Island and Providence Plantations Public Utilities Commission Docket No. 4600, regarding the modernization of the grid in that state. CLF staff were principal drafters of the Rhode Island renewable energy statutes – including those governing net metering and those pertaining to distributed generation – that gave rise to Rhode Island's grid modernization proceedings.
7. CLF has recently filed for intervention before the Massachusetts Department of Public Utilities in Docket Nos. 15-122/15-123, pertaining to the grid modernization plans of NSTAR Electric Company and Western Massachusetts Electric Company d/b/a Eversource Energy. CLF expects to be an active participant and litigant in that proceeding.
8. CLF has been an active participant in several past and ongoing dockets before the Maine Public Utilities Commission concerning grid modernization, non-transmission alternative coordination, and smart grid optimization. As part of a stipulation involving Central Maine Power, CLF was a significant contributor to the design of a non-transmission alternative (“NTA”) pilot project that is ongoing in the Boothbay region of Maine. The resulting proceeding has broadened to include investigations into similar NTA solutions for the Mid-Coast and Portland areas of the state. *See* Request for Approve of NTA Pilot Projects for the Mid-Coast and Portland Areas, Me. Pub. Util. Comm. Docket No. 2011-00138. CLF is active in the docket and the process of identifying and considering NTA solutions or hybrid NTA solutions for the Mid-Coast and Portland regions.
9. Maine has a Smart Grid Policy Act intended, among other purposes, to improve the reliability and efficiency of the electric grid. This act allows for designating a Smart Grid Coordinator. CLF has been an active intervenor in several proceedings before the Maine Public Utilities Commission to determine the contours of a Smart Grid Coordinator or NTA Coordinator. *See, e.g.*, Investigation into Designating an NTA Coordinator Pursuant to 35-A M.R.S. § 3143(5), Me. Public Util. Comm., Docket No. 2015-00157; Investigation into the Designation of Non-Transmission Alternative (NTA) Coordinator, Me. Public Util. Comm., Docket No. 2016-00049. These ongoing investigations involve many of the same considerations as the planned proceeding in New Hampshire. Such issues include increased use of digital information and control technologies to improve grid reliability, deployment



and integration of renewable capacity resources, greater integration of demand response and energy efficiency, improved utilization of existing AMI, SCADA system design, deployment and integration of electric storage and peak-reduction technologies, and a host of other smart grid functions and operations. Efforts to improve the electric grid around the region and beyond—such as in New York’s REV proceeding—provide valuable opportunities for CLF to enhance its participation in and contributions to these collaborative processes.

10. CLF’s role as a premier non-profit expert on energy and environmental issues across the region and in New Hampshire, and specifically its experience with renewables including distributed generation, smart grid, and grid modernization issues enable our organization to be an active and valuable participant in the proposed Grid Modernization Working Group. I have been an energy attorney since 2009, and have prior experience with smart grid, grid modernization, and utility of the future issues in the Mid-Atlantic.
11. I respectfully request that I be designated as the primary participant on behalf of CLF, with Tom Irwin, Vice President and Director of CLF New Hampshire, as an alternate.
12. Our contact information is as follows:

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Thank you for your consideration. Please do not hesitate to be in touch with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. E. Birchard", is written over a light blue horizontal line.

Melissa E. Birchard*
Staff Attorney

*Barred in the District of Columbia; License Pending in New Hampshire.