

May 27, 2016

State of New Hampshire
Public Utilities Commission

DE 16-384

Unitil Energy Systems, Inc
Request for a Change in Rates

Petition for Intervention

The NH Sustainable Energy Association ("NHSEA") submits this Petition for Intervention in the above referenced docket, and states the following:

1. NHSEA is a statewide nonprofit organization, which educates and advocates for clean energy in New Hampshire. We have residential, institutional and business members across the state of NH. Our mission is to strengthen New Hampshire's economy and conserve natural resources by promoting a transition to clean, efficient, and renewable energy.
2. On April 29, 2016, Unitil Energy Systems Inc. ("Unitil"), filed a petition for authority to (1) implement new permanent rates beginning June 1, 2016, for electric service at the levels set forth in its proposed revised tariff filed with the petition; (2) replace certain pages of Unitil's current tariff, NHPUC No. 3, with proposed revised tariff pages; (3) implement a 5-year Rate Plan with step adjustments for certain future rate base additions and programs to enhance reliability and manage vegetation; and (4), if the Commission suspends the effective date of Unitil's permanent rates, implement temporary rates beginning July 1, 2016, for electric service at rate levels set forth in Supplement No. 2 to NHPUC No. 3.
3. NHSEA has an interest in pursuing greater deployment of energy efficiency and renewable energy as a guiding policy for NH's energy future. NHSEA has participated in many proceedings before the PUC in the past on behalf of clean energy practices and regulation in NH. NHSEA also participated extensively in the creation of the ten-year state energy strategy
4. NHSEA and its members will be substantially and specifically affected by this proceeding. Unitil's proposals at issue in this proceeding pose a risk to NHSEA's core interests. Specifically, NHSEA is concerned that Unitil's proposals would make energy efficiency and distribution generation less affordable, and would create a disincentive to utilizing these energy resources, thereby reducing or negatively affecting opportunities for adoption of these resources. Additionally, NHSEA's

members who are Unitil's ratepayers will be affected if the Commission approves Unitil's petition as filed because the proposed tariffs would increase all ratepayers' monthly charges and would create a separate rate class for distributed generation customers.

5. NHSEA believes that Commission consideration of the Unitil proposal specific to its Domestic Distributed Energy Resources ("DDER") tariff is inappropriate under this rate proceeding, and would be more appropriately considered under the Commission docket DE 16-576, *Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators*. Accordingly, NHSEA requests that the Commission remove consideration of the DDER tariff from DE 16-384 and consider it in the context of DE 16-576.
6. NHSEA is partnering with Vote Solar to provide expert testimony in the immediate docket. Vote Solar is a non-profit grassroots organization working to foster economic opportunity by bringing solar energy into the mainstream. Vote Solar's principal office is located at 360 22nd Street, Suite 730, Oakland, CA 94612, and its Boston office is located at 89 South Street, Suite 203, Boston, MA 02111.
7. Vote Solar has extensive expertise concerning rate design and other policies related to distributed solar generation. Its participation will therefore aid the Commission's consideration of this case by elucidating key issues related to distributed solar generation and other clean energy resources. Vote Solar is particularly and uniquely focused on rate design and public policy issues related to distributed solar generation and net metering. Recognizing the importance of programs and regulatory constructs for supporting customer-sited and other forms of distributed solar, Vote Solar has actively participated since 2002 in commission proceedings concerning net metering, interconnection design, resource procurement, and distributed generation program design in numerous states across the country, including in Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Maryland, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, Utah, Vermont, and Wisconsin.
8. NHSEA's participation in the proceeding is in the interest of justice and will not disrupt the orderly conduct of this proceeding, or delay the proceedings. NHSEA seeks to intervene in this proceeding to present legal, policy, and technical analyses and evidence related to Unitil's proposals presented in this case, and thereby assist the Commission's consideration of Unitil's petition and advance the just resolution of the proceeding. NHSEA's and Vote Solar's expertise with respect to rate design and policies related to distributed generation ensures that NHSEA's intervention will not be duplicative of other parties and will help facilitate an expeditious result. If NHSEA's request in #5 above were granted, it would withdraw its petition for intervention in this proceeding.

The NH Sustainable Energy Association respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

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Kate Epsen
Executive Director

Certificate of Services

I certify that on this date a copy of the foregoing was hand-delivered to the NH PUC and the Office of Consumer Advocate, and sent electronically to Unitil and all other parties on the Service List in DE 16-384.

A handwritten signature in black ink, appearing to read 'Kate Epsen', followed by a long horizontal flourish.

Kate Epsen
Executive Director

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