

STATE OF NEW HAMPSHIRE

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 17-136

2018 Energy Efficiency Resource Standard

MOTION TO INTERVENE OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES

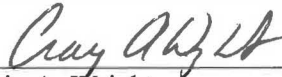
NOW COMES the New Hampshire Department of Environmental Services (NHDES) pursuant to PUC 203.02 and RSA 541-A:32,I(b) and requests leave to intervene in the above captioned matter. In support of this motion, NHDES states as follows:

1. NHDES 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. Likewise, the natural gas provided by the gas utilities for thermal and other applications also results in emissions of air pollutants. Energy efficiency measures, which avoid having to generate electricity or burn natural gas, avoid emissions of all pollutants. Front-end pollution prevention strategies, such as energy efficiency and conservation, eliminate emissions of harmful pollutants to the air rather than just diminish them or shift their environmental impact to another media such as water or land.
3. NHDES has a direct interest in the issues raised by the utilities' filing in this docket, especially as they pertain to the design and delivery of energy efficiency programs and the potential interaction with the forward capacity market, as well as the use of funding for energy efficiency programs generated from the Regional Greenhouse Gas Initiative. NHDES has been an active participant in the stakeholder process leading to the creation of the EERS. NHDES's intervention will not impair the orderly conduct of the proceedings.

WHEREFORE, NHDES requests that the Commission grant this motion, allow NHDES 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

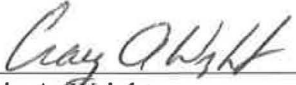
Air Resources Division

September 14, 2017

Certificate of Service

I certify that on this date a copy of the foregoing was sent via electronic mail or first-class United States mail to the Utilities and all other persons on the DE 15-137 Service List.

September 14, 2017



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