

**THE STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION**

Docket No. DE 17-136

ELECTRIC AND GAS UTILITIES

2018-2020 New Hampshire Statewide Energy Efficiency Plan

**PETITION TO INTERVENE
OF CONSERVATION LAW FOUNDATION**

Pursuant to the Commission's Order of Notice dated September 21, 2017, N.H. Admin. Rules, Puc 203.17 and Puc 203.2, and in accordance with the standards of RSA 541-A:32, Conservation Law Foundation ("CLF") hereby petitions for leave to intervene in the above-captioned docket. In support of its petition, CLF states as follows:

1. CLF is a private, non-profit organization with members in New Hampshire and across New England. CLF is dedicated to protecting New England's environment for the benefit of all people. CLF uses the law, science, and markets to create solutions that build healthy communities, sustain a vibrant economy, and preserve natural resources, including resources affected by the generation, transmission, and distribution of electric power and the transportation and use of natural gas. Consistent with its mission to promote thriving, resilient communities, CLF advancing sound clean energy policies that strengthen New England's—and New Hampshire's—economic vitality. CLF has approximately 4800 members, including 530 members residing in New Hampshire.

2. As set forth in the Order of Notice, in this docket the Commission will review the draft statewide 2018-2020 energy efficiency plan proposed by the New Hampshire utilities in a filing on September 1, 2017. The filing raises issues including, inter alia, whether the proposed programs are reasonable, cost effective, and in the public interest; whether the proposed

programs will properly utilize funds as required by RSA 125-O-23; and whether, pursuant to RSA 374:2, proposed performance incentives and lost base revenue calculations are just and reasonable.

3. CLF represents itself and the interests of its members in securing the many economic and environmental benefits associated with increased energy efficiency deployment. A robust and well-targeted energy efficiency program will help New Hampshire meet climate change and other environmental targets, lower the overall electricity bills that families and businesses must pay every month, constrain New Hampshire's otherwise-growing share of regional grid costs, keep more money and jobs within the Granite State, and improve the health and welfare of New Hampshire communities including low-to-moderate income residents.

4. Energy efficiency has been a major CLF priority since CLF spearheaded the publication in 1987 of "Power to Spare," which was the first comprehensive, regional effort to assess the economic and technical potential for increased energy efficiency and to set a policy and action agenda for public officials and utilities to achieve that potential.¹ "Power to Spare" laid the groundwork for the energy efficiency programs underway throughout New England.

5. CLF has engaged in a wide range of advocacy to advance the region's energy efficiency policies, including the energy efficiency programs overseen by the state public utility commissions. CLF's history of participation in Commission dockets here in New Hampshire regarding energy efficiency dates back to at least 1997 in DR 97-211. Most recently, CLF constructively participated in the docket that established the Energy Efficiency Resource Standard, Docket DE 15-137, and was a signatory to the settlement that was approved by the Commission on August 2, 2016 in Order No. 25,932. In the interval between Docket DE 15-137

¹ New England Energy Policy Council, Power to Spare: A Plan for Increasing New England's Competitiveness Through Energy Efficiency (1987), at [http://web.mit.edu/jjay/Public/EE/Power to Spare_1987_medium.pdf](http://web.mit.edu/jjay/Public/EE/Power_to_Spare_1987_medium.pdf)


and the filing of the plan at issue in this docket, CLF participated in workshops and other public programs related to the development of the 2018-2020 statewide energy efficiency plan. CLF attorney Melissa Birchard subsequently was elected to join the Energy Efficiency Resource Standard Committee of the Energy Efficiency and Sustainable Energy Board, where, together with other stakeholders, she developed initial recommendations for strengthening various components of the draft plan. Certain of those recommendations were adopted by the Energy Efficiency and Sustainable Energy Board and provided to the utilities.

6. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. This is the first program plan under the new Energy Efficiency Resource Standard. It will set the direction for state energy efficiency work for years to come. CLF has substantial expertise that will support the Commission's review of this plan. CLF has a long and constructive history of working closely with the utilities and other stakeholders on energy efficiency, including in DE 15-137 and on the EERS Committee, to improve energy efficiency programs in the state. In addition, intervention in this proceeding will allow CLF to represent the interests of CLF members who stand to benefit from the direct and indirect cost savings associated with energy efficiency investments, as well as those who will benefit from reduced emissions.

7. Allowing CLF to intervene will not impair the orderly and prompt conduct of the proceedings. CLF is open to innovative approaches to briefing, discovery, hearings, and settlement that will focus the proceeding in appropriate ways.

WHEREFORE, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,



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Dated: October 2, 2017

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition has on this 2nd day of October, 2017 been sent by email to the service list in Docket No. DE 17-136.



Melissa E. Birchard