

**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

**JOINDER OF CONSERVATION LAW FOUNDATION AND ACADIA CENTER
TO OCA'S SECOND MOTION TO COMPEL DATA RESPONSES**

Conservation Law Foundation (“CLF”) and Acadia Center hereby join in and support the Second Motion to Compel of the Office of the Consumer Advocate, filed in this docket on October 31, 2018. As stated in that motion, an abbreviated proceeding such as this one is premised on the need for prompt cooperation by the parties. It is particularly incumbent upon the utilities, who administer New Hampshire’s energy efficiency programs, to provide information within their sole control as monopoly regulated entities. A lack of prompt cooperation by the utilities affects not only the Consumer Advocate, but all parties whose ability to fully participate in this proceeding relies on the timely disclosure of relevant information. Ultimately, it disadvantages the state and harms the public. We therefore file this joinder.

The Consumer Advocate has supported the relevance of the data sought. Without repeating the Motion to Compel, targeted energy efficiency is squarely within the scope of concern. The settlement agreement both contemplates and provides for the consideration of various programmatic matters in annual updates within the overall three-year program period, particularly in this early launch period of the EERS. Moreover, it is our understanding that the requested information exists and should be readily available, as a result of prior directives issued by this Commission in Docket No. DE 16-576, to which CLF and Acadia Center are also parties.

WHEREFORE, CLF and Acadia Center join the October 31, 2018 Motion to Compel and respectfully request that the Commission grant the relief sought by the Office of the Consumer Advocate in that motion.

Respectfully submitted,



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Dated: November 5, 2018

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has on this 5th day of November, 2018 been sent by email to the service list in Docket No. DE 17-136.

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

Melissa E. Birchard