

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

**Docket No. DG 17-152**

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.,  
d/b/a LIBERTY UTILITIES**

**2017 Least Cost Integrated Resource Plan**

**CONSERVATION LAW FOUNDATION  
PETITION TO INTERVENE**

The Public Utilities Commission (“Commission”) has initiated a proceeding to consider Liberty Utilities’ petition for approval of its 2017 Least Cost Integrated Resource Plan (“LCIRP”). In its February 8, 2018 Order of Notice, the Commission directed interested parties to seek intervention by March 7, 2018. Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the Order of Notice, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32.

CLF states as follows in support of its petition to intervene:

1. CLF is a private, non-profit organization 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 advances sound clean energy policies that strengthen New England’s—and New Hampshire’s—economic vitality. CLF has approximately

5,000 members in New England, including over 530 members in New Hampshire, some of whom reside in the natural gas distribution service territory of Liberty Utilities.

2. As set forth in the Order of Notice, the instant LCIRP filing raises issues related to whether Liberty's planning process is adequate as defined by the requirements of RSA 378:38 and RSA 378:39, as recently amended by the New Hampshire legislature; and whether the filing adequately addresses the Commission's requirements set forth in Order No. 25,762. In deciding whether or not to approve Liberty's LCIRP, the Commission "shall consider potential environmental, economic, and health-related impacts." RSA 378:39. In doing so, the Commission is encouraged to consult with stakeholders and subject matter experts. *See id.*

3. CLF has significant subject matter expertise in subjects at issue in this proceeding. CLF has extensive expertise concerning the environmental, economic, and health-related impacts of natural gas, natural gas storage, and non-gas alternatives, as well as energy projects and markets. As a participant in the NEPOOL stakeholder process, CLF has participated in the formation and refinement of New England's energy markets and planning of the region's electric transmission grid. An active voting member of NEPOOL, CLF has represented its end-user sector in the ISO-NE Natural Gas Electric Coordination working group. CLF's expertise extends to natural gas and electricity coordination, natural gas energy efficiency and conservation, natural gas supplies, natural gas distribution infrastructure, greenhouse gas emission reduction requirements, electrification, grid modernization, and the economic, health, and environmental impacts of natural gas pipelines.

4. CLF's substantial involvement in New Hampshire natural gas, energy efficiency, and other energy matters has spanned two decades. This involvement includes intervention in numerous dockets before the Public Utilities Commission, such as Docket Nos.: 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 10-261, DE 11-215, DE 11-250, DE 13-108, DE 13-275, DE 14-120, DE 14-238, DE 15-124, IR 15-124, IR 15-137, IR 15-296, DE 16-241, DE 16-693, DE 16-817, DE 17-124, DE 17-136, and DE 17-189. CLF has also participated in natural gas-related proceedings before numerous other state agencies in the region and the Federal Energy Regulatory Commission.

5. CLF and its members have a strong interest in ensuring sound planning and investments by New Hampshire's natural gas utilities, including Liberty. Natural gas is a major contributor to climate change, which impacts CLF's members across the state and the region. The health, welfare, and economic well-being of CLF's members, including members within Liberty's natural gas service territory who are Liberty gas customers, will be affected by the outcome of this proceeding. Because the rights, privileges, and interests of CLF and its members will be affected by the outcome of this proceeding, intervention is merited.

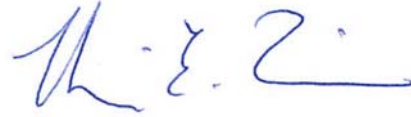
6. CLF furthermore respectfully submits that its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding, as a result of CLF's special expertise and experience, and is consistent with the inclusive language and intent of RSA 378:39.

7. CLF's participation is in the interests of justice and the orderly and prompt conduct of the proceeding. CLF's participation will neither delay nor disrupt this proceeding. The interests of CLF and its members are not adequately represented by any other party.

**WHEREFORE**, Conservation Law Foundation respectfully requests that the Commission grant its petition to intervene in Docket No. DG 17-152.

Respectfully submitted,

CONSERVATION LAW FOUNDATION




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Dated: March 6, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Petition to Intervene has, on this 6<sup>th</sup> day of March, 2018, been sent by email to the service list in Docket No. DG 17-152.



Melissa E. Birchard  
Conservation Law Foundation