

Petition for Intervention

January 2, 2018

State of New Hampshire Public Utilities Commission

DE 17-189

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities Petition to Approve Battery Storage Pilot Program

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 sustainable energy in New Hampshire. We have hundreds of residential and business members across the state of NH, many of whom are customers in the Liberty Service territory with a specific interest in this pilot program, as well as members who are engaged—commercially or otherwise—in the growing battery storage market in the state of New Hampshire. Our mission is to strengthen New Hampshire’s economy and conserve natural resources by promoting a transition to clean, efficient, and renewable energy.
2. NHSEA has an interest in pursuing greater deployment of battery storage and distributed energy resources across the state. NHSEA has participated in many proceedings before the Commission in the past on behalf of clean energy practices and regulation in New Hampshire, including in DE 16-576, DE 15-137, IR 15-296, and DE 17-136. Many NHSEA members have an active interest in the development and deployment of battery storage, as well as how that development progresses among and between consumers, businesses, and utilities.
3. 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.

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

Respectfully Submitted,



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 the Utilities and all other parties on the Service List in DE 17-189.

A handwritten signature in black ink, appearing to read 'Kate Epsen', with a long horizontal flourish extending to the right.

Kate Epsen

Executive Director

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