

THE STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DE 17-189
LIBERTY UTILITIES
Petition to Approve Battery Storage Pilot

PETITION TO INTERVENE
OF ACADIA CENTER

Pursuant to the Commission's Order of Notice dated December 13, 2017 ("Order of Notice"), N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32, Acadia Center hereby submits this petition to intervene in the above-captioned docket ("Petition").

In support of its petition, Acadia Center states the following:

1. Acadia Center is a non-profit, research and advocacy organization committed to advancing the clean energy future in the Northeast. Acadia Center is at the forefront of efforts to build clean, low carbon and consumer friendly economies. Acadia Center's approach is characterized by reliable information, comprehensive advocacy and problem solving through innovation and collaboration.
2. Acadia Center has been active in New Hampshire and other northeastern states in researching and promoting consumer-friendly rate design that preserves incentives to use energy wisely, gives consumers greater control over energy bills, and modernizes tariffs to account for economic costs and benefits. Acadia Center experts have researched and written about utility rate design in a distributed energy future, including "UtilityVision," "Utility Rate Design Principles for Advancing a Consumer-Friendly Energy System,"² and the "Next Generation Solar Framework"³.
3. Acadia Center participated in the process undertaken by the Massachusetts Department of Energy Resources (DOER) in support of its consideration to adopt targets for a binding energy storage utility procurement mandate under the Energy Diversity Act.
4. Acadia Center has considerable experience and expertise in matters relating to New Hampshire energy and electric utility policy. At the Public Utility Commission, Acadia Center has participated in the docket related to an Energy Efficiency Resource Standard, DE 17-136, the docket establishing

¹ See: <http://acadiacenter.org/utilityvision/>

² See: <http://acadiacenter.org/document/utility-rate-design-principles/>

³ See: <http://acadiacenter.org/document/nextgensolarframework/>

new net metering tariffs (DE 16-576) and was a member of the Grid Modernization Working Group established in IR 15-296.

5. To build consumer-friendly clean energy systems, Acadia Center spends considerable time, effort, and monetary resources working to ensure that utility rate design preserves incentives to use energy wisely and fairly incentivizes clean distributed generation in New Hampshire, Rhode Island, Massachusetts, Maine, Connecticut, and New York.

8. Collectively, Acadia Center's staff has a combined several decades of experience on the impact of utility rate design on consumer adoption of energy efficiency and clean energy technologies, and the ability of consumers to control their energy bills. As such, Acadia Center's participation in this proceeding is in the interests of justice.

9. Accordingly, Acadia Center's rights, duties, privileges, immunities or other substantial interests may be affected by this proceeding. Allowing Acadia Center to intervene will not impair the orderly and prompt conduct of the proceedings as demonstrated by substantial contributions and participation in other dockets.

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

Respectfully submitted,



Ellen Hawes
Senior Analyst, Energy Systems and Carbon Markets
Acadia Center
ehawes@acadiacenter.org
Phone: (802)649-1140
Cell: (207) 233-4182
www.acadiacenter.org

Dated: January 2, 2018

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing petition has on this 2nd day of January, 2018 been sent by email to the service list in Docket No. DE 17-189.

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Ellen Hawes  
Senior Analyst, Energy Systems and Carbon Markets  
Acadia Center