

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

Docket No. IR 22-042

Electric and Gas Utilities

Investigation of Energy Efficiency Planning, Programming, and Evaluation

**CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding in accordance with the New Hampshire Public Utilities Commission’s Order of Notice establishing this docket. Because this is an investigatory docket, CLF respectfully believes that the formal filing of an intervention petition is unnecessary and unwarranted pursuant to the statutes, procedural rules, and Commission’s past practices governing such dockets. Nevertheless, in support of its petition to intervene, CLF avers as follows:

1. CLF is a 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 5,700 members in New England, including over 760 members in New Hampshire.

2. In this docket, the Commission will examine the Joint Utilities development of the 2024-2026 Statewide New Hampshire Energy Efficiency Plan and to explore, *inter alia*, the

following issues relating to energy efficiency in New Hampshire: (1) the Granite State Test, Total Resource Cost Test, and discount rates; (2) performance incentives; (3) impacts on New Hampshire's economy; (4) subsidized services and equipment; (5) market barriers; (6) reporting on spending by category; (7) reporting on low-income program offerings; and (8) reporting made to other regional or regulatory organizations.

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. "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 regarding energy efficiency dates to at least 1997 in DR 97-211. More recently, CLF constructively participated in the docket that established the Energy Efficiency Resource Standard (EERS), 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. CLF also participated in workshops and other public programs related to the development of the 2018-2020 statewide energy efficiency plan. In particular, CLF was a member of the EERS Committee of the Energy Efficiency and Sustainable Energy (EESE) Board, where, together with other stakeholders, it developed initial recommendations for strengthening various components of the draft 2018-2020 statewide energy efficiency plan. Certain of those recommendations were adopted by the EESE Board and provided to the utilities. Moreover, CLF participated in the docket for the 2018-2020 statewide energy efficiency plan, Docket DE 17-136, and was a signatory to the settlement agreement for the 2018-2020 plan, which was approved by the Commission on January 2, 2018, in Order No. 26,095.

6. Additionally, CLF, as a member of the EERS Committee, participated in workshops and other public programs related to the development of the 2021-2023 statewide energy efficiency plan. Together with other stakeholders on the EERS Committee, CLF made recommendations for strengthening various components of the 2021-2023 statewide energy efficiency. CLF was granted intervenor status and participated in the adjudicatory docket that considered the 2021-2023 statewide energy efficiency plan, Docket DE 20-092.

7. CLF has also participated in public stakeholder workshops and meetings of the EERS Committee (now refashioned as the EE Committee) as the committee begins considering the development of the 2024-2026 statewide energy efficiency plan.

8. CLF has also intervened in numerous other dockets before the Commission over the past two decades, including the following Docket Nos.: 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; IR 15-124; IR 15-296; DE 16-241; DE 16-576; DE 16-693;

DE 16-817; DE 17-124; DG 17-152; DE 17-189; DG 17-198; DE 19-033; DE 19-104; IR 20-004; IR 20-166; DE 20-170; DG 21-008; DE 21-030; DG 21-036; and DE 21-078.

9. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. The 2024-2026 statewide energy efficiency plan 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, DE 17-136, DE 20-092, 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.

10. Allowing CLF to intervene will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, although CLF believes that formal intervention is unnecessary given the investigatory nature of this docket, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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