

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

Docket No. DG 23-041

**NORTHERN UTILITIES, INC.
2023 Least Cost Integrated Resource Plan**

**CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding pursuant to the New Hampshire Public Utilities Commission’s (“Commission”) Order of Notice establishing this docket and in accordance with N.H. Admin. Rules, Puc 203.17, and RSA 541-A:32. In this docket, Northern Utilities, Inc. (“Northern”) seeks approval of its least cost integrated resource plan (“LCIRP”) for the five-year period beginning in 2023 (“2023 LCIRP”), filed with the Commission on March 31, 2023. 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 5,450 members in New England, including over 740 members in New Hampshire.

2. In this docket, the Commission will consider Northern's 2023 LCIRP. CLF's participation in Docket No. DG 23-041 will uniquely aid in the consideration of the 2023 LCIRP. CLF has extensive expertise concerning 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 previously represented its end-user sector in the ISO-NE Natural Gas Electric Coordination working group. CLF's expertise in the energy arena extends to, *inter alia*, 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 and environmental impacts of natural gas pipelines.

3. More recently, CLF intervened and participated in several natural gas-related proceedings, including Commission Docket Nos. DG 17-152, DG 17-198, DG 20-008, DG 21-036, and DG 22-064. DG 17-152 and DG 22-064 concern Liberty's LCIRPs for the years 2017/2018 through 2021/2022 and the years 2022/23 through 2026/27, respectively. DG 17-198 involved Liberty's now-abandoned Granite Bridge project. DG 21-008 and DG 21-036 involved Liberty's petitions for approval of a natural gas supply and transportation agreement and a renewable natural gas supply and transportation agreement, respectively.

4. 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; DE 17-189; DE 19-033; DE 19-104; IR 20-004; IR 20-166; DE 20-170; DE 21-030; DE 21-078; IR 22-042; and IR 22-053.

5. CLF and its members, including members who are Northern gas customers, have a direct and substantial interest in ensuring that adequate consideration is given to potential alternatives for Northern's 2023 LCIRP, including non-gas alternatives such as energy efficiency, that may entail lower costs and fewer environmental impacts. CLF and its members have an interest in ensuring that non-gas alternatives are given adequate consideration in part because natural gas is a major contributor to climate change and impacts the health and welfare of CLF's members and their children, as well as the resilience of the local economy. Similarly, CLF and its members have a substantial interest in ensuring that Northern conducts an adequate analysis into the environmental and public health impacts of its preferred resource alternative, as required by the LCIRP statutes, RSA 378:37-40. As New Hampshire, and New England more broadly, transitions away from excessive reliance on fossil fuels, fossil fuel expansion projects by regulated entities that may result in increased greenhouse gas emissions and/or stranded costs should be subject to appropriate review.

6. The rights, privileges, and interests of CLF and its members, particularly those who are Northern gas customers and will consequently shoulder the costs of Northern's preferred resource alternatives, will be substantially affected by the outcome of this proceeding. CLF and its members will also be substantially and directly affected by the environmental and public health impacts resulting from Northern's preferred resource alternatives.

7. CLF 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.

8. 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, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

By: /s/Nick Krakoff
Nick Krakoff, Staff Attorney
27 North Main Street
Concord, NH 03301
(603) 225-3060 x 3015
nkrakoff@clf.org

May 5, 2023