

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

Docket No. DE 23-063

**Public Service Company of New Hampshire d/b/a Eversource Energy, Liberty Utilities
(Granite State Electric) Corp. d/b/a Liberty, and Unitil Energy Systems, Inc.**

**Petition for Waiver of Certain Provisions of the Puc 2200 Rules and Request to Recover
Costs of Implementing the Puc 2200 Rules**

**CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding in accordance with N.H. Admin. Rules, Puc 203.17 and with the standards of RSA 541-A:32. 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 5,430 members in New England, including over 740 members in New Hampshire.
2. In this docket, the Public Utilities Commission (“Commission”) will consider whether Public Service Company of New Hampshire d/b/a Eversource Energy, Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, and Unitil Energy Systems, Inc. (collectively, “Joint

Utilities”) are entitled to a temporary or permanent waiver of Puc 2205.16(d)(1) under Puc 2201.03(b) and Puc 201.05; whether CPAs electing bill-ready billing must comply with Puc 1203.06(b); whether the term “usage data” in the Puc 2200 rules includes net metered customer export data; if providing such data is required, whether Eversource is entitled to a temporary waiver of Puc 2204.02(a)(2) and Puc 2205.13(a)(7); and whether the Joint Utilities are authorized to recover prudently incurred, incremental costs of implementing the Puc 2200 rules through an annual reconciling rate mechanism or a regulatory asset

3. CLF’s expertise in the energy arena extends to residential, community, and utility-scale renewable energy, as well as distributed generation, including solar photovoltaic, hydroelectric, wind, and combined heat and power projects. CLF also has expertise in energy efficiency, grid modernization including the integration of renewables, and non-transmission alternatives. Through active participation in regulatory proceedings on subjects such as energy efficiency, demand response, and compensation for distributed energy resources, CLF has developed expertise in the area of cost benefit analysis. CLF also has significant experience in the areas of electric reliability and rate development.

4. CLF’s involvement in New Hampshire energy matters has spanned the past two decades and includes intervention in numerous proceedings before the Commission, 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; DE 21-030; DG 21-036; DE 21-078; IR 22-042; IR 22-053; DE 22-060; DE 23-039; and DE 23-068.

5. With respect to community power aggregation, the subject of the instant docket, CLF joined the rulemaking petition in Docket No. DRM 21-142, led by the Community Power Coalition of New Hampshire, requesting that the Commission adopt and implement rules on municipal and county power aggregation. Thereafter, CLF participated in stakeholder discussions regarding the proposed rules. The Commission later approved final rules on municipal and county power aggregation. The Joint Utilities now seek a waiver from several of these rules.

6. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. CLF's members who reside in municipalities and counties that have adopted community power programs benefit from lower electric rates, additional clean energy options, and increased local control over energy programs. Intervention in this proceeding will allow CLF to represent the interests of CLF members who will benefit from the direct and indirect cost savings associated with community power aggregation, as well as those who stand to benefit from the reduced emissions that result from greater clean energy and demand response options.

7. As a result of CLF's special expertise and experience, 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. CLF's participation will neither delay nor disrupt this proceeding. Further, 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

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August 3, 2023