

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

Docket No. DE 24-070

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
Request for Change in Distribution Rates**

**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”) June 28, 2024 Order of Notice commencing this docket, and in accordance with N.H. Admin. Rules, Puc 203.17, and RSA 541-A:32. In this docket, Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) petitions for the Commission to fix and determine permanent and temporary rates and approval of a four-year performance-based ratemaking (“PBR”) plan. 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. 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 Commission will consider Eversource's request for permanent and temporary increases in rates, as well as a number of other Eversource proposals, including a PBR plan. CLF's participation in Docket No. DE 24-070 will uniquely aid in the Commission's consideration of Eversource's proposals. CLF has extensive expertise in several of the subjects at issue in this proceeding. Regarding PBR, CLF participated in the Commission's grid modernization investigation proceeding, Docket No. IR 15-296, which considered PBR, as well as Docket No. DE 23-039, Granite State Electric's ongoing rate case in which it proposes a PBR plan. CLF also has experience with general rate cases having participated in both Docket No. DE 23-039 and Unitil's most recent rate case, Docket No. DE 21-030.

3. 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; 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; DE 20-170; DG 21-036; DE 21-078; IR 22-042; IR 22-053; DE 22-060; DG 22-064; IR 22-076; DE 23-063; and DE 23-068.

4. CLF and its New Hampshire members have a direct and substantial interest in the outcome of this proceeding. Eversource's rate increase and PBR proposals will change its customers' electric rates and, thus, substantially affect CLF's members that are Eversource's customers.

5. 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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