

**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
AMENDED PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby files this amended petition 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:32.¹ 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—

¹ CLF filed an initial petition to intervene on July 12, 2024.

economic vitality. CLF has approximately 5,160 members in New England, including over 670 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 has a direct and substantial interest in the substance and outcome of this proceeding. CLF and its members are concerned about climate change and the pollution caused by fossil fuel energy resources and part of the organization's mission is to advocate for the proliferation of affordable, low-carbon energy resources with minimal terrestrial impacts, including distributed energy resources ("DER"). CLF has members who either own DER—

including rooftop solar installations—or hope to install DER in the future. Generally, Eversource’s PBR proposal has the potential to advance these policy objectives, and so CLF’s and its members’ duties, obligations, rights and privileges could be implicated by the outcome of this proceeding. Eversource’s PBR proposal includes a distributed generation interconnection reporting metric that will address customer satisfaction with DER interconnection to facilitate clean energy interconnection.² CLF and its members have a direct interest in avoiding reliance on polluting fossil fuel energy resources through installing DER in Eversource’s service territory in as expedited a timeline as possible, and therefore CLF has a direct and substantial interest in Eversource’s interconnection efforts. Demand response also fosters CLF’s mission, so CLF and its members have an invested interest in the demand response reporting metric in the PBR proposal.

5. CLF respectfully submits that its intervention as a party in this proceeding will allow it to offer critical input that is likely to elucidate issues important to the organization and will facilitate an expeditious and just resolution of this proceeding. CLF’s participation will neither delay nor disrupt this proceeding. Further, as none of the other parties to this docket have the same objectives as CLF, 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.

² See Testimony of PBR Metrics Panel, Eversource, at 22 (NH PUC Docket No. DE 24-070, Jun. 11, 2024).

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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