

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

Case No. DE 07-064

In re: Investigation into Energy Efficiency Rate Mechanisms

ENTRY OF APPEARANCE  
AND  
MOTION TO INTERVENE

I. ENTRY OF APPEARANCE

New Hampshire Sierra Club, 40 N Main Street, Concord, NH 03301, by its attorney, Arthur B. Cunningham, 79 Checkerberry Lane, PO Box 511 Hopkinton, 03229, hereby enters its appearance herein.

II. MOTION TO INTERVENE

New Hampshire Sierra Club respectfully moves the Public Utilities Commission for permission to intervene in the captioned matter. The purpose of the New Hampshire Sierra Club for this Motion to Intervene is to urge that:

- a. The Public Utilities Commission fix specific electric consumption reduction goals by date certain, but not later than January 1, 2009.
- b. The Public Utilities Commission develop and publish findings and standards for progressive pricing, energy efficiency, load management, demand response, distributed generation and other electric consumption reduction strategies on or before July 1, 2009.
- c. Utilities submit to the Public Utilities Commission a plan to meet the standards issued by the Public Utilities Commission as required by paragraph b. above on or before July 1, 2010. The plans must include measurable goals and target percentages that demonstrate compliance with the standards as promulgated by the Public Utilities Commission pursuant to paragraph b. above.

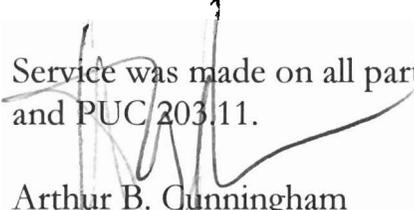
NHPUC FEB06'08 AM11:29

- d. The Public Utilities Commission consistent with the schedule outlined in paragraphs b. and c. above, complete the investigation into electrical efficiency rate mechanisms in order to accomplish the electric consumption reduction goal described in paragraph a. above. The decoupling rate making process must be revenue neutral and must remove the disincentives for the utilities to invest in energy efficiency in accordance with the findings and standards published by the Public Utilities Commission pursuant to paragraph b. above.

  
Respectfully submitted,

Arthur B. Cunningham  
Attorney for New Hampshire Sierra Club  
79 Checkerberry Lane  
PO Box 511  
Hopkinton, NH 03229  
603-746-2196  
[Cunninghamarthur1@gmail.com](mailto:Cunninghamarthur1@gmail.com)  
NH Reg.#18301

#### CERTIFICATE OF SERVICE

  
Service was made on all parties this 6<sup>th</sup> day of February 2008 pursuant to PUC 203.02 and PUC 203.11.

Arthur B. Cunningham

Attorney for New Hampshire Sierra Club