

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

Docket No. DE 14-216

CORE NH Electric and Gas Energy Efficiency Programs

CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding, pursuant to Order No. 25,948 (September 30, 2016), N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32. According to the Commission’s September 30, 2016 order, in this docket the Commission will determine whether the proposed 2017 Core energy efficiency programs are reasonable, cost effective, and in the public interest; whether the proposed programs will properly utilize funds from the Energy Efficiency Fund as required by RSA 125-O:23; and whether, pursuant to RSA 374:2, the Electric Utilities’ and Gas Utilities’ proposed calculations of performance incentives and lost base revenue are just and reasonable and comply with Commission orders. The Commission directed interested parties to seek intervention by October 18, 2016. CLF was an active participant in the recent Energy Efficiency Resource Standard proceeding, Docket No. DE15-137, and now seeks to participate in this Core energy efficiency docket.

In support of its petition for intervention, CLF states as follows:

1. CLF is a private, non-profit environmental membership organization dedicated to the protection and responsible use of New England’s natural resources, including resources

affected by the generation, transmission, and distribution of electric power. CLF has members throughout the region, including New Hampshire residents who will be directly affected by the outcome of this proceeding.

2. Consistent with its mission to promote thriving, resilient communities, CLF is dedicated to advancing solutions that strengthen New England's – and New Hampshire's – environmental and economic vitality. CLF has extensive expertise concerning 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.

3. CLF's expertise in the energy arena also extends to 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, including energy efficiency, has spanned the past two decades and includes intervention and participation in numerous dockets before the Public Utilities Commission, such as Docket Nos.: DR 97-211, DE 01-057, DE 07-064, DE 08-103, DE 08-145, DE 09-033, DE 10-160; DE 10-188; DE 11-215; DE 11-250; DE 13-108; and DE 13-275, DE 14-120, DE 14-238, DE 15-124, IR 15-072; IR 15-124, IR 15-137; IR 15-296; DE 16-241; and DE16-576.

5. CLF has long supported energy efficiency throughout the region and in New Hampshire. In 1987, CLF spearheaded the publication of "Power to Spare," which was the first

comprehensive, regional effort to assess the economic and technical potential for increased energy efficiency and to set a policy and action agenda for public officials and utilities to achieve that potential. “Power to Spare” laid the groundwork for the energy efficiency programs underway throughout New England, which have played an important role in halting the growth of overall electric demand and reducing consumer bills. Most recently, CLF was an active participant in Docket No. DE 15-137. In that docket, CLF filed joint testimony in support of a robust Energy Efficiency Resource Standard, and was a signatory to the uncontested settlement reached by the parties and approved by this Commission on August 2, 2016.

6. CLF has members who reside in New Hampshire in the service territories of Unitil Energy Systems, Eversource Energy, and Liberty Utilities. CLF and its members have a substantial interest in ensuring strong, cost-effective, and verifiable energy efficiency programs in New Hampshire and will be directly affected by the outcome of this proceeding. The rights, privileges, and interests of CLF and its members will be affected by the outcome of this proceeding.

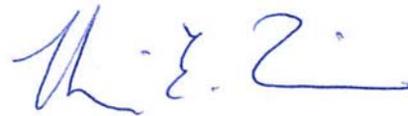
7. CLF respectfully submits that its recent participation in Docket No. DE 15-137 was constructive and valuable. Similarly, its participation in this proceeding will contribute to an efficient and full airing of the issues. The 2017 Core programs constitute a transition year ahead of the launch of the recently approved Energy Efficiency Resource Standard, and will serve as an important bridge for improved energy efficiency programming in the state. CLF seeks to help make this transition year a success.

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.

WHEREFORE, Conservation Law Foundation respectfully requests that the Commission grant its petition to intervene in Docket No. DE 14-216.

Respectfully submitted,

CONSERVATION LAW FOUNDATION



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Dated: October 18, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene has on this 18th day of October 2016 been sent by email to the service list in Docket No. DE 14-216.



Melissa E. Birchard
Conservation Law Foundation