

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

Docket No. DE 16-576

Development of New Alternative Net Metering Tariffs
and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators

CONSERVATION LAW FOUNDATION
PETITION TO INTERVENE

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the May 19, 2016 Order of Notice, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32. In accordance with recently amended paragraph XVI of RSA 362-A:9, the Public Utilities Commission (“Commission”) has initiated a proceeding to consider new alternative net metering tariffs, which may include other regulatory mechanisms and tariffs for customer-generators, and to determine whether and to what extent such tariffs should be limited in their availability within each electric distribution utility’s service territory. In its Order of Notice, the Commission directed interested parties to seek intervention by June 7, 2016.

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 extends to residential, community, and utility-scale renewable energy including distributed generation such as 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 dockets before the state's 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 15-124, IR 15-137; IR 15-296; and DE 16-241.

5. CLF has long supported the increased penetration of distributed generation for purposes including reducing greenhouse gas emissions, empowering consumers of electric power, reducing the need for costly and intrusive large infrastructure, and diversifying energy resources. CLF has participated in net metering and related legislative and regulatory

proceedings in states throughout the region, including Massachusetts, Vermont, Rhode Island, and Maine. In Vermont, for example, CLF participated in legislative hearings regarding the development and later modifications of Vermont's net metering program, including providing testimony to Vermont's legislative committees. In the development of net metering rules in Vermont, CLF participated in the rule making proceeding, including providing comments on various technical and policy aspects of effective implementation of net metering. In New Hampshire, CLF was an active participant and provided testimony in the legislative process that led to House Bill 1116, relative to this net metering docket. CLF is also a participant in the Grid Modernization Working Group, pursuant to Docket No. IR 15-296, which addresses certain related issues including the enhanced integration of distributed generation into the electric power grid.

6. CLF has members who reside in New Hampshire in the service territories of Unitil Energy Systems, Eversource Energy, and Liberty Utilities, including members who reside in service territories subject to this docket who own distributed generation, including rooftop solar installations, and members who hope in the future to install such distributed generation. CLF and its members are concerned about and directly affected by the need for reliable, affordable, and low-carbon energy resources with minimal terrestrial impacts, as well as the adverse impacts of climate change. CLF and its members have a substantial interest in ensuring reasonable compensation mechanisms for distributed energy resources 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 intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this

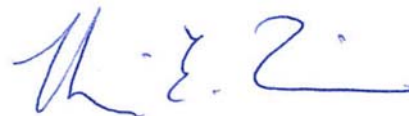
proceeding, as a result of CLF's special expertise and experience. In particular, CLF intends to provide expertise on the appropriate costs and benefits that should be objectively evaluated relative to distributed generation. Distributed generation can provide valuable benefits to the grid, and to communities, including reduced carbon emissions, increased resiliency, and consumer empowerment.

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 16-576.

Respectfully submitted,

CONSERVATION LAW FOUNDATION



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Dated: June 6, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene has on this 6th day of June 2016 been sent by email to the service list in Docket No. DE 16-576.



Melissa E. Birchard
Conservation Law Foundation