

**BEFORE THE NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

DE 16-576

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

**NEW HAMPSHIRE SUSTAINABLE ENERGY ASSOCIATION'S
PETITION TO INTERVENE**

NOW COMES the New Hampshire Sustainable Energy Association (“NHSEA”), by its attorneys, Primmer Piper Eggleston and Cramer PC, hereby petitions, pursuant to RSA 541-A:32 and Rule Puc 203.17, that the Public Utilities Commission (the “Commission”) grant it intervention in the above-captioned docket. In support of its Petition, the NHSEA states as follows:

A. BACKGROUND.

On May 19, 2016, the Commission issued an Order of Notice (the “Order”) opening this docket. The purpose of the docket is to respond to the requirement in New Hampshire House Bill 1116 to “develop 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 that Order, the Commission set an intervention deadline of on or before June 7, 2016.

B. LEGAL STANDARD.

RSA 541-A:32(I) states that the Commission shall grant intervention if the petitioner demonstrates that its “rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding” and “that the interests of justice and the orderly and prompt conduct

of the proceedings would not be impaired by allowing the intervention.” Additionally, the Commission may grant permissive intervention if “such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings.” RSA 541-A:32(II).

C. ARGUMENT.

The New Hampshire Sustainable Energy Association (NHSEA) is a statewide nonprofit organization that educates and advocates for clean energy in New Hampshire. It has residential and business members across the state of New Hampshire, including customer-generators and developers of net metering facilities, both in the present and for the future. Its mission is to strengthen New Hampshire’s economy and conserve natural resources by promoting a transition to clean, efficient, and renewable energy.

NHSEA has a strong interest in enabling citizens, towns and businesses to use on-site renewable energy; net energy metering is an important policy tool to enable the deployment of such projects. NHSEA has participated in many proceedings before the PUC in the past on behalf of its members, clean energy practices and regulation in NH, and specifically on NH’s net metering Puc 900 rules and related net metering practices and policies.

As this proceeding has as its express purpose the creation of a new “regulatory mechanism” for customer-generators and net metering, NHSEA’s members have rights, duties, privileges and immunities that will be directly affected by this proceeding. Moreover, NHSEA has a demonstrated substantial interest that will be affected by the proceeding. The interests of justice would be enhanced by NHSEA’s participation in the docket because of its broad representation of the renewable energy sector and its deep knowledge of the issues presented. Finally, NHSEA’s intervention would not impair the orderly and prompt conduct of the

proceeding. NHSEA respects the importance of carrying out an orderly and timely proceeding that will not unduly delay the Commission in reaching its decision in this matter.

WHEREFORE, NHSEA respectfully requests that the Commission grant it full intervenor status in this matter.

Respectfully submitted,

THE NEW HAMPSHIRE SUSTAINABLE ENERGY
ASSOCIATION

By its attorneys,



Dated: June 7, 2016

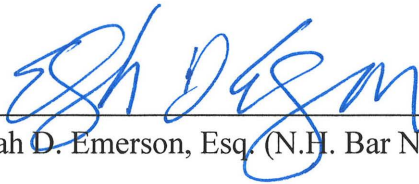
By:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PETITON TO INTERVENE has this day been forwarded via e-mail or mail to persons named on the Distribution List of this docket.

Dated: June 7, 2016



Elijah D. Emerson, Esq. (N.H. Bar No. 19358)