

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

**DE 16-576**

**ELECTRIC DISTRIBUTION UTILITIES**

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

**PETITION TO INTERVENE OF THE ALLIANCE FOR SOLAR CHOICE**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.17 and Revised Statutes section 541-A:32, The Alliance for Solar Choice (TASC), by and through its undersigned counsel, respectfully submits this Petition to Intervene (Petition) in the above-referenced proceeding.

**1. Introduction**

TASC was founded by the largest rooftop solar companies in the nation and is a leader in solar advocacy and protecting consumer energy choice. TASC maintains a diverse membership of national and local installers, including Geostellar, Inc., LGCY Power, REPOWER by Solar Universe, SunTime Energy, Sunrun, Lightwave Solar, Palmetto Solar and Demeter Power. The rooftop solar market in New Hampshire has been driven by New Hampshire residents' desire to assert control over their electric bills, and TASC strongly supports the continuation of this consumer option. TASC's members are committed to ensuring the state's citizens have a viable choice in energy providers that offer near-term, low-cost, and customer-based solutions to integrate renewable energy resources and improve operational efficiencies. These solutions will help preserve both the health of the solar industry and the public interest at large.

Under RSA 541-A:32, a petition to intervene shall be granted if the petitioner demonstrates that they have "rights, duties, privileges, immunities or other substantial interests" that may be affected by the proceeding, and "the interests of justice and the orderly and prompt conduct of the

proceedings would not be impaired by allowing the intervention.” As discussed further below, TASC has a substantial interest in this proceeding and its intervention will not impair the interests of justice and orderly and prompt conduct. TASC therefore respectfully requests that the New Hampshire Public Utilities Commission (Commission) grant this Petition.

**2. TASC’s rights, duties, privileges or other substantial interests will be affected by this proceeding**

TASC has a direct and substantial interest in this proceeding because we work to develop local employment opportunities through solar energy and to help homeowners have a choice in how they get their energy. This proceeding arises from New Hampshire House Bill 1116 (HB 1116), which amended several provisions of RSA 362-A:9, the net metering section of the Limited Electrical Energy Producers Act, RSA 362-A. The new language requires the Commission to consider the costs and benefits of net metered solar in order to determine whether new net metering tariffs are necessary.

The tariffs at issue in this proceeding are fundamental to the businesses of TASC’s membership. TASC has direct involvement in the state’s solar industry, solar workforce, and clean energy future and as such, this proceeding is directly relevant to us.

**3. The interests of justice and orderly and prompt conduct will not be impaired by allowing TASC to intervene in this proceeding**

TASC’s intervention will not impair the interests of justice or the orderly and prompt functioning of this proceeding. TASC’s participation in this proceeding will be limited to the scope of issues and timelines the Commission establishes, thereby ensuring the orderly and prompt conduct of this proceeding.

**4. Conclusion**

For the foregoing reasons, TASC respectfully requests the Commission grant this Petition.

Respectfully submitted,

/s/ Thadeus B. Culley

Thadeus B. Culley  
NC Bar # 47001  
CA Bar # 271602  
Keyes, Fox & Wiedman LLP  
100 Harrison Oaks Blvd., Suite 100  
Cary, NC 27513  
Telephone: (510) 314-8205  
Email: [tculley@kfwlaw.com](mailto:tculley@kfwlaw.com)

Counsel for The Alliance for Solar Choice

June 6, 2016.

**Certificate of Service**

**RE: Docket # DE 16-576, Development of New Alternative Net Metering Tariffs and/or Other Regulatory Mechanisms and Tariffs for Customer-Generators**

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record in this proceeding in accordance with the requirements of N.H. Admin. Rule Puc 203.11, in the manner and upon the persons listed below:

Dated this 6<sup>h</sup> of June 2016.



---

Blake Elder  
Keyes, Fox & Wiedman LLP  
401 Harrison Oaks Blvd, Suite 100  
Cary, NC 27513  
(919) 825-3339  
[belder@kfwlaw.com](mailto:belder@kfwlaw.com)

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

---

---

**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

Executive.Director@puc.nh.gov	
allen.desbiens@nu.com	eric.stanley@libertyutilities.com
amanda.noonan@puc.nh.gov	f.anne.ross@puc.nh.gov
barbara.bernstein@puc.nh.gov	frank.melanson@nu.com
bob.reals@libertyutilities.com	heather.tebbetts@libertyutilities.com
breed@solarcity.com	jack@revisionenergy.com
brianna@nhsea.org	james.brennan@oca.nh.gov
camerinos@nhec.com	jarvis@unitil.com
camilo.serna@eversource.com	jill.fitzpatrick@libertyutilities.com
canderson@borregosolar.com	jon.osgood@puc.nh.gov
carroll@unitil.com	kaminski@nhec.com
Christopher.aslin@doj.nh.gov	karen.cramton@puc.nh.gov
christopher.goulding@eversource.com	karen.sinville@libertyutilities.com
cynthia.trottier@psnh.com	kate@nhsea.org
david.shulock@puc.nh.gov	katherine.peters@nu.com
david.wiesner@puc.nh.gov	kerry.holmes@nh.gov
deandra.perruccio@nh.gov	kristi.davie@eversource.com
debski@unitil.com	leszek.stachow@puc.nh.gov
dhartford@clf.org	lois.jones@eversource.com
dlittell@raponline.org	lrichardson@jordaninstitute.org
donald.kreis@oca.nh.gov	manypennyh@nhec.com
downesm@unitil.com	matthew.fossum@eversource.com
edward.davis@eversource.com	maureen.karpf@libertyutilities.com
elizabeth.nixon@puc.nh.gov	mbirchard@clf.org
epler@unitil.com	mdean@mdeanlaw.net

melissa.price@eversource.com  
Meredith.hatfield@nh.gov  
michael.sheehan@libertyutilities.com  
michael.sisto@puc.nh.gov  
nicholas.cicale@oca.nh.gov  
palma@unitil.com  
pradip.chattopadhyay@oca.nh.gov  
ran@essexhydro.com  
rhonda.bisson@psnh.com  
richard.chagnon@puc.nh.gov  
richard.labrecque@eversource.com  
richard.minardjr@nh.gov  
rick.white@nu.com  
robert.bersak@nu.com  
sarah.knowlton@libertyutilities.com  
Stephen.Eckberg@puc.nh.gov  
Stephen.Hall@libertyutilities.com  
steven.mullen@libertyutilities.com  
taylorp@unitil.com  
tirwin@clf.org  
tom.frantz@puc.nh.gov