## STATE OF NEW HAMPSHIRE before the PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire d/b/a Eversource Energy 2020 Least Cost Integrated Resource Plan

## **DOCKET NO. DE 20-161**

## Petition for Intervention

Pursuant to the Order issued on October 14, 2020, by the New Hampshire Public Utilities Commission (the "Commission") in the above-captioned docket, N.H. Admin. Rules Puc 203.17, and in accordance with the standards of RSA 541-A:32, Clean Energy New Hampshire ("CENH") hereby petitions for leave to intervene late in this proceeding. In support of its Petition, CENH states the following:

1. CENH is a statewide nonprofit organization, which educates and advocates for sustainable energy in New Hampshire. It has residential, business, and municipal members across the state of New Hampshire. Its mission is to strengthen New Hampshire's economy and conserve natural resources by promoting a transition to clean, efficient, and renewable energy.

2. CENH has 500 members, including residential, municipal and business customers that are located in the service territory of Public Service Company of New Hampshire d/b/a Eversource Energy ("Eversource") and will be impacted by the decisions made in regard to Eversource's least cost integrated resource plan ("LCIRP").

3. Moreover, CENH has a strong interest in the following subject areas, all of which could be directly or indirectly impacted by the decisions made in this proceeding: electric vehicle charging tariffs; electric vehicle make ready investments; grid modernization; interconnection of distributed energy resources; net metering; energy storage; and non-wires-alternatives.

4. The rights, duties, privileges, immunities and other substantial interests of CENH and its members will be affected by the decisions made in this proceeding. Additionally, those decisions will impact the core issues for which CENH was created to advocate.

5. CENH has participated in many proceedings before the Commission in the past on behalf of its members and clean energy practices and regulation in New Hampshire.

6. CENH did not file a petition to intervene in 2020 when the docket first opened. Since January 2022, the organization has undergone an expansion in staffing that enables sufficient time to participate in the docket.

7. CENH recognizes that the docket is well underway and in being granted intervenor status, CENH would take the case and the procedural schedule as they are.

8. CENH has contacted the three parties to the docket, Eversource, the NH Office of Consumer Advocate, and the NH Department of Energy, regarding its late intervention. I am authorized to state that the parties have no objection to CENH's late intervention.

9. As such, CENH participation in the proceeding will be in the interest of justice and will not impair the orderly and prompt conduct of this proceeding, nor will it delay the proceedings.

10. Clean Energy New Hampshire respectfully requests that it be granted full intervenor status in this proceeding.

Dated at Littleton, New Hampshire, this 13<sup>th</sup> day of June, 2022.

## PRIMMER PIPER EGGLESTON & CRAMER PC

\_\_\_\_\_

By:

Elijah D. Emerson, Esq. Primmer Piper Eggleston & Cramer PC 106 Main Street P.O. Box 349 Littleton, NH 03561-0349 (603) 444-4008 eemerson@primmer.com