

The STATE OF NEW HAMPSHIRE
before the
THE PUBLIC UTILITIES COMMISSION

Docket No. IR 22-042
Investigation of Energy Efficiency
Planning, Programming, and Evaluation

PETITION TO INTERVENE
OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES

Pursuant to the Order of Notice issued on August 10, 2022, by the New Hampshire Public Utilities Commission (the "Commission") in the above-captioned docket, N.H. Code Admin. Rules PUC 203.17 and RSA 541-A:32, the New Hampshire Department of Environmental Services ("NHDES") requests leave to intervene in the above captioned matter. In support of this Petition, NHDES states as follows:

1. As NHDES is responsible for implementing laws, regulations, and policies that are protective of public health and the environment, NHDES has a "substantial interest" in environmental quality and public health, which are directly impacted by our energy system.
2. Fossil-fuel burning electric power plants are a significant source of criteria air pollutants in New Hampshire, including sulfur dioxide, nitrogen oxides, particulate matter, and mercury. In addition, electricity production is responsible for approximately fifteen percent of the greenhouse gas emissions generated in New Hampshire.
3. Energy efficiency, energy optimization, battery storage, and strategic electrification are all important, interrelated strategies for reducing the emission of criteria pollutants and greenhouse gases and can be applied to the building sector, industrial facilities, and the transportation sector.
4. NHDES has long history of involvement in New Hampshire energy planning and regulation, including PUC dockets that have the potential to impact the environment, such as:
 - a. Participation and/or intervention in numerous PUC dockets, including the CORE Energy Efficiency Programs (DE 10-188, DE 12-262, DE 14-210), the Resale of Electricity for EV Charging (IR 15-510), the Energy Efficiency Resource Standard (DE 15-137, DE 17-136), the Development of New Alternative Net Metering Tariffs (DE 16-576), the Investigation into Grid Modernization (IR 15-296), the Eversource Rate Case (19-057), the Liberty Utilities Rate Case (DE 19-064), the Investigation into Electric Vehicle Rate Design (IR 20-004), The Triennial Energy Efficiency Plan (DE 20-092) and the Petition for Electric Vehicle Make-Ready and Demand Charge Alternative Proposals (DE 21-078);
 - b. Testifying before the NH legislature on energy efficiency, the Regional Greenhouse Gas Initiative, grid modernization, strategic electrification, and battery storage; and

Motion of New Hampshire Department of Environmental Services

- c. Coordinating the development of the 2009 NH Climate Action Plan,¹ and the 2012 Final Report On the New Hampshire's Independent Energy Study.²
5. NHDES has a direct interest in the issues raised by the Commission in this docket, especially as they pertain to the design and delivery of energy efficiency programs as well as the use of funding for energy efficiency programs generated from the Regional Greenhouse Gas Initiative. NHDES was an active participant in the stakeholder process leading to the creation of the Energy Efficiency Resource Standard. It is our contention that NHDES's intervention in the docket will serve the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, NHDES requests that the Commission grant this Petition, allow NHDES to intervene in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted,

**NEW HAMPSHIRE DEPARTMENT OF
ENVIRONMENTAL SERVICES**

A handwritten signature in black ink, appearing to read "Craig A. Wright" followed by the initials "CAW".

Craig A. Wright
Director, Air Resources Division

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Dated: September 9, 2022

¹ CCPTF (2009). 2009 NH Climate Action Plan, Climate Change Policy Task Force, https://www.des.nh.gov/organization/divisions/air/tsb/tps/climate/action_plan/nh_climate_action_plan.htm, (Last Accessed July 11, 2019).

² EESE Board (2012). Final Report On the New Hampshire's Independent Energy Study, Energy Efficiency and Sustainable Energy Board, <http://www.puc.state.nh.us/EESE%20Board/Meetings/2012/20121116Mtg/VEIC%20-%20EESE%20Board%20Final%20Report%20-%20Formatted%20DRAFT%20111612.pdf>, (Last Accessed July 11, 2019).