

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

**Docket No. IR 22-053**

**Electric and Gas Utilities**

**Investigation of Energy Commodity Procurement (Renewable Portfolio Standard; Default Service Electric Power; Cost of Gas) Methodology and Process**

**CONSERVATION LAW FOUNDATION  
PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding in accordance with the New Hampshire Public Utilities Commission’s Order of Notice establishing this docket. Because this is an investigatory docket, CLF respectfully believes that the formal filing of an intervention petition is unnecessary and unwarranted pursuant to the statutes, procedural rules, and Commission’s past practices governing such dockets. Nevertheless, in support of its petition to intervene, CLF avers as follows:

1. CLF is a non-profit organization dedicated to protecting New England’s environment for the benefit of all people. CLF uses the law, science, and markets to create solutions that build healthy communities, sustain a vibrant economy, and preserve natural resources, including resources affected by the generation, transmission, and distribution of electric power and the transportation and use of natural gas. Consistent with its mission to promote thriving, resilient communities, CLF advances sound clean energy policies that strengthen New England’s—and New Hampshire’s—economic vitality. CLF has approximately 5,700 members in New England, including over 760 members in New Hampshire.

2. In this docket, the Commission will examine all pertinent aspects of the Renewable Portfolio Standard (“RPS”), Default Service, and Cost of Gas procurements in New Hampshire, and related Commission processes.

3. CLF represents itself and the interests of its members in securing the many economic and environmental benefits associated with the RPS. The continuation of the RPS program will help New Hampshire meet climate change and other environmental goals, lower the overall electricity bills that families and businesses must pay every month, constrain New Hampshire’s otherwise-growing share of regional grid costs, keep more money and jobs within the Granite State, and improve the health and welfare of New Hampshire communities.

4. CLF has significant institutional expertise in the subjects at issue in this proceeding. CLF participated in the Grid Modernization investigatory proceeding, Docket No. IR 15-2965, which involved several of the matters that will be investigated here. Moreover, CLF has engaged in several other dockets that involved the subjects at issue in this proceeding, including the Unitil Energy Systems, Inc. Request for Change in Rates docket, Docket No. 21-030, and the Energy North Natural Gas Petition for Approval of a Firm Transportation Agreement with Tennessee Gas Pipeline, LLC docket, Docket No. DG 21-008. Further, CLF has a history of advocacy on RPS legislation in New Hampshire and other New England states.

5. CLF has also intervened in numerous other dockets before the Commission over the past two decades, including the following Docket Nos.: DE 01-057; DE 07-064; DE 08-103; DE 08-145; DE 09-033; DE 10-160; DE 10-188; DE 10-261; DE 11-215; DE 11-250; DE 13-108; DE 13-275; DE 14-120; DE 14-238; IR 15-124; IR 15-296; DE 16-241; DE 16-576; DE 16-693; DE 16-817; DE 17-124; DG 17-152; DE 17-189; DG 17-198; DE 19-033; DE 19-104; IR 20-004; IR 20-166; DE 20-170; DG 21-008; DE 21-030; DG 21-036; and DE 21-078.

6. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. CLF has substantial expertise that will support the Commission's review of this plan. CLF has a long and constructive history of working closely with the utilities and other stakeholders on several of the issues that will be investigated in this docket, including in Docket No. IR 15-2965. In addition, intervention in this proceeding will allow CLF to represent the interests of CLF members who stand to benefit from the direct and indirect cost savings associated with potential changes to cost of gas and default service processes considered in this docket, as well as those who will benefit from the environmental and economic benefits resulting from the RPS.

7. As a result of CLF's expertise and experience, its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding. Moreover, allowing CLF to intervene will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, although CLF believes that formal intervention is unnecessary given the investigatory nature of this docket, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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