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THE ST ATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

Docket No. DE 15-137 ELECTRIC AND GAS UTILITIES Energy Efficiency Resource Standard

PETITION OF ACADIA CENTER TO INTERVENE OUT OF TIME

Pursuant to the Commission's Order of Notice dated May 8, 2015, N.H. Admin. Rules, PUC 203 .17, and in accordance with the standards of RSA 54 l-A:32, Acadia Center hereby submits this petition to intervene out of time in the above-captioned docket ("Petition").

In support of its Petition, Acadia Center states the following:

- 1. Acadia Center is a non-profit, research and advocacy organization committed to advancing the clean energy future in the Northeast. Acadia Center is at the forefront of efforts to build clean, low carbon and consumer friendly economies. Acadia Center's approach is characterized by reliable information, comprehensive advocacy and problem solving through innovation and collaboration.
- 2. As set forth in the Order of Notice, this docket seeks to establish an Energy Efficiency Resource Standard ("EERS") for New Hampshire, with the objective to define the savings targets and address issues related to public and private funding; program cost recovery; lost revenue recovery (e.g. decoupling); performance-based incentives and penalties; program administration; and evaluation, measurement and verification.
- 4. Energy efficiency has long been a major Acadia Center focus. Energy efficiency is a core part of an effective climate strategy. Acadia Center promotes policy models in the region that yield nation-leading investments, institutionalize efficiency as a top resource and ensure that efficiency investments thrive and expand over time.
- 5. Acadia Center serves as the representative of the environmental community on the Massachusetts Energy Efficiency Advisory Council, the Rhode Island Energy Efficiency and Resource Management Council, and the Connecticut Energy Advisory Board, and has had experience on issues such as setting effective targets and effective program administration.
- 6. Acadia Center experts have produced numerous analyses on the impacts of energy efficiency investments in the region, the best practices for the formation of state energy efficiency advisory boards, and have written extensively about the link between energy efficiency and decoupling mechanisms. Such reports include *Collaboration that*



Counts: The Role of State Energy Efficiency Stakeholder Councils¹, Winter Impacts of Energy Efficiency in New England², Best Practices for Advancing State Energy Efficiency Programs Policy Options & Suggestions³, and Energy Efficiency: Engine of Economic Growth⁴.

- 7. Acadia Center has participated in numerous proceedings before Public Utilities Commissions in other states in the region on behalf of clean energy policies, including in New Hampshire in DE 07-064. Acadia Center also provided input on energy efficiency as a stakeholder in the State Energy Strategy process last year, and as part of the Commission's investigation of an EERS (IR 15-072). Acadia Center wishes to participate in Docket DE 15-137 because it believes that its expertise and experience will be helpful in the Commission's consideration of the issues in this docket.
- 8. Acadia Center's petition should be granted, although late-filed after the May 29, 2015 date set forth in the Commission's Order of Notice.. Under RSA 541-A:32 II "The presiding officer may grant one or more petitions for intervention at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceeding."
- 9. Acadia Center's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. Acadia Center spends considerable time, effort, and resources working to ensure that least cost energy efficiency resources are procured in the New England states to mitigate environmental harm, including but not limited to those harms associated with climate change and local air pollution, while reduce reducing costs for energy consumers. Acadia Center has unique expertise in this matter that is not able to be adequately represented by other parties its interests are directly affected by this proceeding.
- 10. Acadia Center brings significant regional experience to this proceeding and its contributions would be in the interests of justice. Moreover, granting the Petition will not impair the interests of justice and the orderly and prompt conduct of the proceedings because it is being filed before any substantive matters have been determined by the Commission, and Acadia Center agrees to the procedural schedule already set herein.

WHEREFORE, Acadia Center respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

 $^1 Available \ at: \ \underline{http://acadiacenter.org/document/collaboration-that-counts-the-role-of-state-energy-efficiency-stakeholder-councils/$

² Available at: http://acadiacenter.org/document/winter-impact-electric-efficiency/

 $^{^3\,}Available\,at: \underline{http://acadiacenter.org/document/best-practices-for-advancing-state-energy-efficiency-programs-policy-options-suggestions/$

⁴ Available at: http://acadiacenter.org/document/energy-efficiency-engine-of-economic-growth/