

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

**Docket No. DE 19-104**

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE  
D/B/A/ EVERSOURCE ENERGY**

**Petition for Clean Innovation  
Community Solar Pilot Proposal**

**CONSERVATION LAW FOUNDATION  
PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the June 14, 2019 Order of Notice, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32. The Public Utilities Commission has initiated a proceeding to consider Eversource Energy’s (“Eversource”) petition for approval of its proposed “Clean Innovation Community Solar” pilot program. In its Order of Notice, the Commission directed interested parties to seek intervention by July 8, 2019.

In support of its petition for intervention, CLF states as follows:

1. CLF is a private, 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

5,000 financially contributing members in New England, including about 600 in New Hampshire, some of whom reside in the electric distribution territory of Eversource.

2. CLF has significant experience in the subjects at issue in this proceeding. To advance the interests of the region and its members, CLF has developed institutional expertise in areas including energy projects, markets, distributed generation, net metering, and community solar through active participation in regulatory proceedings in New Hampshire and across New England. CLF has previously advocated for increased access to distributed solar in New Hampshire, including in the recent net metering docket, DE 16-576, pursuant to which Eversource now files this petition. CLF was a signatory to the terms of a settlement agreement in that proceeding that advocated initiating low- and moderate-income solar pilots, which settlement term was adopted by the Commission in Order No. 26,029.

3. CLF's general involvement in New Hampshire energy matters has spanned more than two decades. This involvement includes intervention in numerous dockets before the Commission, such as Docket Nos.: DR 97-211, DE-01-057, DE 07-064, DE 08-103, DE 08-145, DE 09-033, DE 10-160, DE 10-188, DE 11-215, DE 11-250, DE 13-108, DE 13-275, DE 14-120, DE 14-238, DE 15-124, IR 15-124, IR 15-137, IR 15-296, DE 16-241, DE 16-576, DE 16-693, DE 16-817, DE 17-124, DE 17-136, DE 17-189, DG 17-152, DG 17-198, and DE 19-033. CLF is currently an active participant in ongoing stakeholder meetings to develop other pilot projects.

4. CLF and its members have a strong interest both in expanding the availability and ensuring the success of community solar and low- and moderate-income solar projects in the state, and in ensuring reasonable compensation mechanisms for distributed energy resources and other clean energy. CLF has long supported the increased penetration of distributed generation in

New Hampshire for purposes including reducing harmful greenhouse gas emissions, empowering consumers of electric power, reducing the need for costly and intrusively large infrastructure, and diversifying energy resources. CLF and its members are concerned about and directly affected by the need for reliable, affordable, and low-carbon energy resources with minimal terrestrial impacts, as well as the adverse effects of climate change. Community solar projects can enable those who wouldn't otherwise be able to access clean energy to do so, and this increased access improves health outcomes for low-income communities as well as New Hampshire residents in general. Increasing access to clean energy reduces the combustion of fossil fuels that is driving a dangerous transformation of the climate, helps to ensure a sustainable economy, and can reduce the severity of climate-related dangers for New Hampshire residents.

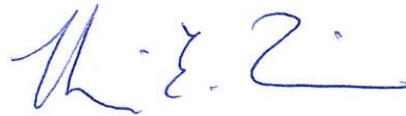
5. The rights, privileges, and interests of CLF and its members will be affected by the outcome of this proceeding. CLF members in the Eversource service territory will be particularly affected.

6. CLF respectfully submits that its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding due to its special expertise and experience.

7. CLF's participation is in the interests of justice and the orderly and prompt conduct of this proceeding, and will neither delay nor disrupt this proceeding.

**WHEREFORE**, Conservation Law Foundation respectfully requests that the Commission grant its petition to intervene in Docket No. DE 19-104.

Respectfully submitted,



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Melissa E. Birchard  
Senior Attorney  
Conservation Law Foundation  
27 N. Main St.  
Concord, NH 03301  
Phone: (603) 225-3060  
Fax: (603) 225-3059  
[mbirchard@clf.org](mailto:mbirchard@clf.org)

Dated: July 8, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Petition to Intervene has, on this 8<sup>th</sup> day of July, 2019, been sent by email to the service list in Docket No. DE 19-104.



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Melissa E. Birchard  
Conservation Law Foundation