

**The STATE OF NEW HAMPSHIRE
before the
THE PUBLIC UTILITIES COMMISSION**

**DOCKET NO. DE 21-078
Electric Distribution Utilities
Make-Ready and Demand Charge Alternative Proposals**

**PETITION TO INTERVENE
OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES**

Pursuant to N.H. Code Admin. Rules PUC 203.02 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. The transportation sector is the largest source of air pollution and greenhouse gases (GHGs) emissions in the state, responsible for approximately 45 percent of the GHGs emitted in New Hampshire in 2018, and electric vehicles (EVs) present a significant opportunity to reduce those emissions;
3. 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 was responsible for approximately 13 percent of New Hampshire’s greenhouse gas emissions in 2018;
4. Peak electrical demand in the ISO-NE region is associated with not only the most-costly energy supply, but also the highest level of emissions for air pollution and GHGs. Achieving the largest environmental benefit from EVs requires mitigating the impact that the growing number of EVs on the road has on peak load;
5. NHDES has long history of involvement in New Hampshire energy planning and regulation, including:
 - 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), and the NH Utilities’ 2021-2023 Triennial Energy Efficiency Plan (DE 20-092);
 - b. Testifying before the NH legislature on energy efficiency, the Regional Greenhouse Gas Initiative, grid modernization, strategic electrification, and battery storage;
 - c. Serving on the Senate Bill 517 (2018) Electric Vehicle Charging Station Infrastructure Commission; and

Motion of New Hampshire Department of Environmental Services

- d. 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
6. NHDES has a direct interest in the issues raised by this docket, especially as they pertain to the impact that vehicles have on public health and environmental quality in New Hampshire, and 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 accepts the current procedural schedule for this docket and 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**



Michael Fitzgerald
Assistant Director, Air Resources Division

29 Hazen Drive
Concord, NH 03302
(603) 271-6390
William.M.Fitzgerald@des.nh.gov

Dated: August 11, 2021

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 November 2, 2020).

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 November 2, 2020).

Motion of New Hampshire Department of Environmental Services

Certificate of Service

I hereby certify that on August 11, 2021, an electronic copy of the foregoing was sent via electronic mail to Commission, to the Utilities, and all other persons on the DE 20-170 Service List consistent with the Secretarial Letter of April 16, 2021.

A handwritten signature in black ink, appearing to read "Michael Fitzgerald", with a large, stylized loop at the end.

Michael Fitzgerald
Assistant Director, Air Resources Division
NH Department of Environmental Services

View Service Lists

[Home](#) ([../Regulatory/regulatory.htm](#))[A](#) [A](#) [A](#)

Service List - Docket Related

Docket# : 21-078

Printed: 8/11/2021

Email Addresses

ClerksOffice@puc.nh.gov
kevin.boughan@eversource.com
brian.d.buckley@energy.nh.gov
davecaron@derrynh.org
richard.t.chagnon@energy.nh.gov
jessica.chiavara@eversource.com
edward.davis@eversource.com
mikefowler@derrynh.org
thomas.c.frantz@energy.nh.gov
donald.kreis@oca.nh.gov
jeff.moulton5@gmail.com
elizabeth.r.nixon@energy.nh.gov
amanda.o.noonan@energy.nh.gov
ocalitigation@oca.nh.gov
brian.rice@eversource.com
agustin.ros@brattle.com
sanem.sergici@brattle.com

Without Email Addresses

All

ClerksOffice@puc.nh.gov

Kevin Boughan
Eversource Energy
780 N. Commercial St.
Manchester NH 03105-0330
kevin.boughan@eversource.com

Brian Buckley
Department of Energy
21 S. Fruit St.
Concord NH
brian.d.buckley@energy.nh.gov

David R Caron
Town of Derry
14 Manning St.
Derry NH 03038
davecaron@derrynh.org

Richard Chagnon
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
richard.t.chagnon@energy.nh.gov

Jessica Chiavara
Eversource Energy

jessica.chiavara@eversource.com

Edward A Davis
Eversource Energy
107 Selden St
Berlin CT 06037
edward.davis@eversource.com

Mike Fowler

mikefowler@derrynh.org

Thomas Frantz
Department of Energy
21 South Fruit St Ste 10
Concord NH 03301
thomas.c.frantz@energy.nh.gov

D. Maurice Kreis
Office of Consumer Advocate
21 South Fruit St Ste 18
Concord NH 03301
donald.kreis@oca.nh.gov

Jeff Moulton

jeff.moulton5@gmail.com

Liz Nixon

Department of Energy

21 South Fruit St Ste 10

Concord NH 03301

elizabeth.r.nixon@energy.nh.gov

Amanda Noonan

Department of Energy

21 South Fruit St Ste 10

Concord NH 03301

amanda.o.noonan@energy.nh.gov

OCA Litigation

OCA Litigation

21 South Fruit St Ste 18

Concord NH 03301

ocalitigation@oca.nh.gov

Brian J Rice

Eversource Energy

brian.rice@eversource.com

Agustin Ros

agustin.ros@brattle.com

Sanem Sergici

sanem.sergici@brattle.com