

STATE OF NEW HAMPSHIRE

before the

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 08-120

2009 CORE Energy Efficiency Programs

MOTION TO INTERVENE OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES

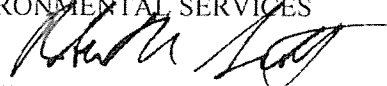
NOW COMES the New Hampshire Department of Environmental Services (DES) pursuant to PUC 203.02 and RSA 541-A:32,I(b) and requests leave to intervene in the above captioned matter. In support of this motion, DES states as follows:

1. DES is responsible for implementing laws and regulations that are protective of public health and the environment.
2. Fossil-fuel burning electric power plants emit substantial quantities of air pollutants such as sulfur dioxide, nitrogen oxides, particulate matter and mercury. In addition, electricity production is responsible for approximately one third of the greenhouse gas emissions generated in New Hampshire. Energy efficiency measures, which avoid having to generate electricity, avoid emissions of all pollutants. Front-end pollution prevention strategies, such as energy efficiency and conservation, eliminate emissions of harmful pollutants to the air rather than just diminish them or shift their environmental impact to another media such as water or land.
3. The Office of Energy and Planning and the Office of the Consumer Advocate concur with this request.
4. DES has a direct interest in the issues raised by the utilities' filing in this docket, especially as they pertain to the design and delivery of energy efficiency programs and the potential interaction with the newly formed forward capacity market as well as upcoming funding for energy efficiency programs through the Regional Greenhouse Gas Initiative. DES was an active participant in the stakeholder process leading to the creation of the CORE programs in 2002, and has intervened in subsequent CORE dockets. DES's intervention will not impair the orderly conduct of the proceedings.

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

Respectfully submitted,

NEW HAMPSHIRE DEPARTMENT OF
ENVIRONMENTAL SERVICES




Robert R. Scott
Director
Air Resources Division

Certificate of Service

I certify that on this date a copy of the foregoing was hand-delivered to PUC staff and the Office of Consumer Advocate, and sent via first-class United States mail to the Utilities and all other persons on the Service List in DE 08-120.

October 23, 2008



Robert R. Scott
Director, Air Resources Division
NH Department of Environmental Services