

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

**Docket No. DE 10-188**

**2011-2012 CORE Electric Energy Efficiency Programs  
and Natural Gas Energy Efficiency Programs**

**PETITION TO INTERVENE OF THE CONSERVATION LAW FOUNDATION**

Pursuant to the Commission's Order of Notice dated August 12, 2010, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32, the Conservation Law Foundation ("CLF") hereby petitions for leave to intervene in the above-captioned docket. In support of its petition, CLF states the following:

1. CLF is a private, non-profit environmental membership organization dedicated to the protection and responsible use of New England's natural resources, including resources affected by the generation, production, distribution and/or use of natural gas and electricity. CLF, through its Clean Energy and Climate Change Program, represents the interests of its members in ensuring that environmental impacts resulting from the generation, production, distribution and/or use of natural gas and electricity in New Hampshire and the region are minimized. CLF has over 3,300 members, including approximately 370 members residing in New Hampshire.
2. As set forth in the Order of Notice, this proceeding addresses, *inter alia*, the nature and extent of energy efficiency initiatives to be implemented by the state's electric and gas utilities, funding for such programs and the performance incentives for implementing utilities.
3. The supply of electricity and natural gas from utilities and use by New Hampshire ratepayers results in environmental consequences. Natural gas is a fossil fuel which, when

combusted for energy, results in emissions of greenhouse gases and other air pollutants.

Generating electricity by combusting fossil fuels causes emissions of pollutants to the atmosphere. The extraction, production, transportation and storage of natural gas also result in adverse impacts to the environment. By improving energy efficiency, the adverse effects of electricity generation and natural gas production, and use by New Hampshire ratepayers are reduced. Increased energy efficiency provides a means towards achieving state and regional climate change mitigation and environmental goals, decreases ratepayer costs and fosters economic sustainability.

4. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. Intervention will allow CLF to protect its members' substantial interests in the deployment of energy efficiency resources to reduce the environmental impacts resulting from electricity and natural gas production, distribution and use in New Hampshire. The economic interests of CLF's New Hampshire members as ratepayers are also directly affected by this proceeding, including by the rate design for funding energy efficiency programs. These issues raise important environmental concerns which, as set forth above, will affect the rights, duties and privileges of CLF and its members.

5. CLF's policy and program experience includes over twenty years of extensive collaborative work and participation in numerous utility commission dockets throughout New England addressing energy efficiency deployment. CLF was a party in docket DE-07-064, the NH PUC Investigatory Docket Regarding Rate Mechanisms to Encourage Utility Investment in Energy Efficiency and similar dockets in other states. CLF has also appeared before the Commission in various dockets addressing utility issues. CLF's institutional expertise in these

matters will inform its participation and benefit the Commission's deliberations. Allowing CLF to intervene will not impair the orderly and prompt conduct of the proceedings.

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

Respectfully submitted,

CONSERVATION LAW FOUNDATION

By:



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Dated: August 26, 2010

CERTIFICATE OF SERVICE

I hereby certify that on the 26<sup>th</sup> day of August, 2010, a copy of the foregoing Petition to Intervene by the Conservation Law Foundation was sent electronically, and by First Class Mail, to all other interested parties on the DE 10-188 Service List.

Dated in Concord, New Hampshire this 26th day of August 2010.



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