

**BEFORE THE NEW HAMPSHIRE  
PUBLIC UTILITIES  
COMMISSION**

**DE 16-384**

**UNITIL ENERGY SYSTEMS, INC.**

**Notice of Intent to File Rate Schedules**

**PETITION TO INTERVENE OF THE  
ENERGY FREEDOM COALITION OF AMERICA**

Pursuant to RSA 541-A:32 and N.H. Code Admin. Rules Puc 203.17, the Energy Freedom Coalition of America (“EFCA”), by and through its undersigned counsel, respectfully submits this Petition to Intervene (“Petition”) in the above-captioned proceeding.

**1. Introduction**

EFCA<sup>1</sup> is a national advocacy group that believes every person has a right to generate their own electricity and seeks to promote awareness of the benefits of distributed energy resources (“DERs”) through public advocacy. EFCA members provide DER products and services to residential, commercial, industrial, and government customers to help them manage energy consumption and costs, reduce the environmental impacts of energy generation, and enjoy greater consumer choice. The DER products and services provided by EFCA members include backup battery storage, demand management, solar electric and thermal generation, and solar lighting systems.

Pursuant to RSA 541-A:32, a petition for intervention shall be granted if the petitioner demonstrates they have “rights, duties, privileges, immunities or other substantial interests

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<sup>1</sup> EFCA’s membership includes SolarCity Corporation, Silevo Solar, LLC, Zep Solar, LLC, Go Solar, LLC, 1 Sun Electric, LLC, and Ecology Energy Systems.

[that] may be affected by the proceeding,” and “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

EFCA has a substantial interest in this proceeding and its intervention will not impair the interests of justice and orderly and prompt conduct. EFCA therefore respectfully requests that Commission grant this Petition.

**2. EFCA’s rights, duties, privileges or other substantial interests will be affected by this proceeding.**

EFCA and its members have a direct and substantial interest in this proceeding. EFCA’s members are presently offering distributed energy services to residents in New Hampshire, including services for the installation of net metered, rooftop solar facilities to customers in Unitil Energy Services, Inc.’s (“Unitil” or “Company”) service territory. Unitil proposes to substantially modify existing tariffs for all customers by increasing monthly fixed charges. Unitil proposes to segregate certain DER customers into a separate rate class and to then impose demand charges on those customers utilizing DERs. These specific proposed rate design changes will make it more difficult for customers interested in investing in rooftop solar and DERs to utilize those technologies to reduce their electric bills. The structural rate changes proposed by the Company in this proceeding, thus, create a potential barrier to entry for prospective DER customers and will have a direct and substantial impact on EFCA members’ activities in the state.

EFCA and its members have a unique interest in this proceeding that will not be adequately represented by any other party. EFCA’s members offer a broad range of distributed energy services that will be impacted by the Company’s proposals and rate increase, including rooftop solar and energy storage devices to residential and non-residential customers. Therefore, EFCA requests intervention in this docket to represent and protect the unique and

distinct interests of its members.

**3. The interests of justice and orderly and prompt conduct will not be impaired by allowing EFCA to intervene in this proceeding.**

EFCA's intervention will not impair the interests of justice or the orderly and prompt functioning of this proceeding. EFCA anticipates that its participation in this proceeding will not expand the scope of issues or the timelines the Commission establishes, thereby ensuring the orderly and prompt conduct of this proceeding.

**4. Conclusion**

For the foregoing reasons, EFCA respectfully requests the Commission grant this Petition.

Respectfully submitted,

/s/ Thadeus B. Culley

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Counsel for Energy Freedom Coalition of  
America

May 25, 2016

**CERTIFICATE OF SERVICE**

**RE: Docket # DE 16-384, Unitil Energy Systems, Inc.  
Notice of Intent to File Rate Schedules**

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record on the attached service list in accordance with the requirements of N.H. Admin. Rule Puc 203.11.

Dated this 25<sup>th</sup> of May, 2016.

*Blake Elder*

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**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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