

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

**Docket No. DE 17-189**

**LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.,  
d/b/a LIBERTY UTILITIES**

**Petition to Approve Battery Storage Pilot Program**

**CONSERVATION LAW FOUNDATION  
PETITION TO INTERVENE**

Conservation Law Foundation (“CLF”) hereby petitions to intervene in the above-captioned proceeding, pursuant to the December 13, 2017 Order of Notice, N.H. Admin. Rules, Puc 203.17, and in accordance with the standards of RSA 541-A:32. In accordance with the aforementioned Order of Notice, the Public Utilities Commission (“Commission”) has initiated a proceeding to consider the “approval of a pilot program in which Liberty would buy and install batteries and related equipment for up to 1,000 residential customers with the goals of saving transmission costs and studying other potential system benefits.” In its Order of Notice, the Commission directed interested parties to seek intervention by January 2, 2018.

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 members in New England, including over 530 members in New Hampshire, some of whom reside in the electric distribution territory of Liberty Utilities.

2. CLF has significant institutional expertise in the subjects at issue in this proceeding. CLF is currently a participant in numerous proceedings across the region that concern battery storage and non-wires alternatives. Through these and other proceedings, including before the states and at NEPOOL, CLF maintains expertise in grid modernization, non-transmission alternatives, distributed generation, demand response, and energy efficiency. CLF also has significant experience in the areas of electric reliability and rate development. In addition, CLF has participated in proceedings concerning the siting of large infrastructure projects, in New Hampshire and in other New England states.

3. CLF's substantial involvement in New Hampshire energy matters has spanned two decades. This involvement includes intervention in numerous dockets before the Public Utilities 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 16-693, DE 16-817, DE 17-124, and DE 17-136. CLF is currently an active participant in ongoing stakeholder meetings to develop pilot projects, including non-wires alternative projects, pursuant to the Commission's Order in Docket DE 16-576.

4. CLF and its members have a strong interest in expanding the availability of reliable and clean battery storage options in the state, and well as in ensuring sound non-wires alternative planning and robust consumer choice. The rights, privileges, and interests of CLF

and its members will be affected by the outcome of this proceeding. CLF members in the Liberty service territory may be particularly affected.

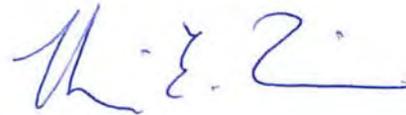
5. CLF respectfully submits that its intervention as a party in this proceeding is likely to elucidate important issues and facilitate an expeditious and just resolution of this proceeding, as a result of CLF's special expertise and experience.

6. CLF's participation is in the interests of justice and the orderly and prompt conduct of the proceeding. CLF's participation 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 17-189.

Respectfully submitted,

CONSERVATION LAW FOUNDATION



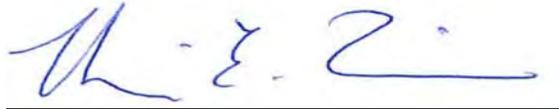
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Dated: January 2, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Petition to Intervene has, on this 2<sup>nd</sup> day of January, 2018, been sent by email to the service list in Docket No. DE 17-189.



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Melissa E. Birchard  
Conservation Law Foundation