

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

**Docket No. DE 20-092
Electric and Gas Utilities
2021-2023 Triennial Energy Efficiency Plan**

**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. 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 is responsible for approximately fifteen percent of the greenhouse gas emissions generated in New Hampshire.
3. Energy efficiency, energy optimization, battery storage, and strategic electrification are all important, interrelated strategies for reducing the emission of criteria pollutants and greenhouse gases and can be applied to the building sector, industrial facilities, and the transportation sector.
4. 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), and the Investigation into Electric Vehicle Rate Design (IR 20-004);
 - b. Testifying before the NH legislature on energy efficiency, the Regional Greenhouse Gas Initiative, grid modernization, strategic electrification, and battery storage; and
 - c. 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

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 July 11, 2019).

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 July 11, 2019).

Motion of New Hampshire Department of Environmental Services

5. NHDES 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 forward capacity market, as well as the use of funding for energy efficiency programs generated from the Regional Greenhouse Gas Initiative. NHDES has been an active participant in the stakeholder process leading to the creation of the Energy Efficiency Resource Standard. 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**




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Dated: September 10, 2020

Certificate of Service

I hereby certify that on September 10, 2020, an electronic copy of the foregoing was sent via electronic mail to Commission, to the Utilities, and all other persons on the DE 20-092 Service List consistent with the Secretarial Letter of March 17, 2020 and the Order of Notice dated September 8, 2020.

A handwritten signature in cursive script that reads "Craig A. Wright".

Craig A. Wright
Director, Air Resources Division
NH Department of Environmental Services