

The STATE OF NEW HAMPSHIRE
before the
THE PUBLIC UTILITIES COMMISSION

DOCKET NO. DE 20-170
Electric Distribution Utilities
Electric Vehicle Time-of-Use Rates

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. The transportation sector is the largest source of air pollution and greenhouse gases (GHGs) emissions in the state, responsible for approximately 45 percent of the GHGs emitted in New Hampshire in 2018, and electric vehicles (EVs) present a significant opportunity to reduce those emissions;
3. 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 was responsible for approximately 13 percent of New Hampshire’s greenhouse gas emissions in 2018;
4. Peak electrical demand in the ISO-NE region is associated with not only the most-costly energy supply, but also the highest level of emissions for air pollution and GHGs. Achieving the largest environmental benefit from EVs requires mitigating the impact that the growing number of EVs on the road has on peak load;
5. 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), the Investigation into Electric Vehicle Rate Design (IR 20-004), and the NH Utilities’ 2021-2023 Triennial Energy Efficiency Plan (DE 20-092);
 - b. Testifying before the NH legislature on energy efficiency, the Regional Greenhouse Gas Initiative, grid modernization, strategic electrification, and battery storage;
 - c. Serving on the Senate Bill 217 (2018) Electric Vehicle Charging Station Infrastructure Commission; and


Motion of New Hampshire Department of Environmental Services

- d. 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
6. NHDES has a direct interest in the issues raised by this docket, especially as they pertain to the impact that vehicles have on public health and environmental quality in New Hampshire, and 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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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 November 2, 2020).

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 November 2, 2020).

Motion of New Hampshire Department of Environmental Services

Certificate of Service

I hereby certify that on November 3, 2020, an electronic copy of the foregoing was sent via electronic mail to Commission, to the Utilities, and all other persons on the DE 20-170 Service List consistent with the Secretarial Letter of March 17, 2020 and the Order of Notice dated March 16, 2020.

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

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