

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

**Docket No. DE 21-030**

**Unitil Energy Systems Inc.  
Request for Change in Rates**

**NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES  
PETITION TO INTERVENE**

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 one third of the greenhouse gas emissions generated in New Hampshire.
3. Energy efficiency, energy optimization, battery storage, and beneficial 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. Relative to transportation, the deployment of electric vehicle (EV) charging equipment and the cost of operating EVs are key factors that influence the adoption rate of this advanced technology by New Hampshire consumers.
5. Utility rate structures will influence the modernization of the electrical grid and the evolution of distribution utilities, which will in turn influence the deployment and efficacy of each mentioned pollution reduction strategies. The structure of electric rates will, therefore, have a direct impact on public health and of the environment quality.
6. 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), Net-Metering (DE 16-576), Grid Mod (IR 15-296), Eversource Rate Case (DE 20-057), Liberty Rate Case (DE 20-064), and Time of Use Rate Case (DE 20-170).

*Motion of New Hampshire Department of Environmental Services*

- b. Sitting on and providing staff support for the ongoing Electric Vehicle Charging Stations Infrastructure Commission (“SB517 (2018) Commission”);<sup>1</sup>
  - c. Testifying before the NH legislature on renewable energy, the Regional Greenhouse Gas Initiative, grid modernization, beneficial electrification, and battery storage; and
  - d. Coordinating the development of the 2009 NH Climate Action Plan,<sup>2</sup> and the 2012 Final Report On the New Hampshire’s Independent Energy Study.<sup>3</sup>
7. Given the role that energy efficiency, energy optimization, energy storage, and beneficial electrification, all of which are directly impacted by rate structures, will play in the coming century to further improve overall environmental quality and mitigate climate change, 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: April 19, 2021

<sup>1</sup> [Electric Vehicle Charging Stations Infrastructure Commission](https://www.des.nh.gov/organization/divisions/air/tsb/tps/msp/sb517.htm), <https://www.des.nh.gov/organization/divisions/air/tsb/tps/msp/sb517.htm> (Last Accessed July 11, 2019).

<sup>2</sup> CCPTF (2009). [2009 NH Climate Action Plan](https://www.des.nh.gov/organization/divisions/air/tsb/tps/climate/action_plan/nh_climate_action_plan.htm), Climate Change Policy Task Force, [https://www.des.nh.gov/organization/divisions/air/tsb/tps/climate/action\\_plan/nh\\_climate\\_action\\_plan.htm](https://www.des.nh.gov/organization/divisions/air/tsb/tps/climate/action_plan/nh_climate_action_plan.htm), (Last Accessed July 11, 2019).

<sup>3</sup> EESE Board (2012). [Final Report On the New Hampshire’s Independent Energy Study](http://www.puc.state.nh.us/EESE%20Board/Meetings/2012/20121116Mtg/VEIC%20-%20EESE%20Board%20Final%20Report%20-%20Formatted%20DRAFT%20111612.pdf), 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).

**Certificate of Service**

I hereby certify that on July 18, 2019, the original and six (6) copies of the foregoing were hand-delivered to the PUC and sent via electronic mail to the Utilities and all other persons on the DE 19-057 Service List.



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NH Department of Environmental Services

