

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

**Docket No. DE 23-068**

**Electric and Gas Utilities  
2024-2026 Triennial Energy Efficiency Plan**

**CONSERVATION LAW FOUNDATION  
PETITION TO INTERVENE**

Conservation Law Foundation (CLF) hereby petitions to intervene in the above-captioned proceeding in accordance with N.H. Admin. Rules, Puc 203.17 and with the standards of RSA 541-A:32. In support of its petition to intervene, CLF avers as follows:

1. CLF is a 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 5,430 members in New England, including over 740 members in New Hampshire.

2. In this docket, the Public Utilities Commission (Commission) will review the draft statewide 2024-2026 energy efficiency plan proposed by the New Hampshire Utilities in a filing on June 30, 2023.

3. CLF represents itself and the interests of its members in securing the many economic and environmental benefits associated with increased energy efficiency deployment. A robust and well-targeted energy efficiency program will help New Hampshire meet climate change and other environmental targets, lower the overall electricity bills that families and businesses must pay every month, constrain New Hampshire's otherwise-growing share of regional grid costs, keep more money and jobs within the Granite State, and improve the health and welfare of New Hampshire communities including low-to-moderate income residents.

4. Energy efficiency has been a major CLF priority since CLF spearheaded the publication in 1987 of "Power to Spare," which was the first comprehensive, regional effort to assess the economic and technical potential for increased energy efficiency and to set a policy and action agenda for public officials and utilities to achieve that potential. "Power to Spare" laid the groundwork for the energy efficiency programs underway throughout New England.

5. CLF has engaged in a wide range of advocacy to advance the region's energy efficiency policies, including the energy efficiency programs overseen by the state public utility commissions. CLF's history of participation in Commission dockets regarding energy efficiency dates to at least 1997 in Docket No. DR 97-211. CLF constructively participated in the docket that established the Energy Efficiency Resource Standard (EERS), Docket No. DE 15-137, and was a signatory to the settlement that was approved by the Commission on August 2, 2016, in Order No. 25,932. CLF participated in the docket for the 2018-2020 statewide energy efficiency plan, Docket No. DE 17-136, and was a signatory to the settlement agreement for the 2018-2020 plan, which was approved by the Commission on January 2, 2018, in Order No. 26,095. CLF also participated in workshops and other public programs related to the development of the 2021-2023 statewide energy efficiency plan. In particular, CLF was a member of the EERS Committee of the

Energy Efficiency and Sustainable Energy (EESE) Board, where, together with other stakeholders, it developed initial recommendations for strengthening various components of the draft 2021-2023 statewide energy efficiency plan. Thereafter, CLF intervened and participated in Docket No. DE 20-092, in which the Commission considered the 2021-2023 statewide energy efficiency plan. More recently, CLF has participated in workshops with the New Hampshire Utilities and other stakeholders to discuss the development of the 2024-2026 statewide energy efficiency plan.

6. CLF has also intervened in numerous other dockets before the Commission over the past two decades, including the following Docket Nos.: DE 01-057; DE 07-064; DE 08-103; DE 08-145; DE 09-033; DE 10-160; DE 10-188; DE 10-261; DE 11-215; DE 11-250; DE 13-108; DE 13-275; DE 14-120; DE 14-238; IR 15-124; DE 16-241; DE 16-576; DE 16-693; DE 16-817; DE 17-124; DG 17-152; DG 17-198; DE 19-033; DE 19-104; IR 20-004; IR 20-166; DE 20-170; DG 21-008; DE 21-030; DG 21-036; DE 21-078; IR 22-042; IR 22-053; DG 22-064; and IR 22-076.

7. CLF and CLF's New Hampshire members have a direct and substantial interest in the outcome of this proceeding. The 2024-2026 statewide energy efficiency plan will set the direction for state energy efficiency work for years to come. CLF has substantial expertise that will support the Commission's review of this plan. CLF has a long and constructive history of working closely with the utilities and other stakeholders on energy efficiency, including in Docket Nos. DE 15-137, DE 17-136, and DE 20-092, to improve energy efficiency programs in the state. In addition, intervention in this proceeding will allow CLF to represent the interests of CLF members who stand to benefit from the direct and indirect cost savings associated with energy efficiency investments, as well as those who will benefit from reduced emissions.

8. As a result of CLF's special expertise and experience, 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. CLF's participation will neither delay nor disrupt this proceeding. Further, the interests of CLF and its members are not adequately represented by any other party.

WHEREFORE, CLF respectfully requests that it be granted full intervenor status in this proceeding.

Respectfully submitted,

CONSERVATION LAW FOUNDATION

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