

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

Docket No. DG 17-152

**LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.,
d/b/a LIBERTY UTILITIES**

2017 Least Cost Integrated Resource Plan

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

Pursuant to the New Hampshire Public Utilities Commission's (the "Commission") Order No. 26,225 ("Order") dated March 13, 2019, 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. The Order directed Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities ("Liberty") to submit a supplemental filing to its 2017 Least Cost Integrated Resource Plan ("LCIRP") filed on October 2, 2017, including:

"supporting testimony, to address each of the specific elements required under RSA 378:38 and RSA 378:39 that are not already addressed in its LCIRP, with adequate sufficiency to permit the Commission's assessment of potential environmental, economic, and health-related impacts of each option proposed in the LCIRP, as required by RSA 378:39. Those specific elements are set forth in RSA 378:38, V and VI, and in RSA 378:39."
2. NHDES was advised of the Order following the Technical Session on June 20, 2019, during which the NHDES was identified as a potential source of information relative to the environmental and public-health requirements listed in RSA 378:38 and 378:39.
3. As NHDES is responsible for implementing laws and regulations that are protective of public health and the environment, NHDES has a "substantial interest" in environmental quality and public health, which is directly impacted by our energy system.
4. In the building sector, fuel-switching, energy efficiency, energy optimization, and beneficial electrification are all important interrelated strategies for reducing the emission of criteria pollutants and greenhouse gases. The evolution of the natural gas distribution system is related to each mentioned strategy and, therefore, that evolution is an important element in the state's overall strategy to protect environmental quality and public health.
5. NHDES has long history of involvement in New Hampshire energy planning and regulation, including:
 - a. Participation and 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), and Grid Mod (IR 15-296);

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- b. Testifying before the NH legislature on renewable energy, the Regional Greenhouse Gas Initiative, grid modernization, beneficial 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
6. NHDES's intervention will serve the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, NHDES 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: July 18, 2019

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).

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 DG 17-152 Service List.

A handwritten signature in black ink, appearing to read "Craig A. Wright".

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