

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

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Determination Regarding PSNH's Generating Assets  
Docket No. DE 14-238

**PETITION TO INTERVENE OF THE CITY OF MANCHESTER**

The City of Manchester ("City") hereby respectfully petitions to intervene in the above-captioned docket pursuant to RSA 541-A: 32 and Puc §§ 203.02 and 203.17. In support of its Petition, the City says the following:

1. In 2014, the Legislature passed and the Governor signed HB 1602, which requires, in part, that the New Hampshire Public Utilities Commission to commence and expedite a proceeding relating to the generating assets of Public Service Company of New Hampshire ("PSNH"). On September 16, 2014, the Commission issued an order of notice beginning that review and calling for requests for intervention to be filed by September 29, 2014. Among the issues noted in the order of notice is the status of the 1999 restructuring settlement agreement in Docket No. DE 99-099, and its application in this docket.

2. The City participated in Docket No. DE 99-099 and the review of the restructuring settlement agreement in that docket. Section VIII. E. of the restructuring settlement agreement provides that municipalities with certain interests may have the opportunity to purchase certain of PSNH's hydroelectric generating facilities outside of an auction process. PSNH's Amoskeag Hydro facility is located within the boundaries of the City and the City has an interest in determining whether it can reach agreement with PSNH on a potential purchase and sale of that facility on terms acceptable to the City, PSNH and the Commission. If such an agreement

cannot be reached, the City has a unique interest in determinations about the value of that facility in light of its location.

3. In that the City has an interest in this docket that is specific and unique, it is clear that the City has rights, duties, privileges, immunities, and other substantial interests that may be affected by the proceeding. Accordingly, the City requests to be a full intervenor in this proceeding pursuant to RSA 541-A:32 and the Commission's rules.

WHEREFORE, the City respectfully requests that the Commission make the City a full intervenor, and to order such further relief as may be just and equitable.

Respectfully submitted,

**The City of Manchester**

9/26/14  
Date

By Theodore Gatsas

**CERTIFICATE OF SERVICE**

I hereby certify that, on the date written below, I caused the attached Petition to Intervene to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

\_\_\_\_\_  
Date

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