

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 BERLIN

The City of Berlin ("**the City**") hereby requests to intervene in this 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. On September 16, 2014, the Public Utilities Commission ("**PUC**") issued an order of notice opening a docket to make a determination on PSNH's ownership of generation, including its hydro plants. The PUC identified one of the issues as "the status of the 1999 restructuring settlement agreement with PSNH in Docket No. DE 99-099, and its application to issues in this docket." That 1999 Settlement Agreement contains, among other things, a preference for certain municipalities with respect to PSNH's hydro facilities. In that PSNH's Smith hydro facility is located in Berlin, the City has specific interests in the preferences that are in that Settlement Agreement.
2. Additionally, since PSNH's Smith hydro facility is one of the most valuable taxable assets located within the City, the City has specific interests in participating in this process that will impact the ownership and operations of the Smith hydro facility.
3. Because the City has a direct interest in the 1999 Settlement Agreement and in the City's tax base, the City likewise has an interest in this docket and the City's interests will be affected by the PUC's decisions in the docket. Therefore, the City meets the

statutory requirements for intervention and should be made a full intervenor in this proceeding.

WHEREFORE, the City of Berlin requests that the City be made a full intervenor in this docket.

Respectfully submitted,

The City of Berlin

By and through its City Attorney

By:



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9/26/14
Date

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.

9/26/14
Date


Christopher L. Boldt, Esq.