

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

DE 16-817

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY

Auction of Electric Generation Facilities

**PETITION TO INTERVENE
OF CONSERVATION LAW FOUNDATION**

Pursuant to the Commission's Order of Notice dated September 7, 2016, and in accordance with the standards of RSA 541-A:32 and NH Code of Administrative Rules Puc 203.17, Conservation Law Foundation (CLF) hereby petitions for leave to intervene in the above-captioned docket, as follows:

1. By Order of Notice dated September 7, 2016, the Public Utilities Commission (Commission) commenced this proceeding to implement the divestiture process for the electric generation facilities owned and operated by Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) as approved in Order No. 25,920. The Order of Notice states that the proceeding shall be implemented on an expedited basis and establishes a deadline of September 15, 2016 for the filing of petitions to intervene.
2. CLF is a private, non-profit member-supported organization dedicated to using the law, science, and the market 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 in New Hampshire and across New England. CLF has approximately 3,317 members, including approximately 443 members who reside in New Hampshire, some of whom are customers of Eversource.

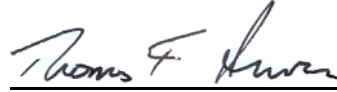
3. CLF and its members, including but not limited to members who are Eversource customers, have a strong and direct interest in environmental and economic considerations associated with the operation of fossil fuel fired power plants currently owned and operated by Eversource, including its coal-fired electric generating facilities; the structure of New Hampshire's electric market, including the completion of restructuring; and the economic implications of divestiture and stranded costs. CLF has intervened in multiple dockets before the Commission related to fossil fuel generated energy, such as Dockets DE 01-057, DE 08-103, DE 08-145, DE 10-188, DE 11-250, DE 13-108, DE 13-275, DE 14-238, and DE 16-241. Of particular relevance, CLF was granted intervener status in Docket DE 14-238, the precursor to this docket, in which the Commission approved the 2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement (Agreement). An active participant in Docket DE 14-238, CLF was a signatory to the Agreement, as well as to the Partial Litigation Agreement approved by the Commission in that docket.

4. As set forth above, and as demonstrated in prior interventions, CLF has substantial interests that may be affected by this proceeding, and its intervention would neither impair the interests of justice nor the orderly and prompt conduct of the proceedings. RSA 541-A:32,I. *See also* RSA 541-A:32,II. Indeed, CLF's expertise in issues pertaining to New Hampshire's and the region's energy markets will inform its participation and benefit the Commission's consideration of issues involved in this docket. CLF also appreciates and values the expedited nature of this proceeding. For the above reasons, CLF should be granted intervention. RSA 541-A:32,I. *See also* RSA 541-A:32,II.

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

Respectfully submitted,

CONSERVATION LAW FOUNDATION



Thomas F. Irwin
V.P. and Director, CLF New Hampshire

Conservation Law Foundation
27 N. Main Street
Concord, NH 03301
(603) 225-3060
tirwin@clf.org

Dated: September 15, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing petition has on this 15th day of September, 2016 been sent by email to the service lists in Docket No. DE 16-817 and Docket No. DE 14-238, as well as the Office of Consumer Advocate.



Thomas F. Irwin (NH Bar No. 11302)