

PETITION TO INTERVENE

In Re: Order of Notice DE-09-067
The State of New Hampshire Public Utilities Commission
Complaint of Clean Power Development, LLC filed 4/7/09




I, David A. Borden, State Representative, District No. 18, Rockingham County and resident of New Castle, New Hampshire, wish to intervene in Order of Notice DE-09-067 scheduled for hearing November 3, 2009 for the following reasons:

As a PSNH ratepayer and representative of the residents of New Castle and Rye, I am concerned that adoption of the least-cost principle is not being implemented. Electricity to be generated from the Clean Power Development, LLC (CPD) facility in Berlin is potentially below the cost of self-generated electricity by Public Service Company of New Hampshire (PSNH) owned assets, thus, there is an opportunity to lower the average cost to ratepayers. Secondly, there is the concern that PSNH may have chosen to enter a purchase power agreement with an alternative supplier in Berlin at apparently higher price and without adequate due diligence. For example, has it analyzed the impact on the sustainable biomass supply within a 35 mile radius of this potential alternate supplier where CPD has done such an analysis? It would appear that PSNH decisions related to renewable energy supply do not consider the goals of the 2009 New Hampshire Climate Action Plan including to “increase renewable and low-CO2-emitting sources in a long term sustainable manner.”

It appears that PSNH further ignores CPD’s business plan which to create an efficient modern biomass plant which has the potential to produce electric power efficiently as well as provide heat for a nearby paper mill (thus protecting North Country jobs), to generate methane gas from the adjacent wastewater treatment plant, create bio fuels and provide district heating in Berlin. This business plan, plus the availability of sustainable local supply of wood chips would appear to protect the ratepayers from the spikes of cost and unpredictability of supply of fossil fuel. Thus PSNH, by ignoring a potential least cost and renewable supplier, is ignoring the interests of its ratepayers for short term gain.

To me PSNH as a “regulated monopoly” utility with protected territory and other favorable business protection is obliged to operate in the “public good” and, therefore, has a requirement to place value on all the favorable aspects related to the proposed CPD project when doing a least-cost analysis. I must question the PSNH business plan when it chooses to ignore significant opportunities to serve their customer base in a way that would also better serve the “public good” and protect our economy and environment.

Very Truly Yours,


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