

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DE 10-261**

**Public Service Company of New Hampshire  
2010 Least Cost Integrated Resource Plan**

**GRANITE RIDGE ENERGY, LLC's PETITION TO INTERVENE**

Granite Ridge Energy, LLC ("GRE") respectfully petitions the New Hampshire Public Utilities Commission ("Commission") for authorization to intervene in this proceeding under RSA 541-A:32 and NH Administrative Rule Puc 203.17. In support of this petition, GRE represents as follows:

1. By Order of Notice dated November 3, 2010, the Commission opened this docket to consider Public Service Company of New Hampshire's ("PSNH's") 2010 Least Cost Integrated Resource Plan ("LCIRP"), and invited parties seeking to intervene to file petitions setting forth their interests by November 12, 2010.

2. The standard for intervention is set out in RSA 541-A:32, I (b) and (c), which provide that a petition to intervene shall be granted if: ...

- (b) The petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and
- (c) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

3. The substantial economic interests of GRE may be affected by this proceeding and, therefore, this petition should be granted. GRE owns and operates the

Granite Ridge electric generating facility, a 720 MW combined cycle gas turbine merchant power plant located in Londonderry, New Hampshire.

4. GRE produces highly efficient, cost-effective, low-emission electric power. It sells its energy and capacity into the New England wholesale power markets administered by ISO-New England — the same markets from which PSNH purchases much of the power it needs to supplement its owned generation resources and contract purchases. GRE is thus familiar with and directly affected by the economics and structures of the competitive markets on which PSNH relies for up to 30% of its current annual energy service requirements, and it will be directly affected by this proceeding to the extent that assumptions and forecasts regarding the natural gas markets and related energy costs may affect the outcome of the proceeding. In addition, GRE is particularly qualified to provide the Commission and the parties with an independent perspective and useful analysis bearing on LCIRP issues 3 and 4 as set forth in the Order of Notice — namely, the assessment of PSNH's supply options and the energy market administered by ISO-NE.

5. As a natural gas-fired electric generating facility, GRE is also well-positioned to provide the Commission and the parties with useful information and insights on LCIRP issues 5 and 7 — i.e., PSNH's provision for diversity in power supply sources and an assessment of the LCIRP's long- and short-term environmental, economic, and energy price and supply impact on the state. GRE has a substantial interest in the consideration and resolution of these issues.

6. Granting this petition will not impair the interests of justice or the orderly and prompt conduct of the proceedings. As a source of information that may help to

inform the Commission and the parties on significant issues in this proceeding, GRE's participation Docket DE 10-261 would advance both the public interest and the interests of justice, and would facilitate the orderly and prompt conduct of the proceedings.

For the reasons set forth above, GRE respectfully requests that the Commission grant this petition for intervention in Docket DE 10-261, and for such other relief as may be deemed just and appropriate.

Respectfully submitted,

GRANITE RIDGE ENERGY, LLC

By its attorneys,

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November 12, 2010

CERTIFICATE OF SERVICE

In accordance with Puc 203.02 (3) and (4) and Puc 302.11, I have caused copies of this Petition to Intervene to be served on each person on the Commission's service list for Docket DE 10-261.

November 12, 2010

Howard M. Moffett  
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