

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

**DE 10-261**

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

**Petition to Intervene  
of  
The New England Power Generators Association, Inc.**

**I. INTRODUCTION**

Pursuant to the Order of Notice issued November 3, 2010, by the Public Utilities Commission of New Hampshire (“PUC”), the New England Power Generators Association, Inc. (“NEPGA”) hereby respectfully files this timely Petition to Intervene in the above-captioned proceeding. NEPGA requests that all further correspondence, communications and other documents relating to this matter be directed to the following individuals:

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**II. BACKGROUND**

On September 30, 2010, the Public Service Company of New Hampshire (“PSNH”) filed their 2010 Least Cost Integrated Resource Plan (“Plan”) in PUC Docket 10-261 pursuant to RSA 378:37 and PUC Orders No. 24,945 and 25,061. As highlighted in the PUC’s November 3<sup>rd</sup> Order of Notice, the Plan describes the following:

- 1) the methodology and assumptions used to develop PSNH’s delivered energy and peak demand forecasts, and illustrated forecast scenarios; 2) PSNH’s participation in the State’s CORE energy-efficiency programs, and other PSNH demand-side management programs, and their interrelation to PSNH’s resource planning; 3) assessment of PSNH’s supply options; 4) the energy market currently administered by the Independent System Operator (ISO-NE) and how ISO-NE coordinates and plans transmission in New England, including PSNH’s transmission system; 5) PSNH’s provision for diversity in power supply sources; 6) assessment of PSNH’s planning compliance with the Clean Air Act Amendments of 1990 and the National Energy Policy Act of 1992; 7) assessment of

the Plan's long-and short-term environmental, economic, and energy price supply impact on the state; 8) PSNH's compliance with the New Hampshire Renewable Portfolio Standard; and 9) a continuing unit operation study for PSNH's Newington Station.

### **III. INTERVENTION OF NEPGA**

NEPGA is the largest trade association representing competitive electric generating companies in New England. NEPGA's member companies represent approximately 27,000 megawatts of generating capacity throughout the region, and over 2,600 megawatts located in New Hampshire. NEPGA's mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy.

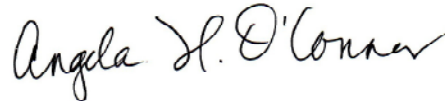
NEPGA's member companies have been involved in the design and development of all of the competitive wholesale markets in the United States during the last ten years. In that time, markets, especially in the ISO-NE region, have developed the necessary framework to support robust competition. NEPGA is equally committed to the continued evolution of competitive wholesale markets, to further the economic and reliability benefits that markets can deliver to consumers and the economy as a whole.

According to the PUC's Order of Notice, the filing of the Plan raises issues related to whether PSNH's planning process is consistent with RSA Chapter 374, Electric Utility Restructuring. As such, the PUC will be evaluating PSNH's planning process which includes the procurement of energy and capacity from the ISO New England markets. As active generator participants in the ISO-NE markets, NEPGA's member companies have substantial and direct interests in the outcome of this proceeding, and those interests cannot be adequately represented by any other party in the proceeding.

### **IV. CONCLUSION**

NEPGA hereby respectfully requests that the PUC consider its timely Petition to Intervene as submitted herein.

Respectfully submitted,



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