

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

DE 17-124

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

Sale of Generating Facilities

**PETITION TO INTERVENE OF
CONSERVATION LAW FOUNDATION**

Pursuant to the Public Utilities Commission's ("Commission") Order of Notice dated August 3, 2017, 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 August 3, 2017, the Commission commenced this proceeding to review the results of the auction process for the sale of Public Service Company of New Hampshire d/b/a Eversource Energy's generation facilities, as provided by Order No. 25,920 and pending in Docket No. DE 16-817. The Order of Notice states that the proceeding shall be implemented on an expedited basis, and established a deadline of August 15, 2017 for the filings of petitions to intervene. Petitioner CLF became aware of the Order of Notice by its email distribution on August 16, 2017, and accordingly, submits its petition to intervene that same day, one day after the deadline established in the Order of Notice.
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 4,700 members, including approximately 520 members who reside in

New Hampshire, some of whom are customers of Eversource Energy.

3. CLF and its members, including but not limited to members who are Eversource Energy 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 Energy, 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 intervenor status in the docket regarding the auction of Eversource Energy's electric generation facilities, DE 16-817, as well as in DE 14-238, the precursor to that 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, including its active involvement in proceedings leading up to Eversource's divestiture of its generating assets, 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



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Dated: August 16, 2017

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing petition has on this 16th day of August, 2017 been sent by email to the service list in Docket No. DE 17-124, as well as the Office of Consumer Advocate and Eversource Energy.



Thomas F. Irwin (NH Bar No. 11302)