

THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DE 11-184

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

**Joint Petition for Approval of Power Purchase and Sale Agreements
and Settlement Agreement**

**GRANITE STATE HYDROPOWER ASSOCIATION'S
PETITION TO INTERVENE**

NOW COMES Granite State Hydropower Association ("GSHA"), by and through its undersigned attorneys, and, pursuant to RSA 541-A:32, I (b) and (c) and N.H. Admin. Rule Puc 203.17, respectfully requests that it be permitted to intervene in the above-captioned docket. In support of this Petition, GSHA states as follows:

1. By Order of Notice issued August 25, 2011, the Commission opened this docket to consider the petition for approval of (1) five power purchase agreements (the "Wood PPAs") between PSNH and five woodburning independent power producers (Bridgewater Power Company, L.P., Pinetree Power, Inc., Pinetree Power Tamworth, Inc., Springfield Power, LLC, and Indeck Energy – Alexandria, LLC), (2) a settlement, release and support agreement between PSNH, the Wood IPPs and Berlin Station, LLC, Laidlaw Berlin BioPower, LLC and Cate Street Capital, Inc., and (3) a proposal for the ratemaking treatment relating to the costs of the Wood PPAs.

2. The standard of intervention is set forth in NH RSA 541-A:32, I (b) and (c), which provide that a petition to intervene shall be granted if it “states facts demonstrating that the Petitioner’s rights or other substantial interests may be affected by the proceeding...” and 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. GSHA is a membership organization representing approximately 45 small hydroelectric power projects located in New Hampshire. Most GSHA member projects sell power at wholesale to one or another of New Hampshire’s four regulated electric distribution utilities under rate orders issued by the Commission or via negotiated power purchase agreements. The regulated electric distribution utilities, in turn sell power at retail to their distribution customers.

4. As independent power producers, GSHA’s members have a substantial interest in the proposed terms of the Wood PPAs. The interests of a number of GSHA’s members could be affected by this proceeding because they expect to enter into power purchase agreements with wholesale power purchasers upon the expiration of their current rate orders or power purchase agreements. The impact of the proposed Wood PPAs on the competitive wholesale market is of direct interest to GSHA’s members.

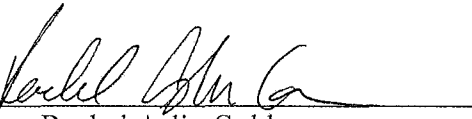
5. In light of the foregoing, GSHA’s members’ rights, duties, privileges, and other substantial interests may be affected by this proceeding. GSHA, therefore, qualifies for intervention in this docket.

WHEREFORE, GSHA respectfully requests that it be permitted to intervene in this proceeding.

Respectfully submitted,

GRANITE STATE HYDROPOWER
ASSOCIATION


By its attorneys,
ORR & RENO, P.A.

By: 
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Dated: September 6, 2011

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 6th day of September, 2011 been either sent by electronic or first class mail, postage prepaid, to persons listed on the Service List.


Rachel Aslin Goldwasser

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