



## CITY OF MANCHESTER

*Theodore L. Gatsas*  
*Mayor*

December 4, 2013

Ms. Debra Howland  
Executive Director  
State of NH  
Public Utilities Commission  
21 South Fruit St., Suite 10  
Concord, NH 03301

**Re: DE 13-248**

Dear Ms. Howland:

Please consider this a formal Petition to Intervene in the above referenced docket.

The City of Manchester is one of the largest, if not the largest, participant in the EOL rate classification referenced in DE 13-248. We are also a customer of Public Service Company of New Hampshire (PSNH), spending approximately One Point Four Million Dollars (\$1,400,000) annually on street lighting through the EOL tariff.

The City has a substantial interest in seeking energy reducing opportunities, including but not limited to the application of LED technology for street lights. This is demonstrated in the Order Approving Settlement Agreement on Permanent Rates No. 25,123 dated June 28, 2010 (DE 09-035).

We have had numerous discussions over multiple years with PSNH representatives encouraging incorporation of LED technology into the EOL classification.

We only recently learned of these proceedings before the PUC through other parties.

Because of these facts we therefore have substantial interest in the proceeding.

In accordance with RSA 541-A:32 the presiding officer may grant "petitions for intervention at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings".

(continued)

The City's interests in the proceedings are well established. Absent the City's ability to participate and comment the interests of justice would not be served.

With regard to the orderly and prompt conduct of the hearings we would respectfully request the Commission to consider the timeframe of events leading to this docket.

The Commission issued an Order in June of 2010 requiring, among other things, PSNH to continue to monitor developments relative to LED technology. This order was issued 41 months ago. Accordingly, we find it disingenuous on the part of PSNH to request the commission to issue an order approving the new offering and rate within 30 days after having taken almost four years to conduct their research.

We believe the orderly and prompt conduct of the hearings will not only be maintained, but will be enhanced, by allowing the City to intervene, as it appropriately should.

Furthermore we contend that extending the timeframe associated with the hearings, and the proceedings, in order to allow the true stakeholders, the ratepayers, adequate time for preparation and response to be in the public interest and accordingly in the interest of justice.

I appreciate your consideration of this request, in advance. I am available should you have any questions.

Regards,

A handwritten signature in black ink, reading "Ted Gatsas". The signature is fluid and cursive, with the first name "Ted" and last name "Gatsas" clearly legible.

Theodore L. Gatsas, Mayor  
City of Manchester, NH

cc: Her Excellency Margaret Hassan  
The Hon. Chris Pappas, Executive Councilor  
The Hon. David Boutin, Senate District 16  
The Hon. Donna Soucy, Senate District 18  
The Hon. Lou D'Allesandro, Senate District 20  
Office of the Consumer Advocate  
PSNH  
Board of Aldermen  
Kevin Sheppard, Director of Public Works