

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Determination Regarding PSNH's Generating Assets
Docket No. DE 14-238

PETITION TO INTERVENE OF THE TOWN OF GORHAM

The Town of Gorham ("**the Town**") hereby requests to intervene in this docket pursuant to RSA 541-A: 32 and Puc §§ 203.02 and 203.17. In support of its Petition, the Town says the following:

1. On June 26, 2015, the Public Utilities Commission ("**PUC**") issued a Supplemental Order of Notice in docket DE 14-238 scheduling a prehearing conference regarding various scheduling issues concerning the approval of that certain Settlement Agreement filed with the Commission on June 10, 2015 concerning PSNH's ownership of generation, including its hydro plants. This Supplemental Order of Notice also provided that, pursuant to Puc 203.17, any parties wishing to intervene should file a Petition to Intervene on or before July 7, 2015.
2. Furthermore, in the September 16, 2014 Order of Notice for this matter, the PUC identified one of the issues as "the status of the 1999 restructuring settlement agreement with PSNH in Docket No. DE 99-099, and its application to issues in this docket." That 1999 Settlement Agreement contains, among other things, a preference for certain municipalities with respect to PSNH's hydro facilities. In that PSNH's Gorham hydro facility is located in Gorham, the Town has specific interests in the preferences that are in that Settlement Agreement.

3. Additionally, since PSNH's Gorham hydro facility is one of the most valuable taxable assets located within the Town, the Town has specific interests in participating in this process that will impact the ownership and operations of the Gorham hydro facility.
4. Because the Town has a direct interest in the 1999 Settlement Agreement and in the Town's tax base, the Town likewise has an interest in this docket and the Town's interests will be affected by the PUC's decisions in the docket. Therefore, the Town meets the statutory requirements for intervention and should be made a full intervenor in this proceeding.

WHEREFORE, the Town of Gorham requests that the Town be made a full intervenor in this docket.

Respectfully submitted,
The Town of Gorham
By and through its Special Counsel

6/26/15
Date


By:


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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Petition to Intervene to be served pursuant to N.H. Code Admin. Rule Puc 203.11.

6/26/15
Date


Christopher L. Boldt, Esq.