STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

Docket No. DE 15-462

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE D/B/A EVERSOURCE ENERGY

Petition to Cross Public Waters

Petition to Intervene of Northern Pass Transmission LLC

Northern Pass Transmission LLC ("NPT") by and through its attorneys, McLane Middleton, Professional Association, hereby petitions the Public Utilities Commission ("Commission") to be granted full intervenor status in the above-captioned proceeding. In support of its request, NPT states as follows:

- 1. RSA 541-A:32, II provides that the Commission "may grant one or more 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." In addition, RSA 541-A:32, I provides that the Commission shall grant a petition to intervene if, among other things, the petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests may be affected by the proceeding," and the Commission "determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention."
- 2. NPT is a limited liability company organized under the laws of the State of New Hampshire engaged in the business of developing, designing, construction, owning and maintaining a high voltage electric transmission line and related facilities in New Hampshire (the NPT line). NPT is a subsidiary of Eversource Energy, a utility holding company with headquarters in Boston, Massachusetts, and Hartford, Connecticut.

3. The Petition for approval to cross public waters was filed simultaneously with NPT's and Eversource Energy's joint application to the New Hampshire Site Evaluation Committee ("SEC") for a Certificate of Site and Facility for a 192-mile electric transmission line ("Project"). In addition, NPT's use of existing Eversource Energy right-of-way for the proposed Project pursuant to a lease agreement between Eversource and NPT that is the subject of another petition currently pending before the Commission. As a joint applicant for the Project and the counter-party to the lease agreement, NPT has a substantial interest that may be affected by the proceeding. Further, granting NPT full intervenor status will not impair the orderly and prompt conduct of this proceeding.

WHEREFORE, Northern Pass Transmission, LLC respectfully requests that the Commission grant it full intervenor status in this proceeding.

Respectfully submitted,

Northern Pass Transmission LLC

By Its Attorneys

McLANE MIDDLETON, PROFESSIONAL ASSOCIATION

Date: March 30, 2016

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Petition to Intervene has been forwarded to all persons on the Commission's Service List by electronic mail.

Dated: March 302016

Thomas B. Getz