

**THE STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

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

Petition for Approval of Lease Agreement Between Public Service Company of New Hampshire  
d/b/a Eversource Energy and Northern Pass Transmission LLC

Docket No. DE 15-464

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**  
**D/B/A EVERSOURCE ENERGY'S PARTIAL OBJECTION**  
**TO THE LATE-FILED PETITION TO INTERVENE OF ROBERT J. COTE AND**  
**BRUCE A. ADAMI**

Pursuant to New Hampshire Code of Administrative Rules Puc 203.07 and RSA chapter 541-A, Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH" or the "Company") hereby submits a partial objection to the late-filed petition to intervene filed by Robert J. Cote and Bruce A. Adami (the "Petitioners") in the above-captioned docket. In support of its partial objection, PSNH states the following:

1. On October 19, 2015, PSNH filed a petition for approval of a lease transaction between it and Northern Pass Transmission LLC ("NPT") whereby PSNH would lease to NPT certain real estate rights owned by PSNH. Pursuant to the Commission's January 29, 2016 order of notice in the docket, requests to intervene were due no later than February 17, 2016.
2. On October 4, 2016, the Petitioners submitted a late-filed petition to intervene in the docket arguing that they intervention was justified because they own property in Deerfield that is covered by one or more of the easements contained in the proposed lease.

3. Though untimely, PSNH does not object to the above-referenced intervention as it relates to landowners with property covered by the proposed lease. PSNH does, however, submit this partial objection to state its position relative to the scope of the potential intervention. As with similar intervention petitions filed in this docket, the Petitioners base their intervention on their status as landowners who have land that might be affected by the NPT project. To the extent that the Petitioners may seek to use this docket or the Commission's process to for discussions or decisions on the legal rights relating to the underlying property, PSNH objects to such discussions or decisions.
4. Pursuant to RSA 541-A:32, III, and Puc 203.17, the Commission may limit an intervention to, among other things, "designated issues in which the intervenor has a particular interest." In light of the above, PSNH hereby requests that if the Commission grants the Petitioners' intervention request, it limit intervention to the issues in which they may have a particular interest and over which the Commission has jurisdiction, which would exclude any considerations relating to properties not included in the lease, any rulings upon the scope of the underlying land rights, or any ruling on the legal ability of PSNH to transfer the rights it owns.
5. PSNH also requests that for the sake of administrative efficiency, the Commission consider combining intervenors pursuant to RSA 541-A:32, III. There are other landowners already participating in the docket (including other landowners in Deerfield) that have based their interventions on arguments substantially similar to that of the Petitioners. Additionally, PSNH reiterates its concern that continuing to allow untimely filed requests to intervene may affect the prompt and orderly conduct of the proceedings.

WHEREFORE, PSNH respectfully requests that the Commission:

- (1) Limit the Petitioners' participation as described if the petition to intervene is granted; and
- (2) Order such further relief as may be just and equitable.

Respectfully submitted,

**Public Service Company of New Hampshire d/b/a  
Eversource Energy**

October 5, 2016  
Date

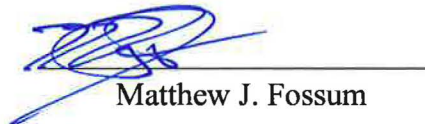
By: 

Matthew J. Fossum  
Senior Counsel  
780 North Commercial Street  
Post Office Box 330  
Manchester, New Hampshire 03105-0330  
(603) 634-2961  
Matthew.Fossum@eversource.com

#### **CERTIFICATE OF SERVICE**

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

October 5, 2016  
Date

  
Matthew J. Fossum