

STATE OF NEW HAMPSHIRE

before the

PUBLIC UTILITIES COMMISSION

DE 16-693

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY
Petition for Approval of a Power Purchase Agreement with Hydro Renewable Energy Inc.

OFFICE OF ENERGY AND PLANNING
PETITION TO INTERVENE

NOW COMES the Office of Energy and Planning (OEP), through counsel the Office of the Attorney General, and pursuant to N.H. Code of Admin. Rules Puc 203.17 and RSA 541-A:32, respectfully petitions to intervene in the above-captioned proceeding as a full party. In support of this petition, OEP states the following:

1. OEP is an Executive Branch agency charged with serving as the State's Energy Office and advising the Governor on matters pertaining to energy policy.
2. OEP, and its precursor agency, the Governor's Office of Energy and Community Services ("OECS"), has long been an active participant in matters regarding the application of New Hampshire's restructuring law, RSA 374-F, to Public Service Company of New Hampshire. OECS was a signatory to the PSNH 1999 Restructuring Settlement Agreement in Docket DE 99-099, which initiated the restructuring process, and more recently, OEP was a full party in Docket No. DE 14-238 and a signatory to the 2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement and the subsequent Partial Litigation Settlement Agreement, which were approved by the Commission in Order No. 25,920.
3. Eversource's petition in this docket raises questions regarding the interplay between the proposed PPA and both the restructuring principles of RSA 374-F, generally, and

the provisions of the 2015 Public Service Company of New Hampshire Restructuring and Rate Stabilization Agreement, specifically. OEP has an ongoing interest in these issues.

4. OEP's intervention in this docket would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings. If allowed to intervene, OEP will abide by the Commission's rules and procedural schedule developed in this docket.

WHEREFORE, OEP respectfully requests that this Honorable Commission grant this Petition and allow OEP to intervene as a full party in this proceeding, and to grant such other relief as the Commission finds just and proper.

Respectfully submitted,

OFFICE OF ENERGY AND PLANNING

by its attorney,

Joseph A. Foster
Attorney General

Dated: September 13, 2016

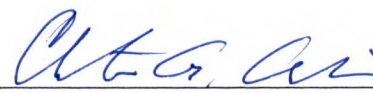


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Certificate of Service

I hereby certify that a copy of the foregoing Petition has been sent by e-mail this day to the members listed on the service list in DE 16-693.

Dated: September 13, 2016



Christopher G. Aslin, Esq.