

THE STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DE 10-151

HOLYOKE GAS & ELECTRIC DEPARTMENT

**Application for Certification to Produce Class IV
Renewable Energy Certificates**

**GRANITE STATE HYDROPOWER ASSOCIATION'S
PETITION TO INTERVENE**

NOW COMES Granite State Hydropower Association ("GSHA"), by and through its undersigned attorneys, and, pursuant to RSA 541-A:32, I (b) and N.H. Admin. Rule Puc 203.17, respectfully requests that it be permitted to intervene in the above-captioned docket. In support of this Petition, GSHA states as follows:

1. GSHA's membership includes approximately 45 small hydroelectric power projects located throughout New Hampshire. GSHA was actively involved in developing the legislation that established New Hampshire's renewable portfolio standard ("RPS") program, and several of GSHA's members are qualified as Class IV facilities eligible to receive renewable energy certificates ("RECs"). GSHA, therefore, has a substantial interest in the implementation of the New Hampshire RPS statute, RSA 362-F, and in the New Hampshire REC market.

2. Because the principal issue to be adjudicated in this docket is whether the Commission erred in denying Holyoke Gas & Electric Department's ("Holyoke's") application for certification to produce Class IV RECs, this case necessarily involves the implementation of RSA 362-F. In addition, the outcome of this case will have an effect

on the REC market by either maintaining the status quo or increasing the number of RECs which, in turn, will likely affect the market price of RECs.

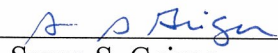
3. In light of the foregoing, GSHA's members' rights, duties, privileges, immunities and other substantial interests may be affected by this proceeding. GSHA, therefore, qualifies for intervention in this docket, as it has in other dockets involving applications similar to Holyoke's. *See, e.g., Public Service Company of New Hampshire*, DE 08-053 and *FPL Maine Hydro, LLC*, DE 08-123 and DE 08-124.

WHEREFORE, GSHA respectfully requests that it be permitted to intervene in this proceeding.

Respectfully submitted,

GRANITE STATE HYDROPOWER ASSOCIATION

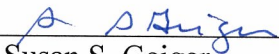
By its attorneys,
ORR & RENO, P.A.

By: 
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Dated: December 1, 2010

Certificate of Service

I hereby certify that a copy of the foregoing Petition has on this 1st day of December been either sent by electronic or first class mail, postage prepaid, to persons listed on the Service List.


Susan S. Geiger