

STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

**DE 010-195**  
**PSNH**

**Petition for Approval of Power Purchase Agreement with  
Laidlaw Berlin BioPower, LLC**

PETITION FOR INTERVENTION

NOW COMES Clean Power Development, LLC (“CPD”) and hereby petitions the New Hampshire Public Utilities Commission for intervention in the above-captioned proceeding pursuant to RSA 541-A:32 and NH Code Admin. Rule Puc 203.17. In support of its Petition for Intervention, Petitioner says the following:

1. On July 26, 2010, Public Service Company of New Hampshire (PSNH) filed a petition for approval of a power purchase agreement (PPA) with Laidlaw Berlin BioPower, LLC (Laidlaw) for the purchase of energy, capacity and renewable energy certificates (RECs) pursuant to RSA 362-F:9. According to the petition, the proposed Laidlaw facility is a biomass-fueled renewable energy source and purchases by PSNH will help it meet obligations to purchase renewable power as required by RSA 362-F provided that the Laidlaw facility qualifies to produce Class I (new renewable facility) RECs.

2. On September 1, 2010, the Commission issued an Order of Notice opening this proceeding. According to the Commission:

[t]he filing raises, inter alia, issues related to the terms and conditions of the PPA, how the costs of the PPA will be recovered, and whether the PPA meets the requirements of RSA 362- F:9 and is in the public interest.

Order of Notice at 2.

3. Petitions for Intervention, pursuant to RSA 541-A:32 and Rule Puc 203.17, must set for the facts demonstrating that the petitioner’s right’s, duties, privileges, immunities, or other substantial interests may be affected by the proceeding, and that the interest of justice and the prompt and orderly conduct of the proceedings would not be impaired by allowing the intervention.

4. CPD is a New Hampshire limited liability company that focuses on the development of renewable and sustainable wood-fueled biomass-energy facilities. CPD has biomass energy projects under development in Berlin, NH and Winchester, NH. CPD has a Complaint pending before the Commission in DE-09-067 that raises issues related to PSNH's willingness to discuss a power purchase agreement with CPD.

5. Accordingly, CPD has a substantial interest that will be affected by the Commission's deliberations in this proceeding.

WHEREFORE, CPD hereby respectfully requests the Commission to grant it intervener party status and to order such other and further relief as may be just and equitable.

Respectfully submitted,  
CLEAN POWER DEVELOPMENT, LLC  
By its Attorney

**/s/ James T. Rodier**  
1500A Lafayette Road, No. 112  
Portsmouth, NH 03801-5918  
603-559-9987

Dated: September 24, 2010

Certification of Service

Pursuant to Rules Puc 203.02(2) and Puc 203.11, I have served copy of this petition on each person identified on the commission's service list for this docket.

**/s/ James T. Rodier**