

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

DE 10-195

**Petition for Approval of Power Purchase Agreement
between PSNH of NH and Laidlaw Berlin BioPower, LLC**

**Petition to Intervene
of
The New England Power Generators Association, Inc.**

I. INTRODUCTION

Pursuant to the Order of Notice issued by the Public Utilities Commission of New Hampshire (“PUC”) dated September 1, 2010, the New England Power Generators Association, Inc. (“NEPGA”) hereby respectfully files this timely Petition to Intervene in the above-captioned proceeding. NEPGA requests that all further correspondence, communications and other documents relating to this matter be served upon the undersigned.

II. BACKGROUND

Public Service Company of New Hampshire (“PSNH”) filed a Petition for Approval of Power Purchase Agreement in Docket 10-195 on July 26, 2010 seeking approval of a multi-year purchase power agreement with Laidlaw Berlin BioPower, LLC (“LBB”). PSNH has requested approval from the PUC to purchase the energy and capacity produced by LBB’s proposed 70 MW biomass plant in Berlin, NH to meet its default service needs. Additionally, PSNH intends to purchase the Renewable Energy Credits (“RECs”) produced by LLB’s plant in order to meet a portion of its requirement pursuant to the state’s Renewable Portfolio Standard (“RPS”).

III. INTERVENTION OF NEPGA

NEPGA is the largest trade association representing competitive electric generating companies in New England. NEPGA’s member companies represent approximately 27,000 megawatts of generating capacity throughout the region, and over 2,600 megawatts located in New Hampshire. NEPGA’s mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy.

NEPGA's member companies have been involved in the design and development of all of the competitive wholesale markets in the United States during the last ten years. In that time, markets, especially in the ISO-New England (“ISO-NE”) region, have developed the necessary framework to support robust competition. As active generator participants in the ISO-NE day-ahead and real-time markets, NEPGA’s members are committed to the continued evolution of

competitive wholesale markets to further the economic and reliability benefits that markets can deliver to consumers and the economy as a whole. Accordingly, NEPGA's member companies have a specific interest in ensuring that PSNH's solicitation process in this proceeding was fair and open to all willing participants in order to procure the most reliable and cost-effective electricity available.

For the above-mentioned reasons, NEPGA's member companies have substantial and direct interests in the outcome of this proceeding, and those interests cannot be adequately represented by any other party in the proceeding.

IV. CONCLUSION

NEPGA hereby respectfully requests that the PUC consider its timely Petition to Intervene as submitted herein.

Respectfully submitted,



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