

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

ELECTRIC RENEWABLE PORTFOLIO STANDARD

RSA 362-F:4, VI Adjustments to Class III Renewable Portfolio Requirements
Docket No. DE 13-021

**PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S
PETITION TO INTERVENE**

Public Service Company of New Hampshire (“PSNH” or the “Company”) hereby respectfully petitions to intervene in the above-captioned docket pursuant to RSA 541-A: 32 and Puc §§ 203.02 and 203.17. In support of its Petition, PSNH says the following:

1. PSNH is a New Hampshire public utility engaged in the business of the distribution and sale of electricity in New Hampshire. PSNH is also the largest “provider of electricity” in New Hampshire as that term is defined in RSA 362-F:2, XIV. As part of its obligations as a provider of electricity, PSNH is required to obtain and retire a certain amount of renewable energy certificates (“RECs”), including those denoted as Class III RECs, which encompass certain existing biomass and methane gas facilities. *See* RSA 362-F:3 and 362-F:4, III.

2. By its order of notice dated January 18, 2013 in this docket, the New Hampshire Public Utilities Commission (“Commission”) stated that it sought to investigate “whether it is appropriate for the Commission to adjust Class III renewable portfolio requirements, and if so, what calendar years should be adjusted, and how should the adjustments be calculated, including issues of implementation of RSA 362-F:4, VI.” January 18, 2013 Order of Notice in Docket No. DE 13-021 at 2. Any adjustments to the Class III REC requirements will have an impact on

how PSNH obtains and retires RECs in accordance with RSA chapter 362-F as well as on the amount of money PSNH spends to fulfill its Class III REC obligations.

3. Accordingly, because any changes to the market for Class III RECs will have a pronounced impact on PSNH and its customers, it is clear that PSNH has rights, duties, privileges, immunities or other substantial interests that may be affected by the proceeding. Therefore, PSNH requests to be a full intervenor in this proceeding pursuant to RSA 541-A:32 and the Commission's rules.

WHEREFORE, PSNH respectfully requests that the Commission issue an order granting PSNH's petition to intervene, and to order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

1/28/13

Date

By 

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