THE STATE OF NEW HAMPSHIRE Before the PUBLIC UTILITIES COMMISSION

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Determination Regarding PSNH's Generating Assets
Docket No. DE 14-238

CITY OF CONCORD'S PETITION TO INTERVENE

The City of Concord ("Concord"), by and through its attorneys, the Office of the City Solicitor, hereby requests to intervene in this matter pursuant to RSA 541-A:32 and Puc §§203.02 and 203.17. In support of its Petition, Concord states as follows:

- 1. On September 16, 2014, the Public Utilities Commission ("PUC") issued an order of notice opening a docket relative to the divestiture of PSNH assets. The PUC identified one of the issues as "the status of the 1999 restructuring settlement agreement with PSNH in Docket No. DE 99-099, and its application to issues in this docket." That 1999 Settlement Agreement contains, among other things, the statement that the "City of Concord shall be able to provide input in the development of the auction criteria for the Garvins Falls Road." The Garvins Falls Road encompasses more than 600 acres of land that is of vital importance to Concord. Concord meets the statutory requirements for intervention and should be an intervener in this proceeding in the interests of justice. Further, the orderly and prompt conduct of the proceedings will not be impaired by allowing Concord as an intervener.
- 2. Concord has a direct interest in the 1999 Settlement Agreement, the development of Garvin's Falls and in its tax base. Concord's interests will be affected by the PUC's decisions and its intervention in this matter is necessary.

WHEREFORE, the City of Concord requests its petition to intervene be granted.

Respectfully submitted,

CITY OF CONCORD

October 29, 2015

By: ____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first class U.S. mail, pursuant to N.H. Code Admin Rule Puc 203.11.

October 29, 2015

By: