

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

DE 16-693

Public Service Company of New Hampshire d/b/a Eversource Energy

Petition for Approval of a Power Purchase Agreement with Hydro Renewable Energy Inc.

**PETITION TO INTERVENE OF THE  
SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully petitions the New Hampshire Public Utilities Commission (“PUC”) for late intervention in the above-captioned proceedings pursuant to RSA 541-A:32 and PUC Rule 203.17 because the proposed Power Purchase Agreement (PPA) will impact the rights, duties, privileges, immunities, and other substantial interests of the Forest Society. In support of its request, the Forest Society states as follows:

1. On or about June 28, 2016, Public Service Company of New Hampshire (“PSNH”) d/b/a Eversource Energy (Eversource) filed a petition for approval of a PPA (PPA Petition) between Eversource and Hydro Renewable Energy, Inc., a wholly-owned subsidiary of Hydro Quebec (“Hydro Quebec”). The PPA is a 20 year term agreement under which power, to be transported along the proposed Northern Pass Transmission<sup>1</sup> line (“Northern Pass”), would be delivered from Hydro Quebec to Eversource.

2. The Forest Society is a non-profit membership organization dedicated to a few core missions including land conservation and advocacy on energy and the climate. The Forest Society was one of 27 participants in former Governor John Lynch’s Climate Change Task

---

<sup>1</sup> The Northern Pass Transmission line is the subject of a petition for certification before the Site Evaluation Committee, SEC Docket No. 2015-06 and multiple related dockets before the PUC.

Force. The 2009 report of the Task Force, called the NH Climate Action Plan, includes 67 specific recommendations for how the State and its citizens can reduce consumption of greenhouse gas fuels and adopt changes in land use that serve the larger goals of wise and lower energy consumption without compromising our high quality of life.

3. The Forest Society's advocacy supports regional energy and climate policies like the Regional Greenhouse Gas Initiative and statewide policies such as the NH Renewable Energy Act to advance a cleaner energy future. The Forest Society also supports appropriately sited commercial wind energy facilities in the state, and does not oppose the importing of Canadian hydro power as long as transmission lines are buried in previously disturbed corridors (such as transportation rights of way that can appropriately host such infrastructure).

4. The Forest Society also holds land in fee or easements over land affected by the Northern Pass project<sup>2</sup> which is the subject of the petition before the SEC in Docket No. 2015-06 and implicated in several dockets before the PUC including PUC DE 15-460 (Northern Pass Transmission Petition to Cross Public Waters) and PUC DE 15-464 (PSNH Petition to Lease Right of Way to Northern Pass Transmission), in all of which the Forest Society sought and was granted intervenor status.

6. The Forest Society petitions to intervene in this matter because PSNH has coupled the PPA to, and integrated it with, the underlying Northern Pass project in which the Forest Society has exhibited sufficient rights, duties, privileges, immunities and other substantial interests. Moreover, the Forest Society's advocacy role in energy and climate issues over many years uniquely qualifies it to provide a voice in whether the PPA is appropriate to meet the goals and interests of the public and energy consumers in New Hampshire. Granting of the Forest

---

<sup>2</sup> The list of Forest Society properties is listed in PUC DE 15-460 and PUC DE 15-464.

Society's petition will not undermine the orderly conduct of the proceedings but rather will ensure the ongoing protection of the public good and participation of the Forest Society's rights.

7. RSA 541-A:32 provides that "[p]ersons seeking to intervene in a proceeding shall file petitions with the committee ...." and further provides as follows:

The presiding officer shall grant a petition to intervene if:

(1) The petition is submitted in writing to the presiding officer ...;

(2) The petition states facts demonstrating that the petitioner's rights, duties, privileges, immunities or other substantial interests might be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and

(3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

8. In short, the proposed Petition will impact the rights, duties, privileges, immunities and other substantial interests of the Forest Society. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

**WHEREFORE**, the Forest Society respectfully requests that the Public Utilities Commission:

- A. Grant the Forest Society's Petition to Intervene; and
- B. Grant such other and further relief as may be just.

Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS**

By its Attorneys,

November 10, 2016

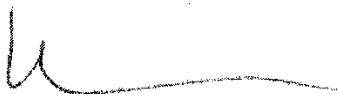
BCM Environmental & Land Law, PLLC  
3 Maple Street  
Concord, NH 03301  
(603) 225-2585



By: \_\_\_\_\_

Amy Manzelli, Esq. (17128)

[manzelli@nhlandlaw.com](mailto:manzelli@nhlandlaw.com)



By: \_\_\_\_\_

Elizabeth A. Boepple, Esq. (20218)

[boepple@nhlandlaw.com](mailto:boepple@nhlandlaw.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on this day, November 10, 2016, a copy of the foregoing petition was sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket.



By: \_\_\_\_\_

Amy Manzelli, Esq.